



SAFEGUARDING (CHILD PROTECTION) POLICY

Safeguarding is everyone's primary responsibility

Author	Director of Safeguarding	Date: September 2021
Reviewed by	Head Master Lower Master HR Director Deputy Head, Pastoral	Date: September 2021
Approved by ELT		Date: September 2021
Adopted by Provost & Fellows		Date: September 2021

Date of Next review	Director of Safeguarding	September 2022
Regulatory Compliance	Independent School Standards Regulations (2014) National Minimum Standards for Boarding (2015) Keeping Children Safe In Education (2021)	
Publication	Firefly Parent Portal External Website	

CONTENTS

1.	Introduction.....	3
2.	Policy Aims.....	3
3.	Safeguarding contact details.....	5
4.	Policy Details	6
4.1	A Listening School	6
4.2	Types of Abuse.....	6
4.3	Procedure to Follow	7
4.4	What to do if someone makes a disclosure – ‘The Six Rs’	8
4.5	What to do if you suspect a pupil is suffering or likely to suffer harm	9
5.	Concerns about a Pupil.....	10
5.1	Early Help, Child in Need, Child at Risk	10
5.2	Pupil at risk of immediate harm.....	10
5.3	Pupil at risk of radicalisation.....	11
5.4	Pupil missing from education	12
5.5	Child Exploitation	12
5.6	Peer on peer abuse	13
5.7	Online Safety.....	15
5.8	Safeguarding SEND pupils	15
5.9	Safeguarding international pupils	15
5.10	Safeguarding and Mental Health	16
5.11	Pupils who are looked after children, or were previously looked after children	16
5.12	Pupil reporting Honour Based Abuse (HBA).....	16
5.13	Child Abduction	16
5.14	Dealing with allegations against a pupil.....	17
6.	Concerns about a member of staff	17
6.1	Child protection concerns	17
6.2	How to raise a concern about an adult.....	18
6.3	What happens when an allegation has been made?.....	18
6.4	How an individual will be treated if an allegation is raised against them.....	19

6.5	Reporting low level concerns about adults working for or on behalf of the College.....	19
6.6	Whistleblowing Procedure.....	20
7.	Management of Safeguarding.....	20
7.1	Safer Recruitment.....	20
7.2	Staff training.....	21
7.3	Staff Code of Conduct.....	22
7.4	Responsibilities of staff members.....	22
7.5	Responsibilities of the Designated Safeguarding Lead (DSL).....	22
7.6	Data Protection and GDPR.....	25
8.	Governance Arrangements for Safeguarding.....	25
	Appendix A: Disclosure Form.....	26
	Appendix B: Signs of Abuse	28
	Appendix C: Keeping Children Safe in Education	29
	Appendix D: Staff Code of Conduct.....	29

SAFEGUARDING (CHILD PROTECTION) POLICY

1. Introduction

Safeguarding is everyone's primary responsibility

- 1.1 As a school, Eton College recognises its moral and statutory responsibility to safeguard and promote the welfare of all its pupils and those enrolled on its courses. Every employee, Fellow, contractor or volunteer who assists at the College is under a general legal duty:
- To protect children from abuse
 - To be able to identify welfare concerns among pupils and to identify pupils who need additional support
 - To be aware of the school's child protection procedures, to know how to access them and to follow them
 - To keep a record of any significant event, complaint or conversation
 - To report any matters of concern to the Designated Safeguarding Lead (DSL)
- 1.2 This document gives very clear instructions regarding what you should do if you hear or see anything that gives you concern that a pupil at the school may be at risk of harm.
- 1.3 Everyone at Eton should always maintain an attitude of **'it could happen here'** where safeguarding is concerned. When dealing with the welfare of a pupil, you must always act in the best interests of the pupil. You must understand your responsibility to safeguard children and you must appropriately share any concerns that you may have about a pupil.
- 1.4 You should be prepared to identify any pupil that is a 'Child in Need' or would benefit from 'early help', providing support as soon as a problem emerges. In the first instance you should discuss your concerns with the Designated Safeguarding Lead, who may also liaise with other professionals to support early identification and an early help assessment. Such cases will be kept under constant review and consideration will be given to a referral to the Royal Borough Local Safeguarding Partners if the pupil's situation is not improving.
- 1.5 There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. **If a child is in immediate danger or is at risk of harm, a referral to the Local Safeguarding Partners and / or the police should be made immediately.** Anyone can make a referral although the Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.
- 1.6 Due to the specific safeguarding issues caused by the College's unique location (spread across a geographically wide area and containing a main road and various rights of way), along with issues that arise from the College's status as a world renowned tourist destination, staff are reminded to be 'ever vigilant' whilst on campus.

2. Policy Aims

- 2.1 This policy applies at Eton College and is designed to ensure the welfare of pupils and visiting young people both at Eton College and on authorised activities away from school, such as school trips and expeditions. The policy is reviewed and updated annually or when required by legislative change.
- 2.2 We operate our processes with the best interests of the pupil at their heart. We are proud to operate a culture of safety, equality and protection. Where there is a safeguarding concern, we will try to ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. We manage this by encouraging pupils to be open and frank about their concerns, and providing support from the safeguarding team or other responsible adults in all child protection matters.

Definition of Safeguarding

- 2.3 Safeguarding and promoting the welfare of children is defined in the Department for Education's *Keeping Children Safe in Education* (September 2021) as protecting children from maltreatment; preventing 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; and taking action to enable all children to have the best outcomes.
- 2.4 Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse or neglect (see point 4.2 below). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.
- 2.5 Through PHSE topics, tutorials, and discussions in Houses, pupils are encouraged to gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other pupils. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at school – including the Stephenson Centre for Wellbeing, the Health Centre, the Chaplains, the College's Independent Listener, House Masters, Dames, Tutors and Masters. Pupils are also made aware of external sources of support, including Childline and the NSPCC. Members of 'Pop' and House Captains have received specific training in safeguarding.

Legislation and Guidance underpinning this policy

- 2.6 As with all other schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. Our safeguarding policy has been developed in accordance with the principles established in the following:
- The Children Acts 1989 and 2004
 - The Education Act 2002
 - Independent School Standards Regulations 2014 (ISSRs) – statutory regulations
 - Prevent Duty Guidance for England and Wales (July 2015) – statutory guidance - [link to document](#)
 - The National Minimum Standards for Boarding Schools (April 2015) (NMS) – statutory guidance - [link to document](#)
 - The Use of Social Media for Online Radicalisation (July 2015) – non-statutory guidance - [link to document](#)
 - What to do if you're worried a child is being abused (March 2015) [link to document](#)
 - Children Missing Education (September 2016) – statutory guidance - [link to document](#)
 - Teaching Online Safety in School (June 2019) – non-statutory guidance - [link to document](#)
 - Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2021) – [link to document](#)
 - Disqualification under the Childcare Act 2006 (September 2018) – statutory guidance - [link to document](#)
 - Information Sharing – Advice for Safeguarding Practitioners (2018) [link to document](#)
 - Keeping Children Safe in Education (September 2021) (KCSIE) – statutory guidance - [link to document](#)
 - Working Together to Safeguard Children (September 2018) (WTSC) – statutory guidance - [link to document](#)
 - Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (May 2019) – non statutory guidance – [link to document](#)
 - When to Call the Police – non statutory guidance – [link to document](#)
 - Prevent Duty: Departmental Advice for Schools (June 2015) – non statutory guidance – [link to document](#)

- 2.7 This policy also takes into account the policy and practice of the Royal Borough of Windsor and Maidenhead, particularly the inter-agency safeguarding procedures set up by Local Safeguarding Partners (local authority, chief of police and a clinical commissioning group).
- 2.8 This policy should be read in conjunction with our other policies concerning behaviour namely our Behaviour Policy, Preventing Bullying and Unkindness, our Acceptable Use Policies and the Staff Code of Conduct.

3. Safeguarding contact details

- 3.1 Our **Designated Safeguarding Lead (DSL)** is Alice Vicary-Stott, Director of Safeguarding. She is the first point of contact for any safeguarding matter relating to pupils. If she is not available, you should contact one of the Deputy DSLs as listed below. If for any reason, contact fails and you are concerned that a pupil is in immediate danger please contact Children’s Services directly (details below).

Designated Safeguarding Lead (DSL):		
Director of Safeguarding (Alice Vicary-Stott)	01753 370822 07436 227612	safeguarding@etoncollege.org.uk
Deputy Designated Safeguarding Lead (DDSL):		
Deputy Head, Pastoral (David Gregg)	01753 370827	safeguarding@etoncollege.org.uk
Director of Welfare (Will Evans)	01753 370854	safeguarding@etoncollege.org.uk
Deputy Director of Music (Tommy Foster)	01753 370459	safeguarding@etoncollege.org.uk
Safeguarding Coordinator (Stephanie Evers)	01753 370188	safeguarding@etoncollege.org.uk
Head of Russian (John Greenwood)	01753 370451	safeguarding@etoncollege.org.uk
Master of Economics & Politics (Blair Murray-Cusati)	01753 370109	safeguarding@etoncollege.org.uk
Head of Divinity (Laura Miller-Bridgland)	01753 370415	safeguarding@etoncollege.org.uk
Head Master (where the concern is about a member of staff)		
Head Master (Simon Henderson)	01753 370800	s.henderson@etoncollege.org.uk
Provost (where the concern is about the Head Master)		
Provost (the nominated Fellow for safeguarding)	01753 370123	w.waldegrave@etoncollege.org.uk
EXTERNAL CONTACTS – RBWM CHILDREN’S SERVICES		
LADO Service Referrals: (LADO Manager is Mandy Burrows)		02088 917370 07774 332675
Children’s Services:	08:45 – 17:15 (Mon – Thurs) 08:45 – 16:45 (Fri) Out of hours	01628 683150 01628 683150 01344 786543

- 3.2 You can contact the DSL via the DSL inbox or the DDSLs directly through the safeguarding inbox. The safeguarding inbox is a shared email account which the DSL and all DDSLs have access to. The account is monitored and all members are alerted when a new message arrives. **You can also**

message the team directly via the 'flag it' tool on the Firefly dashboard or phone them directly on the above numbers.

- 3.3 If you believe that a pupil is in immediate danger or at risk of harm, you can make an immediate referral to children's social care and/or the Police. **Anyone can make a referral.** You should inform the DSL as soon as possible that a referral has been made.

4. Policy Details

4.1 A Listening School

We take a child-centred approach and try to ensure that pupils have a voice and are able to express any concerns that they may have. You are reminded that **it could happen here** and that we must always take the concerns of pupils seriously. **Safeguarding trumps everything else** – you must, without fail, make time to listen to any pupil who shows signs of distress or who wishes to confide in you. Victims of abuse will always be supported (regardless of how long it has taken them to come forward). They will be kept safe and never made to feel that they are causing a hindrance by reporting possible abuse. A victim must never be made to feel ashamed for making a report or have their experience minimised.

4.2 Types of Abuse

4.2.1 Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 happen wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can take four main forms:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

4.2.2 **Physical abuse** is 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 a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

4.2.3 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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 others. 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.

4.2.4 **Sexual abuse** involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of 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). Sexual

abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

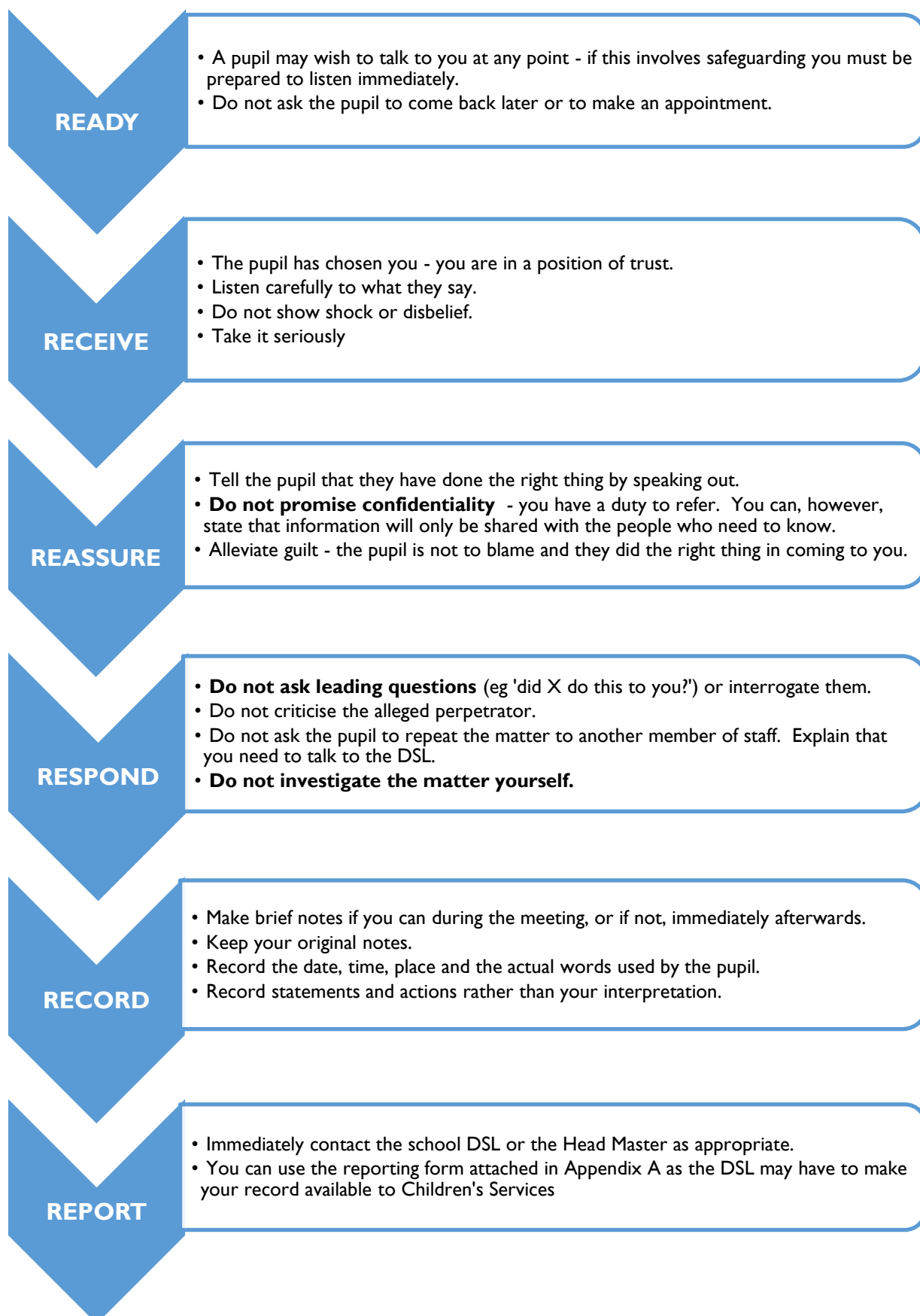
- 4.2.5 **Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- 4.2.6 **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. 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 carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 4.2.7 Appendix B of this policy sets out further detail of possible signs of abuse and of grooming.

4.3 Procedure to Follow

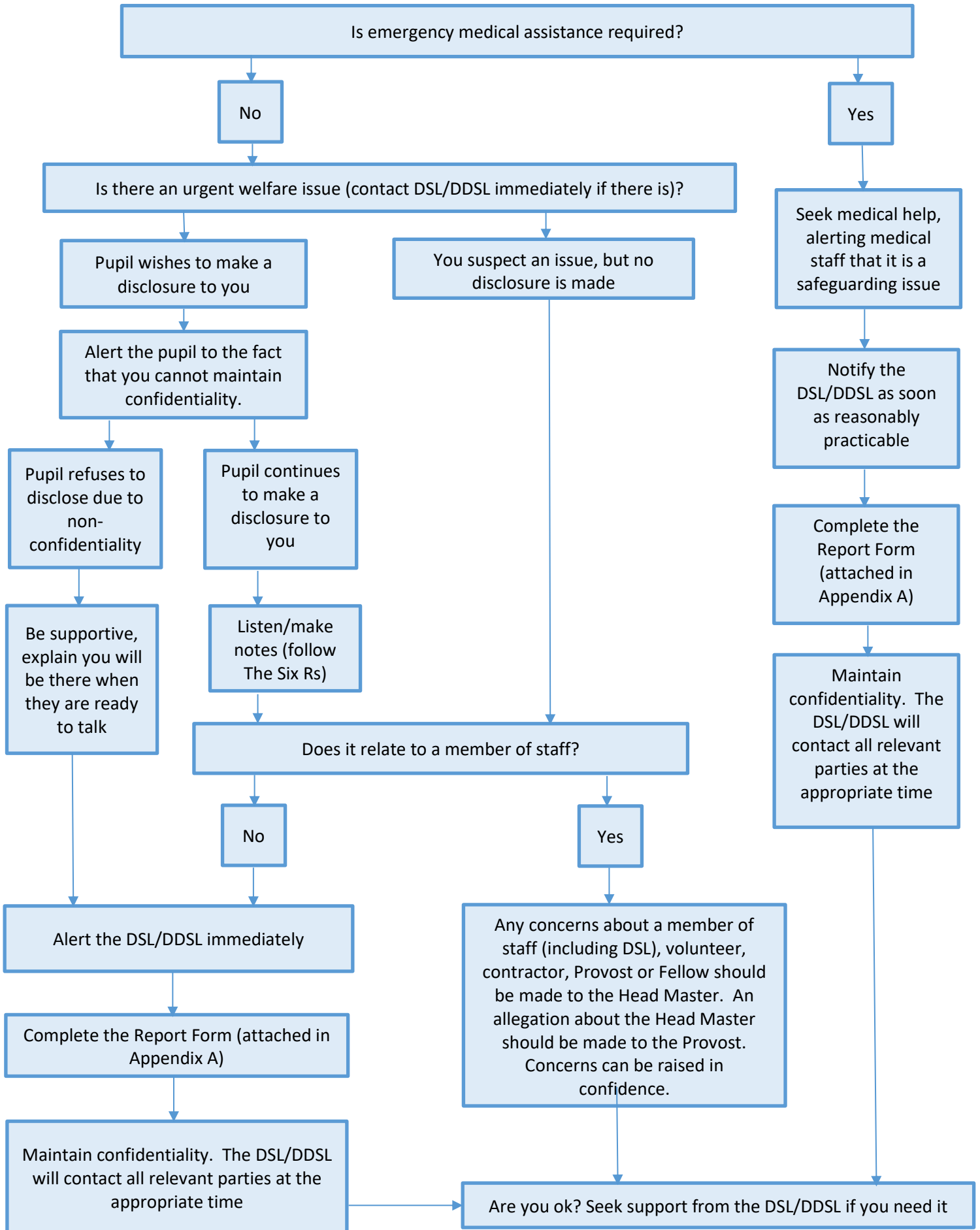
- 4.3.1 We follow specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual, and/or emotional abuse or neglect in accordance with Section 157 of the Education Act 2002.
- 4.3.2 If you are told of any incident or have a strong suspicion of physical, emotional or sexual child abuse or neglect (including attempts to radicalise or coerce individuals to hold extreme political or religious views) occurring in the school, outside the school linked to members of school staff and their families or to a pupil of the school at home or outside the school, you must report this the same day to the DSL (Alice Vicary-Stott). In the absence of the DSL, the immediate report should be made to one of the Deputy DSLs (David Gregg, Will Evans, Tommy Foster, Stephanie Evers, Blair Murray Cusati, John Greenwood or Laura Miller-Bridgland). If the allegation concerns a member of staff the matter must be reported immediately to the Head Master (or to the Lower Master if the Head Master is unavailable). If the allegation or suspicion is about the Head Master, the report should be made to the Provost (01753 370123) or directly to Children's Services (01628 683150) without informing the Head Master.
- 4.3.3 You should report any abuse of a pupil that you become aware of (or suspect) including any abuse that occurs online. This may include possible abuse of a pupil by a staff member or another adult, abuse at home or perpetrated on their family members, abuse by a stranger, and abuse of a pupil/pupils by another pupil or group of pupils.
- 4.3.4 You should be aware that safeguarding incidents and/or risk associated behaviours can be associated with factors outside of the College and occur between young people outside of the school environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside the College (often known as the process of contextual safeguarding). Extra familial harm can take a variety of different forms including (but not limited to) parental neglect, inadequate supervision, sexual exploitation, criminal exploitation and serious youth violence.
- 4.3.5 School staff (including the DSL, the Lower Master and the Head Master) must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by school staff beyond the point at which it is clear that there is an allegation of abuse.
- 4.3.6 If someone tells you about an allegation of physical, sexual, emotional abuse or neglect you must follow the procedures on the next page (**the 'Six R's'**). You should record in writing all concerns, discussions and decisions (together with reasons) made under these procedures. You may use our Disclosure Form (Appendix A) for this purpose if you wish. This record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The record should be signed by the person writing it.

4.3.7 Do not assume another colleague or professional will take action. Safeguarding is everyone's responsibility. If you are worried about a pupil or have any suspicions, however small, talk to one of Eton's safeguarding team immediately. You do not have to wait for proof of your concerns. **Do not attempt to investigate the issue yourself.**

4.4 What to do if someone makes a disclosure – 'The Six Rs'



4.5 What to do if you suspect a pupil is suffering or likely to suffer harm



5. Concerns about a Pupil

5.1 Early Help, Child in Need, Child at Risk

5.1.1 Concerns about a pupil may fall into one or more of several categories, of which the most important are as follows:

5.1.2 **Early Help.** Some pupils may benefit from early help, and you are expected to try to identify such pupils where possible. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if you consider that a pupil may benefit from early help you should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Royal Borough Children's Services referral thresholds. The DSL will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, this will be arranged by Children's Services who will allocate an Early Help worker to the child and may intervene using local processes including use of the 'Common Assessment Framework' (CAF) and 'Team Around the Child' (TAC) approaches.

5.1.3 Any pupil may benefit from early help, but you should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- was a young carer, or who has siblings who have taken on the primary carer role;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
- is frequently missing;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is from a family where circumstances are presenting challenges for the child, such as substance abuse, adult mental health problems, domestic abuse or a family member in prison;
- was previously in care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited; or
- is a privately fostered child.

5.1.4 **A Child in Need** refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. These pupils will be referred to Children's Services and will benefit from additional support which should be put in place as soon as a problem is identified. The school or the Royal Borough's Children's Services team may also refer to external agencies for further advice and support.

5.1.5 **A Child at Risk** is a pupil who is at risk of significant harm (which may or may not be abuse). Such cases will be referred to Children's Services immediately in accordance with the procedures outlined in this policy. The Royal Borough Children's Services thresholds will determine the level of support the pupil requires.

5.2 Pupil at risk of immediate harm

5.2.1 If you believe that a pupil is in immediate danger or at risk of harm, you should make an immediate referral to children's social care and/or the Police. **Anyone can make a referral.** Any such referral must be made immediately and in any event within 24 hours (one working day) of you becoming aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, you should inform the DSL as soon as possible that a referral has been made. You should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made

and the reasons for those decisions should be recorded in writing.

- 5.2.2 The school's Local Safeguarding Partners are the Royal Borough of Windsor and Maidenhead. A full copy of their local procedures can be found [here](#).
- 5.2.3 Specific concerns about immediate harm may arise where pupils are engaged in close one-to-one teaching, for instance in games coaching, individual music lessons, drama or in one-to-one situations with tutors, assistant masters or other school staff.

5.3 Pupil at risk of radicalisation

- 5.3.1 We are fully committed to safeguarding and promoting the welfare of all our pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.
- 5.3.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- 5.3.3 Signs of radicalisation: There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Background factors may contribute to vulnerability and are often combined with influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, you should be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection. You should use your professional judgement in identifying pupils who might be at risk of radicalisation and act proportionately. Such cases may involve a referral to the Channel programme or to children's social care depending on the level of risk. Channel is a voluntary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.
- 5.3.4 We recognise that some pupils may be in danger of being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the police, about the potential risk in the local area. Such risk assessment is discussed with the Head Master, the DSL, Deputy DSLs and the Fellow responsible for safeguarding (currently the Provost) to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The Risk Assessment is regularly reviewed.
- 5.3.5 We take appropriate measures to ensure that visiting speakers are vetted and that they are always accompanied while on school premises. Pupils are encouraged to critically assess the information they receive and oversight ensures that the ideas disseminated are aligned with the values of the school and fundamental British values.
- 5.3.6 Working in partnership: The DSL will maintain existing partnership arrangements and keep open lines of communication with the College's Local Safeguarding Partners.
- 5.3.7 Staff training: The DSL and the Deputy DSLs have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent duty through training. Full details of the Prevent duty can be accessed [here](#).
- 5.3.8 IT: Suitable filtering is provided and periodically reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in school.
- 5.3.9 Procedures: If you are concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e. you should discuss your concerns with the DSL, who will follow the safeguarding procedures outlined in this policy and may also make a referral to the Channel programme. Borderline

cases will be discussed with the Channel Panel on a no-names basis.

- 5.3.10 For further advice about extremism the DfE provide a dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: they can be contacted on 020 7340 7264 or counterextremism@education.gsi.gov.uk or contact 101 (non-emergency number for the police).

5.4 Pupil missing from education

- 5.4.1 A child going missing from education is a potential indicator of abuse. Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where pupils go missing either from school or on a school trip. Details of these procedures are outlined in the Missing Pupil Policy (and Missing Pupil Protocol).
- 5.4.2 We have a thorough attendance monitoring policy and there are clear procedures in place to deal with instances of pupils going missing from school. Each Master is responsible for promptly registering any unexplained absences from his or her divisions, and when it is established that a pupil cannot be accounted for the missing pupil procedure should be triggered without delay.
- 5.4.3 Attendance issues in a boarding environment such as ours are not generally an issue. However, if there are concerns that a child does not appear on time at the end of leaves without clear explanation from parents or guardians, or if there are concerns about the supervision of the child during the holidays or leaves, these concerns should be raised with the DSL.

5.5 Child Exploitation

- 5.5.1 **Child Criminal Exploitation (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 either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas ('**county lines**'). Indicators that may signal a pupil is at risk from or involved with CCE can include increased absences, a change in friendships or relationships with older individuals, a significant decline in performance, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals associated with criminal networks or gangs. If you are concerned you should contact a member of the safeguarding team. Additional advice can be found in Preventing Youth Violence and Gang Involvement ([link here](#)) and Criminal Exploitation of Children and Vulnerable Adults: County Lines ([link here](#)).
- 5.5.2 **Child Sexual Exploitation (CSE):** involves young people who are sexually abused or coerced into sexual activity in the context of exploitative relationships by a person/persons of any age, including another young person. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not have to include physical contact, it can also occur through the use of technology. CSE can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying images they have created and posted on social media). Indicators of CCE (above) can also be indicators of CSE as can pupils who have older partners and pupils who suffer from sexually transmitted infections.
- 5.5.3 **Modern Slavery:** encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Whilst unlikely within a full boarding environment, staff should still be alert for the signs as pupils may be at risk during holiday periods or have friends who are vulnerable to this type of exploitation.

5.6 Peer on peer abuse

- 5.6.1 Abuse can take place between pupils and this type of abuse can be physical, sexual or emotional in nature. This peer on peer abuse can manifest itself in various ways and is most likely to include, but not limited to: bullying (including cyber bullying, homophobic bullying and transgender bullying), gender-based violence / sexual assaults, sexual harassment, initiations and 'sexting' (also known as youth produced sexual imagery). Peer abuse will not be tolerated; abuse is abuse and must not be passed off as 'banter' or as 'part of growing up'. Victims of peer abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with our Behaviour Policy. Further information can be found in the Prevention of Bullying and Unkindness Policy, which can be accessed [here](#).
- 5.6.2 As we are a full boarding school you must be particularly alert to safeguarding pupils against the risk of peer on peer abuse. Children may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for boarding schools that are set out in the National Minimum Standards for Boarding Schools which can be found [here](#). All staff should understand that just because there are no reports of peer on peer abuse within a particular House, tutor group or year group, that it does not mean it is not happening, it may simply mean that it is not being reported, therefore it is vital that staff report *any* concerns relating to peer on peer abuse to the DSL or one of the DDSLs immediately.
- 5.6.3 Peer on peer abuse can take the form of harmful sexual behaviour. Through the PSHE and RSE programmes the school attempts to foster healthy and respectful relationships between pupils, and between pupils and pupils at other schools – both male and female. You must always take seriously any allegation of sexual misconduct, and follow the procedures outlined in this policy if you are made aware of reports of sexual violence or sexual harassment. You should be aware that rape, assault by penetration or other forms of sexual assault (including 'upskirting') are crimes and will be reported to the Police as well as to children's services. Remember that sharing sexual images of a person under the age of 18 ('sexting') is still illegal even if the culprits are under 18 or if the picture is of themselves. We will at all times follow the guidance outlined in the Department for Education document: Sexual Violence and Sexual Harassment between Children in Schools and Colleges (December 2017) which you can read [here](#).
- 5.6.4 Much peer on peer abuse takes place online. It can take place wholly online or technology may be used to facilitate offline abuse. Pupils are regularly reminded of the school's policy on bullying and on cyberbullying, and sign an Acceptable Use Agreement which governs their behaviour on the school network. We work with pupils through an e-Safety committee to give pupils a voice, to consider their concerns and to ensure that our policies are as up-to-date and effective as possible.
- 5.6.5 'Upskirting' is a form of abuse which typically involves taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It has now been classed as a criminal offence. This behaviour, if witnessed, should be notified to the DSL immediately. It is important to note that whilst the phrase is 'upskirting' it can apply equally to men and women as in addition to skirts it also includes photographs taken of people wearing kilts, cassocks, shorts or trousers.
- 5.6.6 Peer on peer abuse can manifest itself in many ways both between pupils at Eton College, and between pupils at Eton College and those of other schools. Some forms of peer on peer abuse are:
- **Bullying:** Bullying is any behaviour that is repeated over time and intentionally hurts another pupil or group of pupils physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email) and always involves an imbalance of power. It can cause long lasting psychological effects. Bullying which amounts to peer on peer abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.
 - **Physical abuse:** this includes hitting, kicking, shaking, biting, slapping, or otherwise

causing physical harm to another young person.

- **Harmful Sexual Behaviour:** refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive or violent behaviours).
- **Serious Youth Crime (including sexual assault):** includes crimes of the most serious nature including murder, rape and GBH perpetrated on or between young people under 18.
- **Sexting:** this is when someone sends or receives a sexually explicit text, image or video. Pressuring someone into sending a nude or sexually explicit picture (forced sexting) can happen in any relationship and to anyone, whatever their age, gender or sexual preference, but extra vigilance is required in a residential setting. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003.
- **Sexual harassment:** refers to 'unwanted conduct of a sexual nature' that can occur both online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other pupils can include:
 - Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
 - Sexual "jokes" or taunting.
 - Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes or displaying pictures, photos or drawings of a sexual nature.
 - Upskirting.
 - Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and online sexual exploitation, coercion and threats.

5.6.7 In the case of abuse by a pupil, or group of pupils, the key issues identifying the problem as abuse are:

- The frequency, nature and severity of the incidents
- Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils significantly older than them or having power or authority over them
- Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable.

5.6.8 Where an allegation of abuse against one or more pupils has been made or where you are concerned about peer on peer abuse, the child protection procedures set out in this policy should be followed and the DSL informed. The pupil(s) accused of abuse and the victim of abuse will both be treated as at risk and a referral will be made to children's social care in respect of either pupil if that pupil is suffering or is at risk of harm.

5.6.9 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, we will ensure that, subject to the advice of the Local Authority Designated Officer (LADO), parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide

support to the pupil.

- 5.6.10 Support for those involved in peer on peer abuse (both parties) will be offered through the Stephenson Centre for Wellbeing, with regular monitoring by the DSL. If Children's Services have been involved then support may be provided through the Early Help or wider safeguarding team.

5.7 Online Safety

- 5.7.1 Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online. We ensure that the school network is appropriately filtered and pupils and staff are guided in the acceptable use of our network and the internet in general (all advice is in line with the Department of Education guidance document, Teaching Online Safety in School 2019). Pupils are required to sign an Acceptable Use Agreement that explains the management of 3G, 4G and 5G at the College and are given advice on keeping safe online through computer technology lessons, specific lectures on e-Safety and within our PSHE and RSE courses.
- 5.7.2 Any evidence that a pupil may be at risk online or indeed being harmed online should be brought to the immediate attention of the DSL or a DDSL so that it can be taken forward as a child protection issue.
- 5.7.3 Staff receive training relating to online safety as part of their regularly updated safeguarding training as well as within their bespoke annual training sessions for academic and house staff.
- 5.7.4 In cases of pupils sexting or sharing pornographic images online, you are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves, therefore when taking a disclosure from a pupil concerning this issue you should avoid viewing or forwarding the image and instead alert the DSL or DDSL to the image's existence.

5.8 Safeguarding SEND pupils

- 5.8.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse or neglect in this group of children. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with special educational needs and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers
- 5.8.2 You must always be prepared to support SEND pupils in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

5.9 Safeguarding international pupils

- 5.9.1 The College is aware of its safeguarding responsibilities in respect of pupils from overseas who are sponsored by the College via the Child Student Route (a study visa). Specifically these duties require that:
- Policies and procedures must be in place to ensure the safety, wellbeing and protection from exploitation of sponsored students.
 - Non-school accommodation must meet the requirements of the route.
 - All teaching and boarding sites must meet legally required standards.

- All staff who have access to pupils must have a current DBS.

This policy therefore covers all pupils at the College, including those here temporarily on exchange visits.

5.10 Safeguarding and Mental Health

- 5.10.1 You should consider 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 issue. However, you are well placed to observe pupils day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.
- 5.10.2 If you have a mental health concern about a pupil that indicates they may be suffering, or at risk of suffering serious harm, you must contact the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads immediately. For mental health concerns that do not meet the safeguarding threshold the pupil can self-refer to the Stephenson Centre for Wellbeing or you or their House Master may make a referral on their behalf via Firefly.
- 5.10.3 The DfE has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition to which, Public Health England has produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#).

5.11 Pupils who are looked after children, or were previously looked after children

- 5.11.1 Pupils who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues. If you have any concerns you should contact Will Evans (Director of Welfare) who is the College's designated member of staff for looked after children. He has overall responsibility for their welfare and progress. In addition to this, he will have up to date assessment information from the relevant local authority, their most recent care plan and contact arrangements for parents and carers.

5.12 Pupil reporting Honour Based Abuse (HBA)

- 5.12.1 Honour based abuse is a general term which includes incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. These may seem irrelevant in a boys' school – they are not. If any evidence of such practices within a family comes to light you must report the matter to the DSL or DDSL immediately.
- 5.12.2 If you learn that an act of FGM appears to have been carried out on a girl aged under 18, you have a statutory duty to report it to the police. You should also follow the usual safeguarding procedures set out in this policy and report the matter to the DSL who will involve Children's Services where appropriate. There is a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available within *Keeping Children Safe in Education* (September 2021). See Appendix C.

5.13 Child Abduction

- 5.13.1 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); or by strangers. All staff should remain vigilant. Further information can be found at: www.actionagainstabduction.org.

5.14 Dealing with allegations against a pupil

5.14.1 When an allegation of abuse is made against a pupil the DSL will inform Children's Services and discuss the allegation with the Local Authority Designated Officer (LADO) in accordance with the procedures outlined in this policy. The threshold for dealing with an issue of pupil behaviour under the safeguarding policy is when there is a reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. We will take advice from the LADO on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. If the matter does not reach the threshold for referral or if there is no intervention by Children's Services or police, the school may nonetheless take action in relation to the allegation in accordance with its own Behaviour Policy and / or the parent contract.

6. Concerns about a member of staff

6.1 Child protection concerns

6.1.1 If you are concerned about the behaviour of a colleague towards a pupil or pupils you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a colleague's career. However, any concern about a member of staff must be raised immediately (see section 6.2) **regardless of how unlikely it seems that there would be any substance to the concern**. No further action may be necessary but it is important that such information is brought to the school's attention as soon as possible. You must remember that in all situations **the welfare of the child is paramount**.

6.1.2 Our reporting procedures for managing concerns/allegations against staff (including Fellows and volunteers) are in line with Part Four of Keeping Children Safe in Education and local safeguarding partner arrangements. They apply when staff have, or are alleged to have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children 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.

6.1.3 When you report a concern of this nature you can expect:

- the concern to be taken seriously;
- your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings;
- to be protected as far as possible from victimisation or harassment;
- for an initial inquiry to take place to identify any action necessary;
- Children's Services and the Police to be involved if the concern relates to abuse or neglect or the potential commission of a crime;
- written confirmation within the timescales given in the [whistle-blowing procedures](#) that your concern has been received and is being dealt with; and
- to be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from the LADO or the Police, communication with the reporting party might not be permissible).

6.1.4 If you feel the school is not dealing with a matter in accordance with our procedures, you should follow the Whistleblowing Procedure, available [here](#).

6.2 How to raise a concern about an adult

- 6.2.1 If you have child protection concerns about the behaviour of a colleague, or about a school practice, which is likely to put pupils at risk of abuse or other serious harm, you **must** report it immediately, using one of the steps outlined below:

Allegations against staff, volunteers or contractors: If you are making an allegation or complaint against any member of staff (including the DSL or a DDSL), volunteer or contractor, you should report it immediately to the Head Master (or to the Lower Master if the Head Master is unavailable). The Head Master may, if appropriate, liaise with the DSL or Deputy DSLs about an allegation concerning a staff member.

Allegations against the Head Master: If you are making an allegation against the Head Master, you should report it to the Provost, or directly to Children's Services (01628 683150) if the Provost is not available, without notifying the Head Master.

Allegations against the Provost or other Fellow: If you are making an allegation against the Provost or another Fellow, you should report it to the Head Master (or to the Lower Master if the Head Master is unavailable).

- 6.2.2 Allegations against a staff member who is no longer working at the school or no longer teaching will be referred to the police and any relevant authorities. Historical (non-recent) allegations of abuse will be referred to the police and to the LADO.

6.3 What happens when an allegation has been made?

- 6.3.1 We will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil, as an immediate priority.

- 6.3.2 If an allegation is made against anyone working or volunteering at the school, we will not undertake our own investigation into the allegation without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations prior to informing the Head Master or Provost for the same reason. In borderline cases the Head Master and Provost are allowed to informally discuss the issue with the LADO on a, 'no names' basis.

- 6.3.3 Once an allegation has been made, which appears to meet the reporting criteria (section 6.1.2) we (either the Head Master or Provost, depending on who the allegation has been made against), will immediately contact the LADO to discuss the nature, content and context of the allegation and agree a course of action. The LADO must be informed within one working day of any allegation reported to the school that appears to meet the criteria or of any allegations that are made directly to the police. All discussions with the LADO will be recorded in writing. We will follow advice from the LADO about how to approach the matter in question, whether the police are to be involved and whether there is to be a strategy meeting. We will also take direction from the LADO as to what we may communicate to:

- a) the person about whom allegations have been made,
- b) the person who has raised the allegation, and
- c) (if it concerns a pupil) their parents.

- 6.3.4 The Head Master or Provost will ensure that the individual against whom the allegation has been made is notified as soon as possible and given an explanation of the likely course of action (unless there is an objection from the police). A named representative will be appointed to keep the individual informed of the progress of the case and to arrange appropriate support.

- 6.3.5 Careful consideration will be given to whether the circumstances of the case warrant suspension whilst the allegation is investigated or whether alternative arrangements can be put in place. Alternative accommodation will be arranged (away from pupils) in cases where a member of boarding

staff is suspended pending an investigation of a child protection nature.

6.3.6 The Head Master or Provost (depending on who the issue was reported to) will, after consultation with the LADO and/or the police, inform the parents and provide regular updates as soon as permissible.

6.3.7 Where an allegation is made against a staff member not directly employed by us such as supply staff or agency staff, the Head Master will immediately contact both the company concerned and the LADO to discuss the nature, content and context of the allegation, in order that all parties can work together to agree a course of action. We will continue to support any investigation that is required.

6.4 How an individual will be treated if an allegation is raised against them

6.4.1 The school's Disciplinary Procedure may apply in the event of an allegation being made. Please read the relevant Disciplinary Procedure document on Firefly for further details.

6.4.2 The College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused person is charged with an offence or the Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

6.4.3 Allegations found to be malicious or false will be removed from the personnel record of the individual concerned. In all other cases a written record of the decision will be placed on their file in accordance with KCSIE and a copy provided to the individual concerned. Allegations which are false, malicious, unfounded or unsubstantiated will not be included within the individual's future references.

6.4.4 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child 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 Services may be appropriate.

6.5 Reporting low level concerns about adults working for or on behalf of the College

6.5.1 Concerns that do not meet the harm threshold are called low level concerns. Examples of these could be using inappropriate language with pupils, being over-friendly, showing favouritism etc. Low level concerns should still be reported in order to encourage an open and transparent culture, enabling the school to identify concerning, problematic or inappropriate behaviour early, to minimise the risk of abuse, and to ensure that adults working in or on behalf of the College are clear about professional boundaries and how to act within those boundaries.

6.5.2 Staff should also feel confident to self-refer a low level concern if they have found themselves in a situation which could be misinterpreted. All low level concern reports will be handled sensitively and proportionately with the primary aim to strengthen systems within the College's safeguarding system and to support individuals to correct behaviour at an early stage.

6.5.3 All reported low level concerns will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose and the action taken. The name of the individual sharing the concerns will also be noted (although if the reporter wishes to remain anonymous this will be respected as far as possible). All records will be kept confidential and stored securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

6.5.4 Low level concerns can be reported via the low level concerns form on Firefly ([here](#)), via email on lowlevelconcerns@etoncollege.org.uk or you can speak to (or email) the Head Master directly. Any concerns raised will be treated with the utmost sensitivity.

6.6 Whistleblowing Procedure

- 6.6.1 You should always feel able to raise concerns about poor or unsafe practices and potential failures in our safeguarding regime. If you have concerns that we are not dealing with a child protection matter in accordance with our stated procedures, you should raise it under the school's Whistleblowing Policy, which can be found [here](#).
- 6.6.2 Alternatively, if you feel that your genuine concerns are not being addressed, you may contact the NSPCC whistleblowing advice line (0800 028 0285 or help@nspcc.org.uk) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with Keeping Children Safe in Education.
- 6.6.3 There will be no retribution or disciplinary action taken against you for making such a report provided that it is done in good faith. Malicious allegations may be considered as a disciplinary offence.

7. Management of Safeguarding

We follow rigorous procedures to ensure that the welfare of pupils is paramount. These include the following:

7.1 Safer Recruitment

- 7.1.1 We take seriously our responsibility to recruit staff, Fellows, contractors and volunteers who are suitable to work with children. The first step to safeguarding all pupils is to appoint staff who share our commitment to the welfare of the pupils. The Recruitment Policy can be found [here](#).
- 7.1.2 We undertake a rigorous recruitment and screening process, which is in line with the Independent Schools' Inspectorate, *Keeping Children Safe in Education* and National Minimum Boarding Standards regulations. The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.
- 7.1.3 We will take all reasonable measures to:
- ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *Keeping Children Safe in Education* (September 2021) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the school's Recruitment Policy.
 - ensure that we carry out all necessary checks on the suitability of people who serve as Fellows in accordance with the above regulations and guidance given in *Keeping Children Safe in Education* (September 2021)
 - ensure that where staff from another organisation are working with our pupils either on Eton property or on another site, we have received confirmation that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children
 - ensure that where the school ceases to use the services of any person (whether employed, contracted or volunteer) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible after the person has ceased to provide services to the school and in any event within one month of the person leaving the school. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA). Reasons for making such a referral would include: unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction, at

any time, for a relevant offence. Failure to make a report when required constitutes an offence, Compromise agreements cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation.

7.1.4 The Human Resources Director is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (2021). This is done in accordance with the school's Recruitment Policy. The HR Director will ensure that the recruitment checks of all employees are retained on the school's Single Central Register.

7.1.5 Additionally, the HR Director will ensure that individuals who are engaged in regulated activity with children, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the Single Central Register where required.

7.2 Staff training

7.2.1 All members of the teaching and support staff receive safeguarding training as part of their induction. The Fellows also receive such training.

7.2.2 During your induction:

- You will be introduced to the Designated Safeguarding Lead (Alice Vicary-Stott) and the Deputy Designated Safeguarding Leads (DDSLs) – David Gregg, Will Evans, Tommy Foster, Stephanie Evers, Blair Murray Cusati, John Greenwood and Laura Miller-Bridgland and learn about their roles. Their photographs and contact details are displayed at many points around the school.
- You will also be trained on our Safeguarding (Child Protection) Policy and procedures; including reading KCSIE Part One and Annex B.
- You will learn how to receive a disclosure from a pupil and what to do if you are concerned about the behaviour of a colleague.
- You will also learn about Prevent awareness procedures, online safety for pupils, and the school's safeguarding response to children who go missing from education.
- You will be informed about the College Whistleblowing Policy, Staff Code of Conduct (which includes acceptable use of IT and staff/pupil relationships) and additional policies relating to safeguarding, including the Pupil Behaviour Policy and the Prevention of Bullying and Unkindness Policy to ensure that you are aware and confident in the use of all procedures relating to safeguarding. Access to all relevant documents will be provided during induction.

7.2.3 Volunteers are provided with safeguarding induction training that includes:

- The school's Safeguarding (Child Protection) Policy
- Part 1 and Annex B of Keeping Children Safe In Education (2021)
- The identity and contact details of the DSL and DDSLs
- Brief guidance notes on our expectations of their behaviour around pupils

7.2.4 Contractors or visitors to the school receive, as a minimum, the identity and contact details of the DSL and guidance on what to do if they are concerned about a child or a safeguarding practice at the school.

7.2.5 The DSL will provide regular update training to all staff throughout the academic year. Update training may take the form of Safeguarding Bulletins, email updates, webinars or presentations during INSET sessions.

7.2.6 Compulsory safeguarding refresher training for all staff will take place on a three-yearly basis or more frequently if required by the College's Local Safeguarding Partners. Training that falls outside the triennial update may be delivered via INSET sessions, bulletins, online courses or assessments. The DSL and Deputy DSLs will attend suitable training in child protection and inter-agency working every two years. All training records are held by the DSL, and **staff will be notified when their training is due to expire and the date of their next training session.**

- 7.2.7 The Fellow with specific responsibility for safeguarding, currently the Provost, will also undergo additional child protection training and updates; this will involve refresher training every two years.
- 7.2.8 You are required to pay attention to safeguarding issues in all areas of school life, for instance but by no means exclusively, risk assessments for trips, the checks required for the recruitment of staff and volunteers (even if they are to be supervised), planning of staff accommodation in boarding houses, exeat arrangements, organisation of external events and so on. You will receive full training if you are involved in any of the above.
- 7.2.9 You will regularly be given guidance to ensure that your behaviour and actions do not place pupils, or indeed yourself, at risk of harm or of allegations of harm to a pupil particularly in situations where you are alone with pupils providing one-to-one tuition or assistance. This guidance may come in the form of Safeguarding Bulletins, email updates, department meetings or addendums to the Safeguarding Policy (such as the Covid-19 addendum covering safeguarding relating to remote learning). In particular, the Staff Code of Conduct provides in depth advice for staff relating to appropriate levels of behaviour. This will be discussed during the induction training and periodically thereafter.
- 7.2.10 Any concerns about a member of staff's behaviour towards a pupil or pupils will be dealt with under the school's Staff Disciplinary Procedure, having particular regard to expert advice on child protection issues involving staff and to our legal obligation to report any possible offences.
- 7.2.11 You will receive regular training and briefings to ensure that you have the skills, knowledge and understanding necessary to keep safe any pupil looked after, or previously looked after, by a local authority. The designated member of staff (Will Evans, Director of Welfare) has responsibility for their welfare and progress, has up to date assessment information from the relevant local authority and has the most recent care plan and contact arrangements with parents, and delegated authority to carers.
- 7.2.12 All staff are trained on how to manage and report a disclosure along with specific guidance relating to managing a report of child on child sexual violence or sexual harassment.

7.3 Staff Code of Conduct

- 7.3.1 The Staff Code of Conduct can be found as a link in Appendix D, on Firefly, or requested as a hard copy document from your line manager. The aim of the Staff Code of Conduct is to provide clear guidance concerning your actions and conduct in order to ensure pupils or staff are not at risk of harm, or of an allegation of harm to a pupil. It sets out the behaviour we expect from all members of staff, and offers specific guidance for staff in boarding houses, delivering tutorials or in one-to-one situations where they may be vulnerable to malicious accusations or for misunderstandings to occur. It also explains the major policies that you must comply with and where to find them.

7.4 Responsibilities of staff members

You must maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a pupil, you should always act in the best interests of the pupil. We all have responsibility for ensuring the welfare of the pupils, and you must always appropriately share any concerns that you may have about a pupil.

7.5 Responsibilities of the Designated Safeguarding Lead (DSL)

- 7.5.1 The Director of Safeguarding (Alice Vicary-Stott) is a member of the school's Executive Leadership team and is the designated senior member of staff who takes specific responsibility for child protection matters in the school. She has received child protection training which is regularly updated every two years by the College's Local Safeguarding Partners; this training is to the highest level in order to be in a position to train other members of staff. She exercises her responsibilities in conjunction with seven Deputy DSLs (David Gregg, Tommy Foster, Stephanie

7.5.2 The main responsibilities of the Designated Safeguarding Lead are:

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- to refer all cases of suspected abuse to the local authority children's social care, working with the Head Master where appropriate;
- to co-ordinate the child protection procedures in the school, ensuring that all school staff are aware of the school's Safeguarding (Child Protection) Policy and procedures and know how to recognise and refer any concerns;
- to maintain an ongoing training programme for all School employees, (including the Provost, Fellows, volunteers and other individuals working at the school), including induction training for all such individuals, and provide regular updates;
- to ensure all members of staff (and volunteers) have read and understood Part I of *Keeping Children Safe in Education* (Department for Education September 2021), and Annex B of KCSIE (Eton requires all its staff members to read KCSIE Part I and Annex B, prior to appointment, as all Eton staff have the opportunity to work directly with children);
- to ensure that senior pupils (House Captains and Members of the Eton Society) are formally trained in safeguarding;
- to monitor the keeping, confidentiality and storage of records in relation to child protection which are kept separate from pupil records;
- to liaise with the Local Authority Designated Officer (LADO) where appropriate, and to maintain a close working relationship with Royal Borough Local Safeguarding Partners;
- to keep parents informed of action to be taken under these procedures in relation to their child;
- to liaise with the Head Master to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- to monitor records of pupils in the school who are subject to a child protection plan to ensure that this is maintained and updated as required;
- to liaise with other professionals to ensure that the school contributes to inter-agency working in line with *Working Together to Safeguard Children* (September 2018). This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children who are subject to child protection plans;
- to ensure that locally agreed inter-agency procedures put in place by the Royal Borough Local Safeguarding Partners are followed;
- to advise and act on all suspicions, concerns and / or evidence of the need for children to receive additional support, or of children who have suffered or are likely to suffer abuse and / or neglect, which are reported to the DSL;
- where appropriate, to take part in child protection conferences or reviews;
- to inform social services in writing when a child who is subject to a child protection plan moves to another school and to ensure the secure transfer of the child protection file to the pupil's new school (sent separately from the main pupil file);
- to ensure that the school keeps and maintains records of staff training on child protection and safer recruitment procedures;
- to monitor the DBS checking process for all who come into contact with children at the school and the operation of the Single Central Register in association with the HR Director, the Head of Compliance and the Provost;
- to notify the Disclosure and Barring Service if the school ceases to use the services of a member of staff (or a Fellow or volunteer) because they are unsuitable to work with children;
- to liaise with the local Channel Panel if a child is deemed to be at risk of radicalisation;
- to refer all cases where a crime has been committed to the Police;
- to provide an annual written safeguarding report to be submitted both to the Standing Committee and one full meeting of the Provost and Fellows annually;
- to attend regular safeguarding meetings (at least once per term) between the Provost (as safeguarding Fellow), the Head Master and the Clerk & Legal Advisor and to keep the

Executive Leadership Team updated on safeguarding matters (confidentiality permitting) on an ongoing basis;

- in conjunction with the College's Clerk & Legal Advisor to refer any serious cases to the Charity Commission;
- to ensure that the Safeguarding (Child Protection) Policy is reviewed annually, or more often if necessary, and the procedures and implementation are updated and reviewed regularly, and to work with the Provost and Fellows regarding this;
- to verify that the Safeguarding (Child Protection) Policy is available publicly and parents are aware of role of the school in referrals about suspected abuse or neglect;
- to be responsible for online safety for all members of the Eton Community;
- should the College offer admission to a pupil who is looked after by a local authority, or previously looked after, the DSL will ensure that staff have the skills, knowledge and understanding necessary to keep safe any boy looked after by a local authority. This would include ensuring that a designated member of staff (Will Evans, Director of Welfare) has responsibility for their welfare and progress, has up to date assessment information from the relevant local authority, has the most recent care plan and contact arrangements with parents, and delegated authority to carers;
- to consider whether pupils are at risk of extra-familial harm including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence; and
- to keep up to date with child protection policies, regulations and developments, including attending relevant training (at least every two years) provided by the Local Safeguarding Partners, the Safeguarding in Education Team or a similar provider.

7.5.3 The main responsibilities of the Deputy Designated Safeguarding Leads are:

- to assume all functions of the Designated Safeguarding Lead in the event of an absence;
- to be appropriately trained in child protection (to the same level as the DSL) in order to carry out all functions necessary to ensure the on-going safety and protection of all pupils. Such training must include regular updates (every two years) in local procedures from the Local Safeguarding Children Board;
- to maintain an effective working knowledge of the Safeguarding (Child Protection) Policy and of Keeping Children Safe in Education, including any updates;
- to act on all suspicions/concerns and/or evidence of the need for children to receive additional support, or of children who have suffered or who are at risk of suffering harm;
- to monitor the Safeguarding Inbox as required by the Designated Safeguarding Lead and to act upon any child protection concerns that arise, or to refer these directly and without undue delay to the Designated Safeguarding Lead (or the Head Master where appropriate);
- to monitor the Safeguarding Alerts Inbox (which monitors the safe and appropriate use of the Eton network by staff and pupils) and to act upon any child protection concerns that arise, or to refer these directly and without undue delay to the Designated Safeguarding Lead or the relevant House Master/line manager;
- to attend internal safeguarding training and from time to time deliver safeguarding training to members of the Eton community,
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding,
- to understand the local authority referral procedures for child protection and to decide when to make a referral by liaising with relevant agencies,
- to oversee and deal with any child protection concerns as requested by the Designated Safeguarding Lead,
- to keep the Designated Safeguarding Lead apprised of all safeguarding concerns currently being monitored by the Deputy Designated Safeguarding Lead,
- to participate in regular safeguarding meetings with the Designated Safeguarding Lead and other Deputy Designated Safeguarding Leads, sharing information as appropriate,
- to keep accurate, detailed and confidential records of all concerns, ensuring that all such records are stored securely and are kept separate from the pupils' general files;
- to update CPOMS correctly and in a timely fashion; and
- in the absence of the Designated Safeguarding Lead, to contribute to inter-agency working with external bodies in line with Working Together to Safeguard Children (March 2015).

7.5.4 The DSL and the DDSs have the appropriate authority and are given the necessary time, funding,

training, resources and support to carry out their role.

7.6 Data Protection and GDPR

- 7.6.1 The Data Protection Act (2018) and GDPR does not prevent 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 safeguard and promote the welfare and protect the safety of children.

8. Governance Arrangements for Safeguarding

- 8.1 The Provost and Fellows take seriously their responsibility to uphold the aims of the charity and their duty to promote an environment in which children can feel secure and safe from harm. The Provost and Fellows ensure there is an effective Safeguarding Policy in place, which has due regard to Keeping Children Safe in Education (2021) and that the policy is implemented in practice. They attend the DSL's Safeguarding Training and have confirmed that they have read and understand Keeping Children Safe in Education. A number of Fellows have attended Safer Recruitment Training.
- 8.2 The Provost and Fellows, as a whole, are responsible for ensuring all staff at the College are competent to carry out their safeguarding responsibilities, for creating an environment where staff feel supported in their safeguarding role and are able to raise concerns, and to ensure that staff have regular reviews of their own safeguarding practices so that they obtain the knowledge, skills and experience to improve over time. The Provost and Fellows may delegate the day to day management of this to the Designated Safeguarding Lead and Executive Leadership Team.
- 8.3 The nominated lead member of the Governing body for Safeguarding is currently the Provost. He has the required knowledge, skills and expertise to take leadership of the College's safeguarding arrangements. He meets regularly throughout the year with the Head Master, DSL and the College's Clerk & Legal Advisor to appraise himself of all ongoing safeguarding matters and to ensure that the school's guidance and policies are consistent with regulatory requirements.
- 8.4 The Regulatory and Compliance Committee of the Provost & Fellows has oversight of the College's compliance with the regulatory requirements in respect of Safer Recruitment and Safeguarding set out in the Independent Schools Standards Regulations. It meets twice each academic year.
- 8.5 The Provost also ensures that the DSL provides reports to the full governing body as required and that a comprehensive report is provided on an annual basis. The Provost and Fellows undertake an annual review of School policies and procedures relating to child protection, and of the efficiency with which the related duties have been discharged.
- 8.6 In addition to this, the Executive Leadership Team regularly review whether policy and practice in safeguarding are effective and compliant with current legislation.

Appendix A: Disclosure Form

Can be completed by a member of staff if they wish, to record a disclosure made to them by a pupil.

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Please type or complete in black pen	
Date	
Time	
Place	
Member of staff present and position	
Full name of pupil(s)	
Ask the child to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.	
A non-exhaustive list of the details to be included: <ul style="list-style-type: none">• what was said or done, by whom, to whom and in whose presence• when the incident took place and where• whether the child wishes their parents [or legal guardian] to be informed.	

Any additional comments or evidence

Details may include, for example, any concerns you may have about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of School.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

Signed by:

Print name:

Date:

Appendix B: Signs of Abuse

Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

- the pupil says that he has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour. For example they may become aggressive, challenging, disruptive or withdrawn
- the pupil does not want to change clothes in front of others or participate in physical activities
- the pupil is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the pupil talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the pupil is regularly missing from school or education
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the pupil's development is delayed in terms of emotional progress
- the pupil suddenly loses or gains weight
- the pupil drinks alcohol regularly from an early age
- the pupil is concerned for younger siblings without explaining why
- the pupil talks about running away
- the pupil shies away from being touched or flinches at sudden movements
- the pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the pupil appears neglected, e.g. dirty, hungry or inadequately clothed
- the pupil is reluctant to go home, or has been openly rejected by his parents or carers.

Signs of grooming:

The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting pupils secretly, or without seeking authorisation from House Masters
- collusive behaviours designed to cultivate dependency, such as:
 - unprofessional conversations about other members of staff
 - breaking School Rules over providing pupils with alcohol and
 - 'friending' pupils on social media platforms, contrary to school policy

Pupils who are being groomed at school or elsewhere may

- be very secretive, including about what they are doing online
- have unexplained absences
- have older friends or girlfriends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

You may find it useful to refer to the Department for Education's guidance *What to do if you're worried a child is being abused* (March 2015).

Appendix C: Keeping Children Safe in Education

It is a condition of employment that you read and understand Part 1 and Annex B of the government document *Keeping Children Safe in Education* (2021). The document may be accessed [here](#).

Appendix D: Staff Code of Conduct

The Staff Code of Conduct can be accessed [here](#).