

SAFEGUARDING POLICY (Including the Child Protection Policy)

AIMS OF THE POLICY

Promoting and safeguarding the welfare of all boys at Tonbridge is one of our core duties. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Safeguarding requires a whole School approach and it is the responsibility of all School staff to safeguard and promote the welfare of our boys; specifically, it is to identify boys who may be in need of extra help or who are suffering, or are likely to suffer, significant harm, and to play their part in creating an environment where boys feel safe and can thrive and flourish thus building resilience and lowering the likelihood of harm. The School always considers the best interests of the boys, ensures the boy's wishes and feelings are taken into account when determining what action to take and what services to provide, and all staff have a responsibility to take appropriate action, working with other services as appropriate. Tonbridge School fully recognises its safeguarding responsibilities and has in place a range of policies and procedures that collectively form a safeguarding framework. The aim of this policy is to provide specific guidance on the safeguarding provisions outlined in Keeping Children Safe in Education ([KCSIE](#)) and to outline the overall School framework within which these policies operate.

The aim of the School's Safeguarding Policy is to:

- Establish and maintain an environment where boys feel secure, are encouraged to talk, and are listened to.
- Ensure that boys know that there are adults in the School whom they can approach if they are worried.
- Ensure that the robust policies and procedures in place to protect boys from significant harm are understood by all, and that these are reviewed and scrutinised on an annual basis. Any deficiency or weakness in the safeguarding policies which emerge will be remedied without delay.
- Ensure that all unnecessary risks are managed, whilst acknowledging that risk cannot be eliminated from any environment.
- Include opportunities in the Pastoral Education (PSHEE) curriculum for boys to develop the skills they need to recognise and stay safe from abuse, and to help them learn how to manage risks, including those they may encounter online.

In addition, this policy, alongside regular training, will provide all staff with the necessary framework and information to enable them to meet their child protection responsibilities, and will contribute to a consistent application of safeguarding practice throughout the School. The policy follows guidance and procedures outlined by the multi-agency partnership, Kent Safeguarding Children. Further details of these local procedures can be found at: <http://www.kscmp.org.uk/>.

The School's Safeguarding Policy takes into account the following legislation and guidance:

- Section 175 of the Education Act 2002
- Education (Independent Schools Standards) (England) Regulations 2014
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Equality Act 2010
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2025)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)
- What to do if you're worried a child is being abused: advice for practitioners (2015)
- Guidance for safer working practice for those working with children and young people in

education settings (2019)

- Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies (2017)
- Use of reasonable force: Advice for headteachers, staff and governing bodies (2013)
- Preventing youth violence and gang involvement; Practical advice for schools and colleges (2013)
- Teacher Misconduct: the prohibition of teachers (2022)
- Boarding Schools: National Minimum Standards (2022)
- KSC Kent Support Levels Guidance Sheet
- The Prevent duty: an introduction for those with safeguarding responsibilities (2023)
- Understanding and identifying radicalisation risk in your education setting (2023)
- Managing risk of radicalisation in your education setting (2023)
- How social media is used to encourage travel to Syria and Iraq: briefing note for schools (2015)
- Children Missing Education (2024)
- Tackling Child Sexual Exploitation (2015)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)
- County Lines Violence, Exploitation & Drug Supply, National Crime Agency (2017)
- Criminal exploitation of children and vulnerable adults: county lines (2023)
- Child sexual exploitation: definition and guide for practitioners (2017)
- Behaviour in schools: advice for headteachers and school staff (2022)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025)
- Teaching Online Safety in School (2023)
- Mental health and behaviour in schools (2018)
- Working together to improve school attendance (2024)
- Promoting and supporting mental health and wellbeing in schools and colleges (2024)
- When to call the police: Guidance for schools and colleges (2020)
- Data protection in schools (2024)
- Going to Court and being a witness (2017)
- Guidance for Schools and Colleges: Gender Questioning Children (2023)

REFERENCE TO OTHER SCHOOL POLICIES

This Safeguarding Policy should be read in conjunction with the School policies listed below:

- Child Protection (within this document)
- Tonbridge School Ethos and Aims
- Pastoral Care
- Philosophy of Care
- Statement of Boarding Principles
- Anti-Bullying
- Cyberbullying
- Whistleblowing
- General Health and Safety
- Medical
- Staff Handbooks and Code of Conduct
- Online Safety
- IT Acceptable Use (Staff) Policy (including email)
- Trips and Educational Visits
- Staff Recruitment
- Emerging Technologies and Use of New Media
- Taking, Storing and Using Images of Pupils

- Record Keeping
- Self-Harm
- Behaviour, Rewards and Sanctions
- Pastoral Education (PSHEE)
- Relationship and Sex Education
- Attendance
- Alcohol and Smoking
- Spiritual, Moral, Social and Cultural Development of Pupils
- Disabled Persons (The Treatment of)
- Discrimination and Equal Opportunities (For Boys)
- Special Educational Needs and Disabilities
- EAL
- Provision of Food for Boys with Particular Religious, Cultural or Medical Dietary Requirements
- Physical Restraint
- Privacy Notice for Boys
- Searching and Confiscations
- Independent Person
- Complaints Procedure for Parents
- Boy Who Has (or Seems to Have) Gone Missing
- Pupil Supervision
- Drugs
- The Prevent Duty at Tonbridge School
- Mobile Phone Use
- Visitors
- Admissions
- Bounds, Safety Hazards and Risk Assessments for Pupils
- CCTV
- Occasional Business Use

This policy will be freely available to parents on our website and a hard copy provided on request.

MANAGEMENT OF THE POLICY

The Deputy Head Pastoral is the Designated Safeguarding Lead (DSL) and will provide oversight of the Safeguarding Policy. He is supported in this role by the Second and Lower Masters, the Chaplain and Sports Centre Manager (who are Deputy DSLs) and Chief Operating Officer (COO) who shares the Health and Safety responsibility). Other staff with safeguarding experience may contribute to the contents of the policy.

More fundamentally, all staff in all contexts are responsible for ensuring that safeguarding is given the highest possible priority. Any concerns with regards to safeguarding should be reported in the first instance to the DSL, although it should be noted that **anybody can make a referral in exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken. Staff can contact KELSI for advice or contact the Front Door Service directly.** Contact details of relevant agencies are in Section 3. of this policy.

It is the role of the Governing Body to provide scrutiny of Safeguarding policy and practice. The Chairman of Governors formally approves this policy after discussion at the full Governing Body in the Michaelmas Term. Any subsequent amendments are jointly approved by the Chair of Governors and the Safeguarding Governor. The Pastoral Committee provides regular oversight of safeguarding policy and practice in the School and is chaired by Mrs Kate Wheadon. The Safeguarding Governor with specific responsibility for Child Protection is Dr Nicki Perry. Dr Perry is nominated by the Governing

Body to liaise with the Integrated Children's Services on issues of child protection as required.

Any child protection or safeguarding issue which is deemed to have posed significant harm to a young person, any suspicions of abuse or information relating to allegations outside of School will be referred by the DSL (in consultation with the Headmaster) to the local LADO Education Safeguarding Advisory Service (LESAS). Allegations against members of staff or adults working at the School should be referred by the Headmaster to the LADO team (see section 2. for detailed guidance). If a suspected criminal act has been committed, the School will consult safeguarding partners and the police will also be informed if appropriate.

TRAINING AND INDUCTION

Tonbridge School recognises the importance of training to enable members of staff to identify the possible signs of abuse and/or neglect, and to know what to do if they have a concern. All new staff, Governors, part-time staff, volunteers and Praepostors will receive appropriate Safeguarding and Child Protection training as part of their induction process, including the contents of this policy; and this training will be regularly updated. We will ensure that all staff working directly with children read and understand at least Part one of 'Keeping Children Safe in Education' (2025), or Annex A of that document for certain staff not working directly with children. CPD is essential to any effective Safeguarding Policy; consequently, and in addition to the training provided by the local Education Safeguarding Service, all staff receive update Safeguarding training on a regular basis. This training will include Online Safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The DSL and the deputy DSLs update their training at least every two years with the LESAS and at other times as necessary.

I. CHILD PROTECTION POLICY

Aims

Tonbridge School aims to provide an environment in which there are effective procedures for safeguarding and promoting the welfare of all boys in our care. The School starts from the premise that the welfare of the child is paramount. We aim to establish an ethos where boys feel secure, know that there are adults to whom they can talk in times of difficulty and where positive steps are taken to build self-esteem and confidence. We also recognise the importance of working with other agencies such as social care, the police, health services, other agencies and Safeguarding Partners to ensure the welfare of children under our protection. This includes providing a coordinated offer of Early Help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child in need or Child Protection plans. Tonbridge School adheres to Child Protection procedures that have been agreed locally with the LESAS and is subject to regular scrutiny and review by the Governing Body. The Safeguarding Governor conducts an annual Safeguarding Audit, submitted to the Governing Body, in which she reviews the School's Safeguarding and Child Protection Policy and practice. The Deputy Head Pastoral discusses Safeguarding issues on a termly basis in the Governors' Pastoral Committee meetings.

There are two main elements to our policy:

a. Safeguarding and promoting the welfare of children

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

b. Recruitment and Training

Protecting those in our care by following agreed procedures and ensuring the School follows robust safe recruitment procedures. Once appointed, staff are appropriately trained, appraised and supported to respond appropriately to Child Protection concerns. The School also has robust procedures in place for external contractors and agencies.

This policy applies to all teaching, non-teaching and volunteer staff, contractors and to School Governors. Tonbridge School also recognises that occasionally young people may be harmed by other young people, and that there may be occasions when a boy's behaviour warrants a response under child protection rather than anti-bullying procedures. See the section on Child-on-child abuse for more details.

Roles, Responsibilities and Training

All adults working with children have a responsibility to safeguard and promote their welfare and staff should be aware of their roles in safeguarding children, identifying those in need of early intervention and supporting a pupil in receipt of Early Help. There are however, key people within Tonbridge School who have specific responsibilities:

The Deputy Head Pastoral, Mr C.J.C Swainson, is the Designated Safeguarding Lead (DSL) to whom all Safeguarding and Child Protection issues should be notified (apart from an allegation of abuse against a member of staff, which must be reported directly to the Headmaster). The Deputy Head Pastoral will report on such issues to the Headmaster. The DSL (or in his absence his deputies) is responsible for the management of referrals, training of all staff and ensuring that all staff and Governors know School Policy and implement it appropriately. See Annex I of this policy for the Job Description of the Designated Safeguarding Lead(s).

The Second Master, Mr. J.R. Bleakley, the Lower Master, Mrs J.H. McNeil, the School Chaplain, Rev. D.A Peters and the TSC Manager, Mr A. Lloyd have all received training for DSLs and can deputise for the DSL. In the absence of the Deputy Head Pastoral, the Second Master will take the lead.

Mrs Kate Wheadon chairs the Governors' Pastoral Committee which has responsibility for Safeguarding and child protection issues and Dr Nicki Perry is the Safeguarding Governor.

The DSL and his deputies will update their training in child protection and inter-agency working at least every two years, but usually annually, by a recognised external provider (approved by KCC). The Headmaster and all teaching and support staff, along with the Governors will receive training at least annually from the DSL, his deputies or an external provider. This may be in the form of email updates, in staff meetings, or via seminars or talks during INSET at the beginning of terms, or at other times. In addition, all staff (including temporary staff and volunteers) will be provided with an induction that includes:

- The School's Safeguarding (including the Child Protection) Policy
- Behaviour Rewards and Sanctions Policy
- Attendance Policy
- The Staff Code of Conduct
- The Whistleblowing Policy
- The Acceptable Use of Computers (Staff) Policy
- The identity of the Designated Safeguarding Leads
- A copy of the appropriate sections of KCSIE depending on their role

Additional policies will be included for new members of staff whose role involves working directly with boys.

Those members of management involved in recruiting staff are required to operate safe recruitment procedures in line with the statutory guidance set out in KCSIE. There will always be at least one member on any recruitment panel who has completed appropriate safer recruitment training.

All members of staff, both teaching and non-teaching, should be able to recognise signs of child abuse and be familiar with the correct procedures for communicating their concerns, including procedures for dealing with Child-on-child abuse. They must also ensure that their behaviour and actions do not place boys or themselves at risk of harm or of allegations of harm to a boy. There is guidance relating to staff conduct in the Tonbridge School Handbook and the Staff Code of Conduct. All staff should be aware of the School's Whistleblowing Policy and the way that this impacts on issues of child protection, the notes on confidentiality set out in the Pastoral Handbook; know what their responsibilities are in relation to boys' behaviour as set out in the Behaviour, Rewards and Sanctions Policy, know the safeguarding response to boys who are absent from education, particularly on repeat occasions and/or prolonged periods. All staff are issued with Child Protection cards by the Deputy Head Pastoral or Director of HR and should be aware of the role of the DSL (including the identity of the DSL and deputies). All staff should be aware of their local Early Help process, understand their role in it and should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Additionally, all staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality and for record keeping. Staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse. Staff should also be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Early Help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any child may benefit from Early Help, but all staff should be particularly alert to the potential need for Early Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from education, care or from home;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools;
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a parent or carer in custody, or is affected by parental offending;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- Is misusing drugs or alcohol themselves;
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation, or Forced Marriage;
- Is a privately fostered child.

Abuse, Neglect and exploitation

All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL (or deputy). Abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another and can be associated with factors outside school and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalization.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Indicators of abuse, neglect and exploitation

Abuse. This is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse. A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when an adult or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse. The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect. The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual abuse (see also sections on Youth Produced Sexual Imagery (Sexting) and Child-on-child abuse). Sexual abuse involves forcing or enticing a child to take part in or watch sexual activities, not

necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet), or upskirting. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-child abuse) in education and all staff should be aware of it and the procedures for dealing with it. It is important to recognise that some young people who are being sexually abused do not exhibit any external signs of this abuse.

Some indications of possible abuse

- Unusual, even bizarre behaviour
- Unexplained injuries
- Emotional withdrawal – showing lack of trust in adults
- Eating problems
- Not growing or putting on weight
- Timid and withdrawn
- Over-demanding, mood swings, aggressiveness
- Poor academic work, under-achievement
- Tiredness
- Persistent absence from school or lessons
- Inadequate standards of dress or personal hygiene

For more information visit: <http://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>
Behaviour that is out of character for a given boy is not in itself an indication of abuse. Any staff concerned about a boy's behaviour or demeanour should, however, report it to the boy's Housemaster, who is in the best position to see the fuller picture and may already have other evidence leading to concern. It is also important to be aware of the possibility that abuse can also be perpetrated by one boy against another (see guidance below).

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of child abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take

place online. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well

placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. There is a range of advice to help identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the 'Mental health and behaviour in schools' guidance. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

Child-on-child Abuse

Tonbridge School also recognises that children can abuse other children (often referred to as Child-on-child abuse), and that there may be occasions when a boy's behaviour warrants a response under child protection rather than anti-bullying procedures. The School will always act in the interests of any child at risk of or actually suffering from harm.

It is more likely that girls will be victims and boys' perpetrators, but all Child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Tonbridge School has a zero-tolerance approach to abuse and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Staff should always challenge such behaviours. Staff should understand that even if there are no reports in School it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding Child-on-child abuse they should speak to the DSL (or deputy) including reporting those concerns related to behaviour or activity outside of the School premises, and or online.

Intimate physical relationships are not permitted between boys whilst at School including in their Houses, and the School recognises that this is one area where Child-on-child abuse may be more likely. Staff are aware of the risks, and routines and expectations of boys' behaviour minimise the likelihood. The School recognises that children can be responsible for sexual violence and sexual harassment against other children and that such behaviours can occur between two children of any age and sex. Such behaviours can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may

overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. **The School's responses are underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.** All staff are advised to maintain an attitude of **'it could happen here'**. Some situations are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law;
- creating and sharing sexual photos and videos of under-18s is illegal. This includes children making and sharing sexual images and videos of themselves;
- Upskirting, which is a criminal offence.

However, reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with their child protection policy. All the normal avenues for staff or boys reporting concerns therefore apply. However, **any member of staff or boy who has a concern about sexual violence or sexual harassment should immediately report this to the DSL.** The DSL will consider the response on a case by case basis, but will follow the local referral procedures and will seek advice from the LESAS and other safeguarding partners. Staff should be aware that Children with SEND are more likely to be victims of sexual violence.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. The initial response to a report from a child is incredibly important. The School's response to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

Any serious or criminal allegation should be referred to local safeguarding partners. It is also the case that a bullying incident may be treated as a child protection incident where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In these situations, the DSL should be informed at the earliest possible opportunity. It would be an expectation that, in the event of disclosures about boy-on-boy abuse, all those involved, whether perpetrators or victims, are treated as being "at risk" and would be offered support through the School pastoral systems, including the School Counsellor or, if necessary, via independent counsellors.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the boy and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

Youth Produced Sexual Imagery (Sexting)

While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible effects on a child's wellbeing if imagery of this nature is shared beyond their control. In certain circumstances the DSL may have to refer an incident of this nature to the police, but Schools are not obliged to do this in all cases, as detailed in 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (2020). Staff should refer to the DSL any incidents where it is thought that explicit or sexual images of young people may have been made (including by generative AI), distributed by or be in the possession of, a boy. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences and staff should take any direct disclosure very seriously. Staff **must not** request to view the imagery but should confiscate a device which contains suspected imagery and pass this on to the DSL. The DSL, with input from the Headmaster, will follow the guidance set out in 'Sexting in schools and colleges: responding to incidents and safeguarding young people', including conducting an initial review meeting and considering, in certain circumstances, immediate referral to safeguarding partners.

If, following consultations with outside agencies, further external engagement is not considered necessary, the DSL will work with appropriate pastoral staff such as the Housemaster and School Counsellor and, in most cases the boy's parents, acting in the best interests of the boy to ensure that he is safeguarded, supported and educated.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and such cases would always be referred to the police.

Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim. It can also involve someone taking pictures for a similar purpose in other scenarios like dorms, bedrooms, changing rooms and toilet cubicles.

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism.. Similar to protecting children from other forms of harm and abuse, protecting children from this risk is part of the School's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being

drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or deputy) making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from becoming terrorists or being drawn into terrorism”. This duty is known as the Prevent duty and is part wider safeguarding obligations.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from School may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages. The DSL should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

So called ‘honour-based’ abuse (HBA), including Female Genital Mutilation (FGM) and Forced Marriage:

Despite this being a School for boys, staff need to be alert to the possibility of a girl (e.g., the sibling of a boy at Tonbridge) being at risk of HBA, or already having suffered HBA, or being at risk of involvement in HBA.

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Victims of FGM are likely to come from a community that is known to practice FGM. HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. If you think that a child may be at risk of female genital mutilation or if you suspect that FGM has already happened, even if it is not recent, you must seek help and advice. Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. Staff with any concern must contact the DSL who will activate appropriate safeguarding and referral procedures. Relevant contact details are available in Section 3.

It has also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages. Staff should speak to the DSL (or deputy) with regard to any concerns about Forced Marriage.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Use of School Premises by Other Organisations

Where services or activities are provided separately by another body using the School premises, the School will seek assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises may be refused.

If an allegation is made relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children, as with any safeguarding allegation, the School will follow safeguarding policies and procedures, including informing the LADO.

Children who are absent from Education

The School understands its duty in relation to the risks posed by boys missing from education. All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any special educational needs they may have. A boy being absent from education for a prolonged period and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that the School's responses to persistently absent boys missing education support identifying such abuse, and in the case of absent boys, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where boys are already known to local authority children's social care and need a social worker, where being absent from education may increase known safeguarding risks within the family or in the community. The School will be proactive in supporting parents and boys who are missing School for any reason. The School will report to, and work with, the Local Authority instances of prolonged unauthorised absence or of a boy being removed from the School's list under the circumstances outlined in KCSIE, 'Children Missing Education' and 'Working together to improve school attendance'.
<https://www.kent.gov.uk/education-and-children/schools/school-attendance/children-missing-education>

Private Fostering

A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. The School will report to the Local Authority any instances of Private Fostering of boys.

Serious violence, County Lines and Gangs

Staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts

which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing. Where there are concerns that a young person may be drawn into gang activity, staff should report this to the DSL in the first instance who will refer using the Local Safeguarding process.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme.

Children with Special Educational Needs and Disabilities (SEND)

Children with SEND can provide additional safeguarding challenges. Staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include: Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers. The School has a duty to make reasonable adjustments for disabled boys.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged. Local authorities should share the fact that a boy has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the boy's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and the School. Where a boy needs a social worker, this will inform decisions about safeguarding and about promoting welfare.

Looked after children and previously looked after children

Appropriate staff have access to the information they need in relation to a boy's looked after legal

status and the boy's contact arrangements with birth parents or those with parental responsibility. They should also have information about the boy's care arrangements and the levels of authority delegated to the carer by the authority looking after him. A previously looked after boy potentially remains vulnerable. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Children who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, the School should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack a trusted adult with whom they can be open. It is, therefore, vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

One-to-One Situations

Staff working in one-to-one situations with boys are potentially more vulnerable to allegations. It therefore makes sense to plan and conduct such meetings to ensure that the security of both boy and staff are met. It is recommended that such meetings should take place where there is visual access and/or an open door. It is also strongly recommended that notes are kept of any meeting likely to be difficult, and consideration given to having another member of staff in the room or close by. If any boy becomes distressed or angry in any such meeting, always report this to a senior colleague. If anyone employed by the School is regularly in a one-to-one situation with boys, a risk assessment can be undertaken. Staff whose roles specifically require one-to-one teaching, such as visiting instrumental music teachers, work in rooms with visual access.

Boarding

Boarding schools have additional risk factors to consider when safeguarding boarders due to the unique nature of boarding accommodation, the risk from boys sharing overnight accommodation and the reduced ability for a boy to remove themselves from another boy, or boys, in child-on-child abuse, including bullying.

The School Memoranda addresses the importance of healthy relationships. Boys should behave in a kind and considerate way towards all other boys in the school, respecting those who have different values and opinions. Sexual relationships are not permitted in any circumstances. Boys found to be in breach of this rule should expect to be required to leave the School.

Staff need to be aware that boarding accommodation, and dormitories in particular, where boys are sleeping overnight can lead to an environment where child-on-child abuse, and in particular bullying, is hard to detect. Staff should therefore be particularly vigilant, looking for changes in boys' appearance and behaviour; knowing and talking to the boys is particularly important. Staff should not hesitate to move boys between rooms if there is either suspicion, or evidence, that bullying is taking place. In serious cases boys can also spend time in the Medical Centre whilst an investigation takes place. The School reserves the right to move a boy or boys to a different house at the conclusion of an investigation, to prevent further bullying.

In trying to manage harmful online content that boys may have brought into school on a device or used 3, 4 or 5G to download thereby bypassing the School's filtering and monitoring systems, the School will search a boy's device, or devices, wherever suspicion arises.

Contextual Safeguarding

Professionals should consider the context within which incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Procedure to follow by a member of staff if abuse is suspected or reported

All staff should maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If any member of staff:

- Suspects that child abuse is occurring;
- Identifies child abuse;
- Is concerned that School practices or the behaviour of others may be putting a child at risk of abuse;
- Suspects that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Has an incident, complaint or suspicion reported to him/her.

or have any concerns about a child's welfare, they should act on them immediately.

They must:

- Make brief notes at the time or as soon as possible afterwards and ensure that these original notes are kept;
- If required, complete a body map recording sheet to record any injuries observed;
- Record these notes, any body map and other relevant information on CPOMS if they have access. This, however, is not the same as alerting a DSL in an urgent and/or serious case.
- Immediately stop any other activity to listen;
- Not ask leading questions (it may prejudice the investigation);
- Not give guarantees of confidentiality but provide assurance that only those who need to know will be informed;
- Not make any attempt to investigate the incident themselves;
- Preferably immediately, but in any case, within twenty-four hours, inform the DSL (the Deputy Head Pastoral);
- If the concern/complaint is likely to involve a member of staff, the informant must report it to the Headmaster;
- If the concern/complaint is likely to involve the Headmaster, the informant must report it to the Chairman of Governors.

Subsequent action taken by the DSL and/or the Headmaster

The DSL, in conjunction with professional safeguarding advice from the West Kent Education Safeguarding Team and with reference to the Kent Support Levels Guidance Sheet, will decide upon any action needed to ensure the immediate protection of the boy concerned and any further

investigation. Depending on the nature of the information received the DSL, taking into account the context of the situation within and outside School as much as possible, will decide whether a boy requires additional support from one or more agencies (with a likely referral to the School Welfare Group) or whether a boy (who has been or is at risk of serious harm) should be reported to children's social care immediately. The 'Request for Support' form is accessed via the Kent Integrated Children's Services Portal

(<https://webapps.kent.gov.uk/KCC.ChildrensPortal.Web.Sites.Public/Default.aspx>). Guidance on completing the form is available from (<https://www.kelsi.org.uk/child-protection-and-safeguarding/LADO-Education-Safeguarding-Advisory-Service>).

If a boy is or may be at risk of harm, the School does not require the consent of parents to make a referral.

Records and Monitoring

Well-kept records are essential to good child protection practice. All incidents relating to child protection must be recorded, together with any accompanying notes. These must be given to the DSL, who will ensure that these are stored securely. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Tonbridge School uses safeguarding software in the form of CPOMS and this is the preferred method of recording all safeguarding records and the ongoing monitoring of boys. All staff will have appropriate training in the use of CPOMS.

If in doubt about recording requirements, staff should discuss with the DSL (or deputy). The DSL will also ensure that details are given to any other person who needs to know about the particular child under threat, and who might be involved in the monitoring of that child. The DSL will also be responsible for liaising with any other agencies to whom a referral might be warranted, taking account of the GDPR and the Data Protection Act 2018, noting the condition that 'safeguarding of children and individuals at risk' is a processing condition that allows appropriate sharing of special category personal data. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children and information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. When a boy moves school, in addition to handing over any child protection file securely, the DSL will consider the appropriateness of sharing information proactively with the new school to enable the new school to have support in place when the boy arrives, and to ensure that key staff, such as the DSL and SENDCO, are aware of any needs.

2. ALLEGATION AGAINST A MEMBER OF STAFF

Introduction

Tonbridge School is committed to providing the highest level of care for both its boys and its staff. The Staff Code of Conduct outlines our expectations of colleagues working at Tonbridge School. It is extremely important that any allegations of abuse against a teacher, any other member of staff, or volunteer in the School is dealt with thoroughly and efficiently, maintaining the highest level of protection for the boy whilst also giving support to the person who is the subject of the allegation. Our policy is in line with statutory guidance from the Department for Education as detailed in Part Four of Keeping Children Safe in Education.

This policy is designed to ensure that all staff, boys and parents or carers are aware of the procedure for the investigation of allegations of abuse in order that all complaints are dealt with consistently, and as efficiently as possible.

We hope that having a clear policy outlined will help boys to feel comfortable that they can voice concerns about any member of staff. Allegations will be reported to the Headmaster immediately or to the Chair of Governors where the Headmaster is the subject of concern. All allegations will be taken seriously, and appropriate action will be taken immediately.

Purpose

The procedure for dealing with allegations against staff depends on the situation and circumstances surrounding the allegation. This policy must be followed when dealing with allegations but may be adapted to each case as advised by external agencies. This policy will be used alongside the School's Complaints Policy, Whistleblowing Policy and Disciplinary policies.

This policy will be used in any case where it is suspected or alleged that a member of staff, a teacher or a volunteer at the School has:

- Behaved in a way that has harmed a boy or may have harmed a boy;
- Possibly committed a criminal offence against or related to a boy; or
- Behaved towards a boy or boys in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Timescale

It is imperative that allegations against staff are dealt with as efficiently as possible to:

- Minimise the risk to the boy making the allegation and to other boys;
- Minimise the impact on the boy's academic progress;
- Ensure a fair and thorough investigation for all parties.

To enable this to happen, all staff, parents, and boys should be aware of the procedures set out in this policy.

Procedure

i. Reporting an allegation

All concerns of poor practice or possible child abuse by staff should be reported immediately to the Headmaster. Complaints about the Headmaster should be reported to the Chair of Governors who will then contact the Local Authority Designated Officer (LADO) Team.

Members of staff who are concerned about the conduct of a colleague towards a boy are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. **However, all staff must remember that the welfare of the boy is paramount and must report their concerns immediately.**

The Headmaster, who may also discuss the situation with the DSL (or deputy), will contact the LADO team as soon as possible and in any case within 24 hours and a discussion will take place to decide any next steps. All allegations should be referred to the LADO team for advice **before any investigation by the School takes place.** In borderline cases, these discussions can be held informally without naming the individual. Any formal referrals must be done via the completion of a Kent **Integrated Children's Services Portal** form, available at: <https://www.kscmp.org.uk/procedures/local-authority-designated-officer-lado> In the case of serious harm or criminal activity the police should be informed from the outset.

The School will share available information with the LADO about the allegation, the boy, and the person against whom the allegation has been made and consider whether a police investigation or a strategy discussion is needed or whether no further action is required. Representatives from other safeguarding

partners may be invited into the discussion.

ii. Investigation

An investigation into the allegations is normally carried out by children's social services or by the School. This will be agreed with the LADO team at the initial evaluation stage. Where the School is not conducting the investigation, it will cooperate with investigative agencies.

Internal investigations must be second to any safeguarding investigation and may need to be delayed until the external investigation is complete.

The following definitions will be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

iii. Supporting those involved

a. The boy(s) making/implicated by an allegation and his/their parents/carers:

Unless there is direction to the contrary from safeguarding partners, parents and carers will be notified if their son makes or is involved in an allegation against staff if they do not already know. Parents and carers will be made aware of any progress in the investigation, and where there is no criminal prosecution, the outcome will be explained to them. This may be a disciplinary outcome. During a disciplinary hearing the deliberations and information used for making a decision are usually confidential, but parents will usually be told the outcome.

Boys (and their parents or carers) will be offered support by the School Counsellor and the School will work with and support outside agencies who offer specialist services to the boy and his family. All reasonable precautions will be taken to limit the number of people made aware of the allegations.

Safeguarding partners may be involved, depending on the severity of the case, and will provide the School with advice on what type of additional support the boy and his family may need.

The boy and his parents and carers will be made aware of the law requiring confidentiality to be maintained while investigations are ongoing (see **Confidentiality** below).

b. A member of staff making an allegation:

The School's Whistleblowing Policy enables staff to raise concerns or allegations against their colleagues in confidence and for a sensitive enquiry to take place.

c. The employee against whom an allegation is made:

Tonbridge School has a duty of care to its employees and will do everything it can to minimise the stress of any allegations, investigations and the possible subsequent disciplinary process.

The person who is the subject of the investigation will be informed as soon as possible after the allegation has been made, but only after this has been agreed with the LADO team, social services or police, who will advise as to what information may be disclosed, and once the Headmaster has spoken to the Chair of Governors. The employee will then be advised on the next course of action. They will be advised to contact their Trade Union or other professional body representative, if they have one, and will be provided with a named representative whose role will be to keep the subject of the

investigation informed of the progress of the case and consider what other support is appropriate for the individual.

If the allegation is against a member of the residential boarding staff (such as a Housemaster or Assistant Housemaster) and that member of staff is suspended from duty as a result of the allegation, the School will provide alternative accommodation for that member of staff for the duration of the investigation.

The employee may need additional support and the School will consider what might be appropriate to best accommodate this. If there is a criminal investigation and the police are involved, they may provide this additional support.

Confidentiality

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence, as set out in section 141F of the Education Act 2002, to publish information (including 'any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public') that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence.

Suspensions

All options to avoid suspension will be considered prior to making the decision to suspend a member of staff. The School will not suspend a member of staff without serious consideration and will not do it automatically once an allegation has been made. Depending on the nature of the case, it may be possible that alternative arrangements are made so that the individual can continue working, but is removed from contact with the boy making the allegation.

A suspension may be decided upon if it is deemed that the boy or other boys may be at risk of harm, the case is so serious that it might be grounds for dismissal or if the nature of the case warrants a criminal investigation. The Headmaster holds the power to suspend an employee but will be advised by the police, LADO Team or Social Services whether or not a suspension is advisable. The decision to suspend, or not, will be kept under review. Similarly, if the member of staff is suspended, whether or not to continue to suspend will be kept under review by the Headmaster.

Where there is a chance of suspension, the employee will receive confirmation within one working day and will be informed of the reason for the suspension as well as a named contact within the School.

Resignations

If an employee hands in their resignation when the allegation is made or during an investigation, the investigation will continue until an outcome has been reached, with or without the person's cooperation. The employee will be given full opportunity to answer the allegation.

Settlement Agreements will not be used in situations which are relevant to these procedures. The School may refer the individual to external agencies as described below.

Record Keeping

Detailed records must be kept of allegations and all actions and decisions subsequently taken during the course of an investigation. Details of allegations, investigations and outcomes will be kept in the personal file of the person who has been under investigation. This will enable the School to:

- Provide all the necessary information for future schools if they require a reference. Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. Where DBS checks highlight incidents of allegations that did not result in any criminal charges, records will need to show exactly what happened, what points of action were taken during

and after the investigation, and how the conclusion of the investigation was reached.

- Prevent unnecessary re-investigation in the future if an allegation re-surfaces.

The record will be kept, including for people who leave the organisation, at least until the person reaches normal retirement age or for 10 years if that will be longer, from the date of the allegation.

Allegations that are proven to be malicious will not be kept on employment records or used in employee references. The records will be kept by the School.

Details of any allegation made by a boy will be kept in the confidential section of their record.

Action on the conclusion of the case

The Headmaster is required to refer any colleague who is deemed unsuitable to work with vulnerable and young people and who has been removed from regulated activity to the Disclosure and Barring Service (DBS). If the investigation results in the dismissal or resignation of a person, and that person has been charged with a criminal offence, a referral will be made immediately by the School to the Disclosure and Barring Service and the Teacher Regulation Authority (TRA). Where the threshold for referral to the DBS has not been met, separate consideration should be given to a referral to the Teacher Regulation Authority (TRA). Such a referral may be in relation to unacceptable professional conduct, conduct that might bring the profession into disrepute or a conviction at any time for a relevant offence. The School may be advised on this by the police and/or social services.

If it is decided that the employee may return to School (after a suspension) then provisions will be put in place by the School to ensure that the transition is as smooth as possible. This may involve a phased return for a trial period or the use of another member of staff as a support system in the short term. If the boy who made the allegation is still at the School, the School will consider what needs to be done to manage the contact between employee and boy and to best support each party.

Action in the case of false allegations

Where an allegation made by a boy is proven to be false or malicious, the Headmaster and Chair of Governors may refer to social services to determine whether the boy is in need of special care, or to help to understand if they are being abused elsewhere.

Additionally, if an allegation made by a boy is found to be intentionally false or malicious, the Headmaster will decide what the proper sanction will be for the boy who made the allegation.

A malicious accusation made by a member of staff is a disciplinary offence and may also be a criminal offence. If the police do not intend to pursue this, the School's possible actions are described in the Disciplinary Policy and Procedures.

If a false or malicious claim has been made by a person who is not a boy or member of staff, the School will hand the information over to the police who may take further action against that person.

After the case

No matter what the outcome is of an allegation of abuse against staff, the School will review the case to see if there are any improvements that can be made in its practice or policy that may help to prevent similar cases in the future.

Learning Lessons

Throughout the process in handling allegations and at the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the School's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case

manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Low level concerns

As part of a whole School approach to safeguarding, Tonbridge School tries to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enabling the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being overfriendly with children,
- having favourites,
- taking photographs of children on their mobile phone,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door or,
- using inappropriate sexualised, intimidating or offensive language.

Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records are kept confidentially, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor

performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Sharing low-level concerns

All staff, boys and parents or carers can share any low-level concerns about staff confidentially with either the DSL, the Second Master (and DDSL) or the Headmaster. The DSL or Second Master will inform the Headmaster of all the low-level concerns in a timely fashion according to the nature of each particular low-level concern. The Headmaster will be the ultimate decision maker in respect of all low-level concerns. In most cases the concern will be dealt with by the DSL and Second Master in consultation. If the School is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the LADO will be consulted. Low-level concerns which are shared about supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

3. RELEVANT CONTACT DETAILS

Governor Chair of the Pastoral Committee:

Mrs Kate Wheadon: 07941 243761 kate.wheadon@tonbridge-school.org

Safeguarding Governor:

Dr Nicki Perry: 07974 102478 nicki.perry@tonbridge-school.org

Designated Safeguarding Lead:

Mr Colin Swainson, Deputy Head Pastoral: 01732 304299 and 07502 457833.

colin.swainson@tonbridge-school.org

Deputy Designated Safeguarding Leads:

Mr John Bleakley, Second Master: 07919 917761 john.bleakley@tonbridge-school.org

Mrs Josie McNeil, Lower Master: 07955 438285 josie.mcneil@tonbridge-school.org

Rev David Peters, School Chaplain: 07749707119 david.peters@tonbridge-school.org

Mr Alex Lloyd, TSC Manager: 01732 304111 alex.lloyd@tonbridge-school.org

Headmaster:

Mr James Priory: 01732 304296 james.priory@tonbridge-school.org

Chairman of Governors:

Mr Gavin Rochussen: Gavin.Rochussen@tonbridge-school.org or Skinners' Hall,
Dowgate Hill, London, EC4R 2SP 020 7236 5629

Independent Schools' Inspectorate:

CAP House, 9-12 Long Lane, London, EC1A 9HA

Tel: 020 7600 0100 Email: concerns@isi.net

The Office of the Children's Commissioner:

Dame Rachel de Souza, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT

Tel: 020 7783 8330 Email: info.request@childrenscommissioner.gsi.gov.uk

Website: www.childrenscommissioner.gov.uk

Help at Hand (advice and assistance)

Tel: 0800 528 0731 Email: help.team@childrenscommissioner.gov.uk

Local Authority Designated Officer (LADO) Team:

Tel: 03000419191 or if urgent 03000 411111

LADO Education Safeguarding Advisory Service (LESAS) Enquiry Form: [here](#)

LADO Education Safeguarding Advisory Service (LESAS) via the LESAS Enquiry Form: [here](#) and the LESAS access to support flowchart:

https://www.kscmp.org.uk/_data/assets/pdf_file/0004/169699/LESAS-Mission-Statement.pdf

or on 03000 411111 or if urgent and out of house 03000 419191

Kent and Medway Safeguarding Children Procedures can be found at:

<http://www.kelsi.org.uk/>

Kent Safeguarding Children multi-agency partnership:

Room 2.71, Sessions House, Maidstone, ME14 1XQ <https://www.kscmp.org.uk/> or kscmp@kent.gov.uk

The Education Safeguarding Service (for West Kent):

Worrall House, 30 Kings Hill Avenue, West Malling, Kent, ME19 4AE Tel: 03000 42 31 58

Childline:

Tel: 0800 1111

Website: www.ChildLine.org.uk

NSPCC Whistleblowing Advice Line:

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

FGM Helpline: You can call 101 to report suspected or known cases of FGM. The Childline helpline is 0800 028 3550, email fgmhelp@nspcc.org.uk. **If you think a child is at immediate risk, call 999.**

The contact details for DBS referrals are:

PO Box 181, Darlington, DL1 9FA

Tel: 01325 953 795

TRA Teacher Misconduct:

<https://www.gov.uk/government/publications/teacher-misconduct-referral-form>

Department for Education: dedicated telephone helpline and email address for non-emergency advice for staff and governors relating to radicalisation and the Prevent Duty:

020 7340 7264 and counter.extremism@education.gov.uk

Non-emergency police number (for advice regarding Prevent Duty):

Telephone: 101

Reporting Radicalisation or Extremism (Prevent). <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/community-safety-and-crime-policies/counter-terrorism-strategy-contest/report-radicalisation-or-extremism-prevent>

Early Help and Preventative Services (EHPS) for West Kent:

<https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts> or EarlyHelpNotificationT&M@kent.gov.uk or 03000 421576

4. SAFER RECRUITMENT

Tonbridge School does all it can to ensure that we employ 'safe' staff by following the guidance in KCSIE and operating safe recruitment procedures in the appointment of all staff.

Tonbridge School recognises its duty to refer to the DBS any colleague who is deemed unsuitable to work with vulnerable and young people and who has been removed from regulated activity. All employees of the School, including unsupervised volunteers and adults (including spouses and adult children living in boarding accommodation), undergo an enhanced DBS check. There may be occasions when DBS clearance has failed to arrive before an employee of the School begins work. In these situations, an employee may commence employment without an enhanced DBS disclosure if:

- he/she arrives directly from employment in another school setting (alongside the checks outlined below) and

in exceptional circumstances, with approval from the DSL or the COO alongside all required checks on identity, right to work in the UK, a check of the Children's Barred List, and a risk assessment in place focusing on adequate supervision.

If the DBS certificate is delayed a short period of work is allowed under controlled conditions, at the discretion of the Second Master, Chief Operating Officer (COO) or DSL. This must be supported by:

- a satisfactory check of the children's barred list with all other relevant checks having been satisfactorily completed;
- the DBS application having been submitted for processing;
- appropriate safeguards taken including a written Risk Assessment with supervision in operation which is reviewed at regular intervals, or at least every week. The risk assessment must be read, agreed and signed by all relevant parties; and
- a note recorded on the SCR and evidence on file of the risk assessment and measures put in place.

Contractors: Where the School employs Contractors, the COO and Estates Director ensure that the terms of any contract they enter into requires the Contractor to employ staff to work with, or provide services for the School, to adopt and implement the measures described in this policy. They are also to monitor the Contractor's compliance and are to request that the Contractor and their staff have Enhanced DBS clearance for working frequently or intensively anywhere on the School site. The HR Department maintains a List of Registered Contractors to confirm those Contractors who have Enhanced DBS clearance. Contractors are required to show photo ID to support the DBS disclosure certificate. Photo ID should also be requested at the point of signing the Contractors Register to prove identity when working in School.

Agency Staff: Tonbridge School will endeavour to fill short term staff absences through internal cover and re-deployment of existing staff. However, there are occasions where it becomes necessary to utilise the services of a supply agency to support our recruitment needs. In these situations, the following guidelines apply (and are conditions of the contract drawn up with the supply agency):

- The supply agency **MUST** provide written notification to the HR Department that all appropriate safeguarding checks have been made before a supplied person can commence work at Tonbridge School;
- The HR Department **MUST** have sight of the original copy of the DBS certificate before a supplied person can commence work;
- The person offered for supply must satisfy the identity checks that all employees of the School are subject to (irrespective of any previous identity check);

In addition, Tonbridge School does all it can to ensure that staff employed by other organisations, but working with our boys, are appropriately vetted.

Further details on the School's recruitment processes, including recruitment checks undertaken, can be found in the Staff Recruitment policy.

5. CODE OF CONDUCT / STAFF RESPONSIBILITIES

All colleagues are made aware of their roles and responsibilities with regard to issues such as duty of care, position of trust, behaviour, one-to-one situations use of physical restraint and awareness of School policies at induction and through the provision of Policies and Handbooks as detailed above. This advice is based on Guidance for Safer Working Practice for those working with Children and Young People in education settings. There is also a clear and published Code of Conduct for all staff which outlines these roles and responsibilities and to which all staff are expected to adhere.

Staff should not behave in a manner which would lead any reasonable person to question their suitability to work with children (this might involve misuse of drugs, alcohol or acts of violence or inappropriate use of social media). In addition, staff must be even-handed, consistent and unambiguous in the way they treat boys, avoiding any actions that would be considered 'unprofessional'. For instance, the verbal

slighting in public of a boy (or indeed another member of staff), whether intended or unintended, would be regarded as unprofessional.

Staff should not have current boys as their 'friends' on social networking sites.

Fuller guidance and advice is available to staff in the Tonbridge School Handbook and in the Code of Conduct.

6. BOY WHO HAS (OR SEEMS TO HAVE) GONE MISSING

The supervision and monitoring of boys during the School day is outlined in the Attendance and Pupil Supervision policies and is the responsibility of all staff.

For a day boy who is absent from School at the morning registration session, the School Reception should contact the parents in the first instance to establish the whereabouts of the boy. For unexplained absences at the afternoon registration session, the Housemaster will make contact with the parents.

Any unauthorised absence from a lesson must be reported to the Housemaster as soon as possible.

For a boy actually to 'go missing' is a very rare occurrence indeed and in these situations the Housemaster's first responsibility to the parents is to safeguard and promote the welfare of their sons. This is, therefore, a critical issue. Housemasters have to consider the options and their response will be a matter of judgment. The most worrying time is late evening or if the boy has disappeared overnight and is not in breakfast. Given the rarity of such an event and the potential for significant harm to occur to a student who has gone missing it is expected that a Housemaster will deal with any uncharacteristic or unexplained absence as a priority, likely involving discussion with Headmaster or Second Master or Deputy Head Pastoral.

Step One: informal checks and contact

- The House should be checked, including the House sign out sheets. The Housemaster should check whether the boy is on a School fixture or trip, at the gym or a drama rehearsal etc.
- If that proved negative, the Housemaster should attempt to contact the missing boy on his mobile device. The mobile numbers of the boys are held on the School database to which all staff have access via Firefly.
- If that fails, it may be because the boy has not informed the School of a change to his mobile number so the Housemaster should ascertain from his friends whether they know his most up-to-date number and also whether they know the whereabouts of the missing boy.
- The degree of concern will vary a little with the age of the boy, the time of day, the time of year and weather, and the time elapsed from when he was last seen but it is important that the Housemaster seeks to identify his whereabouts.

Step Two: When the Housemaster, after all informal checks, believes that a boy has gone missing, the following must happen **immediately**:

- The Deputy Head Pastoral, Second Master and the Headmaster must be informed; The Deputy Head Pastoral, Second Master and the Headmaster can at this point instruct Porters to search likely areas of the School, depending on the time of day and the boy, and/or check CCTV footage to try and locate the boy.
- The boy's parents must be notified and to check that the boy is not at home; Parents might also be able to check the locations of the boys' phone through an App like 'Find my phone'.
- In conjunction with the Second Master/Headmaster and the boy's parents, the boy should be listed as a 'missing person' with the police who will advise the School on any subsequent actions.

It is important that at each stage the staff involved record the actions and decisions taken, so that a formal written record of the episode is kept.

Full details of the procedures are in the separate policy.

7. COMPLAINTS AND WHISTLEBLOWING

Tonbridge School recognises that it is possible for staff and volunteers to behave in a manner that causes harm to children, and takes any allegation made against members of staff or volunteers seriously. All staff receive induction and ongoing reminders about the School's Whistleblowing policy and procedures: when staff have concerns about the conduct of a colleague, the School's Whistleblowing Policy enables them to raise concerns in confidence and for a sensitive enquiry to take place.

Where a parent or boy raises a concern about poor practice, the published complaints procedure is available, either through the Parents' Handbook or on the School website.

The NSPCC runs a whistleblowing national portal for child abuse related reports, commissioned by the Home Office. Contact details can be found in Section 3. of this policy.

Full versions of the Whistleblowing Policy and the Complaints Policy are available on the School's website.

8. ANTI-BULLYING and CYBERBULLYING

Tonbridge School supports the right of all members of the School community to be free from all forms of bullying, harassment and discrimination. We wish to create and maintain a caring and supportive School environment by making clear that bullying will not be tolerated and that positive steps will be taken to eradicate it. We aim to create an atmosphere in which staff, parents and boys are encouraged to bring out into the open any incident of bullying, knowing that measures to deal with it will have the support of the whole School community. Our Anti-Bullying Policy is based in large part on the views of the boys themselves, who are encouraged to feel that they are the owners of it. It represents the School's promise to address problems of bullying and do all that it can to prevent them.

9. ONLINE-SAFETY POLICY, and the CYBERBULLYING and ACCEPTABLE USE of COMPUTERS POLICIES

These Policies build on government guidance listed above and in the policies themselves and are applied in conjunction with other associated policies. The DSL serves as the Online-Safety Officer. The aims of the Online-Safety Policy are:

- To promote the welfare and safeguarding of boys and staff at Tonbridge School.
- To ensure that boys are ICT literate and can use the facilities to ensure that their educational provision is enhanced to the maximum.
- To promote responsible and effective use of electronic communication (including the use of the internet and mobile phone technology).
- To educate boys and staff about the risks and responsibilities and potential criminal implications involved in the use of technology.
- To raise awareness of and counter instances of cyber bullying.
- To ensure that boys and staff know how to deal with any incidents of concern in relation to online safety.

The DSL supported by the Digital Wellbeing Co-Ordinator, leads an effective whole School community approach to online safety to protect and educate pupils, students, and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>). The School has robust filtering, monitoring and flagging systems in place to protect boys from accessing inappropriate material online. The School has a clear policy on the use of mobile and smart technology which reflects the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The School can confiscate and search any boy's device if there is concern about his online behaviour.

Staff undergo regular updated online safety training both as stand-alone sessions and within the overall context of safeguarding training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

10. TAKING, STORING AND USING IMAGES OF BOYS

Tonbridge School recognises that every member of the School community has a right to privacy under both human rights and data protection legislation and that this right must be respected in all activities. School policy is that consent for all such photography is granted via the contract between the parent and the School, and in staff contracts of employment, but that any boy, parent or member of staff is entitled to withdraw such consent either generally or for any specific occasion or purpose by written instruction to the Second Master, or for members of the support staff, to the COO. In all such cases the School will respect the wishes and the image rights of the individual.

This policy will be subject to certain safeguards as set out below:

- Where general or specific consent is withheld by a boy or parent, the Deputy Head Pastoral will ensure that all staff are informed, and the School will make every effort to comply sensitively with the request.
- Any images of boys which are used by the School must conform to appropriate standards of integrity and decency and must avoid any possibility of embarrassment to the subject of the photograph.
- Boys must not take any images of each other or other members of the School community which would be regarded as inappropriate. Electronic or mobile phone transmission of such images without consent is a School disciplinary offence.
- School management will ensure that appropriate controls are imposed on images recorded on CCTV. Such images will be retained securely and only viewed by designated members of staff responsible for School security.
- It is a disciplinary offence for any a boy or member of staff to publish or transmit any image which brings the School into disrepute.

11. HEALTH AND SAFETY

Tonbridge School fully recognises its responsibility to minimise potential risks for all those who use the site and for those engaged in School activity off site. The School organises its Health and Safety affairs in accordance with the principles and guidance set out in HSG 65 "Managing for Health and Safety" published by the Health and Safety Executive. The School's Governors and Senior Management also follow the guidance contained in INDG417 "Leading Health and Safety at Work", and aim to follow the three principles underlying this guidance:

- Strong and active leadership from the top:

- ensuring visible and active commitment from the board, establishing effective “downward” communication systems and management structures, and integrating good Health and Safety management with business decisions.
- Staff involvement:
 - engaging all staff in the promotion and achievement of safe and healthy conditions, enabling effective “upward” communication and providing high quality training.
- Assessment and review:
 - identifying and managing health and safety risks, accessing (and following) competent advice, and monitoring, reporting and reviewing performance.

In addition, School policy has regard to ‘Health and Safety: Advice on Legal Duties and Powers for Local Authorities, Head Teachers, Staff and Governing Bodies.’

In addition to the policies outlined above, Tonbridge School encourages an environment where boys feel secure, are encouraged to talk, and are listened to, and where the experiences of boys are regularly monitored. The boys are taught about safeguarding and we aim to ensure that they can recognise when they are at risk and how to get help when they need it. We aim to achieve this through the measures listed below:

A. BEHAVIOUR, REWARDS AND SANCTIONS POLICY

Tonbridge School Behaviour, Rewards and Sanctions Policy is designed to ensure an acceptable standard of behaviour in and around School, travelling to or from School, and on any School activity. It is based on clear values which the School promotes; these include self-discipline, a sense of responsibility, a proper regard for authority, respect for and celebration of difference in others, and a sense of service to the community. It places emphasis on the positive behaviour to be expected and rewarded, as well as prevention of what is unacceptable through a series of clearly defined sanctions. At its heart is the promotion of a good learning and teaching atmosphere in which all boys can realise their potential. The policy safeguards and promotes the welfare of all boys, protecting them from all kinds of discrimination and harassment. It recognises the duty of the School to promote race and gender equality and to take action to tackle inequalities and discrimination of any kind that are identified, including with respect to boys who have special educational needs. It relies on a culture of mutual respect between parents, boys and staff, and it has been drawn up in wide consultation with the School community and takes into account the non-statutory guidance given in ‘Behaviour and Discipline in Schools’ (January 2016) and the Equality Act of 2010. It will be subject to regular review by the Second Master in consultation with others. The Behaviour, Rewards and Sanctions Policy has four main elements:

- ‘Expected Behaviour at Tonbridge School’ – a code to be promoted, taught and enforced.
- A System of Rewards for Achievement, Effort and Good Behaviour.
- A System of Sanctions.
- A Statement of Roles and Responsibilities.

It is important that this policy should be read and applied in conjunction with other School policies and programmes and Handbooks.

B. STUDENT VOICE

Boys are encouraged to voice their opinions through regular meetings of School and House councils, Food Councils, the Overseas Student Council; representation through the network of Heads of School, School Praes and House Praes; pupil feedback in Termly Monitoring Visits to Houses; pupil feedback in Teaching Staff Appraisals and through the use of questionnaires by the Deputy Head Pastoral and Lower Master, as well as regular meetings with their tutors and through the use of the termly monitoring visits of Houses by the Deputy Head Pastoral and the Second Master. Boys are regularly given the opportunity to speak in Chapel.

C. REGULAR PASTORAL TEAM MEETINGS

Each Housemaster manages a team of individuals with responsibilities in the House (including tutors and matrons). These Teams meet regularly throughout the term to share information about the boys in their care. Minutes are forwarded to the Deputy Head Pastoral and the Second Master who scrutinise them.

D. DSL WEEKLY MEETING

The DSL chairs a regular meeting with the DDSLs to review and discuss current Safeguarding issues. Discussions are confidential to the group, and it provides a protected time for the DSL team to actively monitor and review the use of CPOMS. As with all safeguarding matters the DSL keeps the Headmaster informed in his regular meetings with him.

E. THE WELFARE GROUP

This group includes the Deputy Head Pastoral, who chairs the group, the School Counsellor, the Sister-in-Charge of the Medical Centre and the Second Master. The group invites Housemasters, Matrons and other pastoral staff to raise concerns about boys and looks at ways in which boys who have welfare needs can be supported both internally and by external agencies (e.g. CAMHS). Discussions are confidential to the group. The Headmaster is regularly informed of these discussions and any significant concern or active advice for Housemasters and Matrons is shared. Active monitoring and review by Housemasters of boys with welfare needs is informed by the discussions of the Welfare Group.

F. GOVERNORS' VISITS

Members of the Governors' Pastoral Committee regularly visit the Boarding and Day Houses to have lunch with the boys, talk to the Matron and to the Housemaster. Senior Student Houses are visited once every two years. A report of each visit is given to the full Pastoral Committee where any issues are discussed and addressed.

G. TERMLY MONITORING VISITS

The Deputy Head Pastoral and the Second Master formally review each House every term and talk to boys about their experiences in the Houses. There are also plenty of opportunities to talk to the boys informally during lunch in the Houses. Senior Student Houses are visited once a year.

H. PASTORAL EDUCATION (PSHEE)

Tonbridge School aims to provide a caring and enlightened environment in which the talents of each individual flourish. We encourage boys to be creative, tolerant and to strive for academic, sporting and cultural excellence. Respect for tradition and openness to innovation are equally valued. A well-established House system at the heart of the School fosters a strong sense of belonging. Tonbridge seeks to celebrate its distinctive mixture of boarders and day boys, as well as the contribution of our international students; this helps to create a unique broadening and deepening of opportunity. Ensuring an effective Pastoral Education Programme, including Relationship and Sex Education (RSE), is in place promotes wellbeing, a healthy, fulfilled and responsible lifestyle, and strengthens emotional intelligence. Above all it promotes informed and positive decision making, whilst encouraging respect for other people, as well as teaching boys to celebrate difference, especially in respect to race, religion, sexual orientation, gender, special educational needs, disability and family dynamics.

I. THE PREVENT DUTY AT TONBRIDGE SCHOOL

Tonbridge School is committed to providing a secure environment where boys feel safe and are kept safe. All adults in our School recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for boys or not.

There is no place for extremist views of any kind at Tonbridge whether from internal sources – boys, staff or Governors, or external sources – the wider School community, external agencies or individuals. Boys at Tonbridge see our School as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this; we have a duty to ensure this happens. We therefore will provide a broad and balanced curriculum, delivered by skilled professionals, so that our boys are

enriched, understand and become tolerant of difference and diversity and are in an environment where they thrive, feel valued and are not marginalised.

Annex 1: Job Description for the Designated Safeguarding Lead (DSL)

Tonbridge School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The School will provide opportunities for regular external review of the role of the Designated Safeguarding Lead (DSL).

The DSL is the Deputy Head Pastoral, Mr C.J.C. Swainson. In his absence, one of the Deputy Designated Safeguarding Leads will carry out these duties and this Job Description applies to them in those circumstances.

Summary of the role	The DSL: • will take lead responsibility for all child protection matters arising at the School and will support all other members of staff in relation to any safeguarding or child protection concerns that arise • will undergo appropriate and regular training in order to fulfil his duties • has the status and authority within the School to carry out the duties of the post including committing resources, arranging training, supporting and directing other staff to safeguard and promote the welfare of children • is responsible for maintaining an overview of safeguarding within the school, to maintain open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in place • is also the online safety officer and has responsibility for policies surrounding online safety including understanding the filtering and monitoring systems and processes in place • is responsible for receiving and reviewing child protection files from the Schools of boys arriving at Tonbridge, and for liaising with the DSL from those Schools, when appropriate, for the best care and the smooth transition of a boy to Tonbridge • is responsible for keeping detailed, accurate, secure records of concerns, allegations and referrals for any Child Protection issues. • will communicate regularly with the Governor responsible for Child Protection (Dr Nicki Perry) and will discuss with her any cases of concern. They will meet annually for a formal review of Safeguarding. • will attend the Governors' Pastoral Committee to discuss Safeguarding practice in the School • will keep the Headmaster informed of all concerns and allegations relating to Safeguarding and Child Protection.
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Main duties and responsibilities	To take lead responsibility for safeguarding and child protection (including online safety). Managing referrals • To refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care; • Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme; • refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and • refer cases where a crime may have been committed to the Police as required. Work with others The designated safeguarding lead is expected to: • Act as a source of support, advice and expertise for all staff; • Act as a point of contact with the three safeguarding partners; • liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member; • liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENDCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and • promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of boys, including where families may be facing challenging circumstances. • work with the Headmaster and ST, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School. This includes: ensuring that the School knows who its cohort of boys who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help boys who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
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Raising awareness

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Headmaster and Governors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that boys, including boys with a social worker, are experiencing, or have experienced, with teachers and the School leadership staff.

Information sharing and managing the child protection file

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice. Where boys leave the School (including in year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for SEN in colleges, are aware as required. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within School, and with other schools and colleges on transfer including in-year and with the safeguarding partners, other agencies, organisations and practitioners;
 - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during School hours) for staff in School to discuss any safeguarding concerns.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff should consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all boys feel heard and understood. Therefore, the DSL (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to boys and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them, and,
- understand the difficulties that boys may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Line management duties and responsibilities	The DSL will: • line-manage the Deputy Designated Safeguarding Leads (The Second Master, Mr John Bleakley, the Lower Master, Mrs Josie McNeil, the Chaplain Rev David Peters and the Manager of the Tonbridge School Centre, Mr Alex Lloyd) • work with the COO and the HR Director to ensure appropriate vetting and checks are made and recorded for new staff • support Housemasters, Matrons and other Pastoral staff who have responsibility for any boy for whom there are Safeguarding or Child Protection Concerns • line-manage the School Counsellor and the Sister-in-Charge of the Medical Centre chair the Welfare Group, which reviews all boys of concern
Training and Induction of Staff	The DSL will: • liaise with the HR Director and the Second Master to ensure that all new Staff and Governors receive appropriate induction in relation to the School's Safeguarding and Child Protection policy and practice, including other key Safeguarding policies such as those relating to Whistleblowing, the Staff Code of Conduct and Behaviour Rewards and Sanctions. • will arrange whole School staff training in Child Protection on a regular basis – at least every three years • will be responsible for providing Staff and Governors with regular updates on Safeguarding and Child Protection as appropriate • liaise with the Director of HR to maintain a record of staff training work with the Lower Master, the Head of Pastoral Education, the Director of ITD and the Head of Digital Creativity to oversee training and information provided for Staff, parents and boys relating to Online Safety
The DSL's training	The Designated Safeguarding Lead (and deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years, although in practice they will complete the Kent County Council DSL refresher training annually. The Designated Safeguarding Lead should undertake Prevent awareness training. Training should provide Designated Safeguarding Leads with a good understanding of their own role how to identify, understand and respond to specific needs that can increase the vulnerability of boys, as well as specific harms that can put boys at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they: • Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements; • understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of boys;

	• understand the lasting impact that adversity and trauma can have, including on boy's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes; • have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; • be alert to the specific needs of children in need, those with Special Educational Needs or Disabilities and young carers; • understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; • understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners; • are able to keep detailed, accurate, secure written records of concerns and referrals; • understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation; • are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school; • can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture of listening to boys and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
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