



Kimbolton School
Cambridgeshire

SAFEGUARDING & CHILD PROTECTION POLICY

Policy owner: Designated Safeguarding Lead
Governor Committee: People & Culture
<p>Policy Summary Statement: The purpose of this safeguarding policy is to protect our pupils from harm, abuse, neglect, and exploitation. It establishes clear guidelines and procedures for creating a safe environment, preventing potential risks and ensuring the well-being of all individuals within the school.</p> <p>This policy outlines the responsibilities of colleagues, volunteers and other stakeholders, ensuring they are aware of their roles in identifying and responding to safeguarding concerns. It also provides a framework for reporting and addressing issues. Ultimately, the policy aims to promote a culture of safety, trust and care, where individuals are supported and protected at all times.</p>

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INTRODUCTION

Commitment to Safeguarding

Kimbolton School is dedicated to safeguarding and promoting the welfare of its boarding and day pupils, regardless of age, ability, race, culture, religion, sexuality or class. Safeguarding is integrated into the School ethos. It is the duty of all members of staff including full-time, part-time and volunteers, both teaching and support, to play an active role in ensuring the safety and promoting the welfare of the children in the School's care. Safeguarding is **everyone's** responsibility.

Kimbolton School fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, to have arrangements in place to safeguard and promote the welfare of children.

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18.

This responsibility is more fully explained in the statutory guidance for Schools and colleges 'Keeping Children Safe in Education' (September 2024). All staff must be made aware of their duties and responsibilities under Part One of this document, which are set out below.

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2024, if they are working directly with children. For those staff who do not work directly with children Annex A will be issued.

Through their day-to-day contact with pupils and direct work with families all staff in School have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected or exploited
- Follow the referral process if they have a concern.

This policy sets out how the School's governing body discharges its statutory responsibilities relating to



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safeguarding and promoting the welfare of children who are pupils at the School. Our policy applies to **all** staff and volunteers working in the School including governors. Teaching assistants, mid-day supervisors, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the School and its governors.

It is consistent with the Safeguarding Children Partnership Board procedures.



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There are four main elements to our policy:

PREVENTION through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole School protective ethos;

PROCEDURES for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the categories of abuse are attached (see Appendix 0);

SUPPORTING CHILDREN particularly those who may have been abused or witnessed violence towards others;

PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN

Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents on request and is on the School website.

1.0 PREVENTION

- I.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.
- I.2 The School will therefore:
 - Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to.
 - Ensure children know that there are trusted adults in the School whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.
 - Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
 - Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.
 - Ensure that all School staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy'.

1.3 Preparatory School:



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Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- How to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed.
- How to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed.
- The importance of permission-seeking and giving in relationships with friends, peers and adults.
- That some people behave differently online, including by pretending to be someone they are not.
- The rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them.
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met.
- About the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- That each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know.
- How to recognise and report feelings of being unsafe or feeling bad about any adult or other children.
- How to ask for advice or help for themselves or others, and to keep trying until they are heard.
- How to report concerns or abuse, and the vocabulary and confidence needed to do so.
- Where to get advice e.g. family, School and/or other sources.

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

1.4 Senior School:

Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
- The characteristics of positive and healthy friendships
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
- What constitutes sexual harassment and sexual violence and why these are always unacceptable
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content

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- That, specifically, explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.
- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online). (Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

We deliver key topics using the PSHE Association Scheme of Work, with support from the Kapow programme. These topics include supporting children to recognise if they are feeling safe or unsafe in their relationships with family, friends and online. This includes considering the importance of permission seeking and giving in relationships, and the sort of boundaries which are appropriate both on and offline. Children are encouraged to consider the qualities they would look for in a trusted adult, how to judge whether a secret feels safe or unsafe and how to seek support if they are asked to keep an unsafe secret. Children learn that each person's body belongs to them, the correct language for body parts, including genitals, how to identify unsafe or inappropriate physical contact. With the older children, they learn about what sorts of behaviours constitute abuse and neglect (PS5-6). All children have opportunities to practice seeking help or advice from others, including from their Networks of Support, and develop their problem-solving strategies, which can be applied in a range of contexts.

2.0 PROCEDURES

- 2.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures'. A copy of these procedures can be found on their website:

[Multi-Agency Policies and Procedures | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk/)

If necessary we also follow and have a clear understanding of [the Northamptonshire's Safeguarding Children's Partnership \(NSCP\) procedures and the Four Levels of Need which can be found in the "Northamptonshire Thresholds and Pathways" guidance](#)

2.2 The Designated Safeguarding Lead is:

- Ms Vanessa Garratt: 01480 862041, vkg@kimboltonschool.com

2.2.1 The Designated Safeguarding Persons are:

Mrs Emily Davidson-Smith, ecw@kimboltonschool.com Deputy Designated Safeguarding Lead: 01480 862062

Mrs Laura Hadden, Assistant Head, Deputy Designated Safeguarding Lead – Senior School: 01480 8622267, lah@kimboltonschool.com

Mr Oliver Stokes, Senior Deputy Head – Prep School: 01480 862062, os@kimboltonschool.com



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Mrs Stephanie Lace scl@kimboltonschool.com, Looked After Child Coordinator

The following have also received appropriate Designated Person Safeguarding training

- Mr Will Chuter, Headmaster headmaster@kimboltonschool.com
- Mrs Jenny Agnew, Bursar: 01480 862222 bursar@kimboltonschool.com

The School has also appointed the Assistant Head, Pastoral as Mental Health (Wellbeing) Lead lah@kimboltonschool.com.

The School has also appointed Ms Vanessa Garratt as Online Safety Lead, Domestic Abuse Lead and Prevent Lead.

2.2.2 The nominated Governors for Safeguarding and Child Protection are:

Mrs Tracey Reid and Mr Simon Page

2.3 The Governing Body will:

- 2.3.1 Appoint a Senior member of staff, from the Senior Leadership Team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained staff (Designated Safeguarding Persons), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- 2.3.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2024 Annex C). Please see appendix 4 at the end of the policy.
- 2.3.3 Ensure that the DSL has the appropriate status and authority within the School to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2024, Annex C). Ensure that the DSL and DDSL's have undertaken the two-day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.
- 2.3.4 Ensure that in addition to the formal training set out above, the DSL and DSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.
- 2.3.5 Ensure that every member of staff, volunteers and the Governing Body knows who the Designated Safeguarding Leads, Deputy Designated Safeguarding Lead's and Safeguarding Team colleagues are and the procedures for passing on concerns from the **point of induction**.



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If members of School staff (including volunteers) have concerns about a child, they must raise these with their line manager directly or to one of the Designated Safeguarding Leads/DSLs in the first instance, either in person, or by logging a concern as soon as possible on the Child Protection Monitoring System (CPOMS), ideally within 2 hours of the incident or concern. The Designated Safeguarding Lead will evaluate the concerns and decide upon the appropriate action, which could include whether to make a referral to Children's Social Care in accordance with the procedures outlined in this policy.

Staff are aware they can make a referral direct to the Early Help Hub EHH (01480 376666) or Social Care Referrals (03450 455203 or 01733 234724 if out of hours). If staff refer directly, they should inform the DSL as soon as possible thereafter.

If a child is in immediate danger or left alone, the police should be contacted directly on 999 and an ambulance called (999) where there is need of medical assistance. If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care immediately. Anyone can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point.

If a child and/or parent refuses Early Help, the DSL would refer and seek advice from the Early Help Hub.

Staff are aware of the referral thresholds through their training and their role in the early help procedure and the process for making referrals to Children's Social Care.

- 2.3.6 Ensure that the DSL or a DSL are always available (during School hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSLs are not available. There will always be a DSL-trained member of staff onsite/easily contactable throughout the holidays, weekends and when the School is in session.
- 2.3.7 Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2023.
- 2.3.8 Nominate a governor for safeguarding and child protection who has undertaken appropriate training.
- 2.3.9 Ensure every member of staff and every governor knows:
- the name of the Designated Safeguarding Lead/Deputies and their role;
 - how to identify the signs of abuse and neglect and exploitation, understanding that children can be at risk of harm inside and outside of the School, inside and outside of home, and online.
 - 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
 - how to pass on and record concerns about a pupil/student;
 - that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DSL;
 - what is meant by, and the importance of, showing professional curiosity



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- that they have a responsibility to provide a safe environment in which children can learn;
- where to find the Multi–Agency Procedures on the Safeguarding Children Partnership Board website;
- their role in the early help/targeted support process;
- the process for making referrals to children’s social care;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
- the role of filtering and monitoring and the process for reporting issues

2.3.10 Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be **regularly updated**, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

2.3.11 It is the duty of the ICT staff to ensure that internet access and electronic communication is as safe as possible. The Online Safety Officer and DSL have responsibility for educating staff and pupils in the best safe practice in electronic communication. This includes the importance of pupils safeguarding themselves against grooming. Staff are trained to notice warning signs where this might be taking place. The School operates a filtering system to ensure that pupils are safe when accessing the internet (See [Appendix 11](#), which includes information about Sexting / YPSI).

2.3.12 Ensure that **all** staff, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies, including low level concerns and allegations against staff.

2.3.13 Ensure that parents are informed of the responsibility placed on the School and staff in relation to child protection by setting out these duties in the School. This can be found in the school prospectus and website.

2.3.14 Ensure that this policy is available publicly either via the School website ([Kimbolton School - Policies](#)) or by other means.

2.3.15 Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.

2.3.16 Where pupils are educated off site or in alternative provision, the School and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil’s needs. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the School.

These procedures are led at the School by the DSL. The situation described above is rare at Kimbolton, but on the occasions that a child is being educated off site (and still by the School) the



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DSL makes regular (weekly) calls to parents or in some circumstances directly to the child to check that they are ok.

In the case of alternative provision where the child has moved onto an online school, the child is removed from the School roll.

2.4 Multi-Agency Working

The School will:

- 2.4.1 Work to develop effective links with relevant services to promote the safety and welfare of all pupils.
- 2.4.2 Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2023), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.4.3 Notify the relevant Social Care Team immediately if:
 - it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
 - there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
 - there is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- 2.4.4 When a pupil who is subject to a Child Protection Plan leaves, information will be transferred to the new School immediately. The Child Protection Chair and Social Care Team will also be informed.

2.5 Record Keeping

The School will:

- 2.5.1 Keep clear, detailed, accurate, written records of concerns about children, even where there is no need to refer the matter to Children's Social Care immediately.
- 2.5.2 Records should include:
 - a clear and comprehensive summary of the concern;
 - the child's wishes and feelings;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
 - a record of any discussion/communication with parents, other agencies etc.
- 2.5.3 Electronic records are stored on an identified, purpose-built, secure platform (CPOMS). In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files.
- 2.5.4 Ensure all relevant safeguarding records are sent to the receiving School or establishment when a pupil moves Schools, within five days, in accordance with 'Keeping Children Safe in Education, 2024, (page



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173) and the Cambridgeshire Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.

The DSL will consider whether it would be appropriate to share information with the new School/college in advance of a child leaving.

- 2.5.5 Make parents aware that such records exist, except where to do so would place the child at risk of harm.
- 2.5.6 Ensure all actions and decisions are led by what is considered to be in the best interests of the child and rationales are included for all discussions and decisions made.

2.6 Confidentiality and information sharing

- 2.6.1 Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

The School will:

- 2.6.2 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.
- 2.6.3 Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers' DfE, May 2024).
- 2.6.4 Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL, Headteacher or Bursar.
- 2.6.5 Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/DDSLs will:

- 2.6.6 Disclose information about a pupil to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 2.6.7 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 2.6.8 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2023).



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- 2.6.9 In cases where the 'serious harm test' is met, Schools must withhold providing the data in compliance with Schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt Schools should seek independent legal advice.
- 2.6.10 Seek advice about confidentiality from outside agencies if required. (See 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers' DfE, May 2024).

2.7 Communication with Parents/Carers

The School will:

- 2.7.1 Ensure that parents/carers are informed of the responsibility placed on the School and staff in relation to child protection by setting out its duties in the School prospectus and website.
- 2.7.2 Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- 2.7.3 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if the School believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

2.8 Child-on-Child Abuse

We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

- 2.8.1 All forms of child-on-child abuse are unacceptable and will be taken seriously.

The School will therefore:

- 2.8.2 Create a whole School protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.

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- 2.8.3 Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- 2.8.4 Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter'.
- 2.8.5 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.8.6 Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- 2.8.7 Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding procedures.
- 2.8.8 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. School will ensure that these children have a trusted adult in School to talk to.
- 2.8.9 Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- 2.8.10 The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's Child Sexual Behaviour Assessment Tool. If there is a concern that a young person may be displaying sexually harmful behaviours.

2.9 Dealing with Sexual Violence and Sexual Harassment between children

- 2.8.11 Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same School. 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.

- 2.8.11 Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 2.8.12 Provide training for staff on how to manage a report of sexual violence or sexual harassment.



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- 2.8.13 Make decisions on a case-by-case basis. Allegations against pupils should be reported in accordance with the procedures set out in this policy (see Appendix 3). If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and the School Safeguarding and Child Protection Policy January 2024 children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.
- 2.8.14 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.8.15 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.8.16 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations. All those involved in such allegations, both victim and perpetrator, will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.
- 2.8.17 Liaise closely with external agencies, including police and social care, when required.
- 2.8.18 Refer to 'Keeping Children Safe in Education - Part Five', 2024, for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, March 2024)

2.10 Site Security

- 2.10.1 The School will take all practical steps to ensure that School premises are as secure as circumstances permit. Where services or activities are provided by an external organisation using the School's facilities and premises, assurances will be sought that the organisation concerned has appropriate safeguarding procedures in place.
- 2.10.2 A visitors' book is kept at Reception in the Senior School and Preparatory School and an online visitors calendar is monitored and maintained by Senior School and Preparatory School receptionists. All visitors and contractors are entered into the online visitor's calendar prior to a scheduled visit and DBS numbers added if available. The visitor is then emailed visiting documentation and safeguarding information. All visitors and contractors are required to sign in on arrival and sign out on departure. Any non-vetted visitor or contractor will be escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors and contractors are required to provide proof of ID. In addition, all volunteers and contractors are given a colour-coded name badge which must be clearly always worn. Safeguarding issues are clearly highlighted on the back of the badges. Some contractors may be given a Hi Vis Kimbolton School waste coat to denote that they are a recognised contractor.

2.11 Staff School Accommodation



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No pupil should ever enter the School accommodation of a member of staff; the only exceptions being the accommodation of the Headmaster or Boarding House Parents. This will then only be for legitimate reasons that are in line with the friendly and nurturing family environment which we aim to achieve. Specifically, in White House the houseparents' kitchen and outside eating space will be used to host activities such as house meals and baking, and in Kim House the study will be similarly used. For both Houses there is a clear demarcation point beyond which boarders will not be allowed to go. This includes the use of toilet facilities, for which the boarders will have to use those provided in their own accommodation. In the Headmaster's House, pupils may be hosted in the garden, conservatory, lounge, dining room and hallway, using the guest cloakroom on the ground floor. This is in line with the National Minimum Standards for Boarding Schools, standard 20.10.

<https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards>

3.0 SUPPORTING CHILDREN

The School recognises that **any** child may be subject to abuse and 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 and as such will support all children by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- 3.3 Applying the School's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The School will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
- 3.4 Liaising with the School's mental health leads, where safeguarding concerns are linked to mental health in school for advice on case management.
- 3.5 Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Emotional Health and Wellbeing Service, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
- 3.6 Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- 3.7 The School recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 10 of Keeping Children Safe in Education, 2024 for the complete list. The list includes:
 - 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)



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- 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 or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, 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 alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, or
- is persistently absent from education, including persistent absences for part of the School day.

3.8 Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The School has pupils with emotional and behavioural difficulties and/or challenging behaviours. The School will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how to recognise and manage risk including online. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

The School has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are less able to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the School will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.



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We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

3.8.1 Young Carers

The School recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

The School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

3.8.2 Children at Risk of Criminal Exploitation

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The School recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

3.8.3 Children at Risk of Child Sexual Exploitation

Child sexual exploitation (CSE) 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.

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.



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Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

The School recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

At Kimbolton School we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

3.8.4 Children Frequently Absent from Education

School recognises that children who have unexplainable and/or persistent absences from education, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The School monitors and follows up on the attendance of individual pupils closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence. Tutors follow the Missing Child Policy for pupils who are unaccounted for at any point during the School day. If there are repeat occasions or any safeguarding concerns, the DSL will be informed.

The School endeavours to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern.

When a child is absent from education, the School follows the procedure as set out in Cambridgeshire's Children Missing from Education guidance. The School will inform Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

3.8.5 Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings, the School will consider such action in the following situations:



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When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

3.8.6 Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When the School receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child

3.8.7 Children Living with Domestic Abuse

The Domestic Abuse Act 2021 applies to those aged 16 or over and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending



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on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

The School recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The School will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At Kimbolton School we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings'.

3.8.8 Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation

Honour-Based Abuse can be defined as: 'An incident or pattern of violence, threats of violence, intimidation, coercion, control or abuse (including but not limited to psychological, physical, sexual, economic, spiritual, faith-related or emotional abuse) motivated by the perpetrator's perception that an individual has shamed, or may shame, the perpetrator, the family, or community or has otherwise broken, or may break, the perceived norms of the community's accepted behaviours, including by speaking out about the abuse and where the perception of shame may also prevent a victim from accessing support or help.'

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The School takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.



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The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

The School will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

3.8.9 Children who have returned home to their family from care

The School recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board Multi-Agency Procedures.

3.8.10 Children showing signs of Abuse and/or Neglect and/or Exploitation

School recognises that experiencing abuse, neglect or exploitation may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse, neglect or exploitation may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (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



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intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

3.8.11 Children at Risk of Radicalisation

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a School safeguarding approach.

The Governing Body will ensure that a DSL has undertaken Prevent Lead (which will be updated every two years) and that all staff receive training about the Prevent Duty.

The following members of staff are the Prevent Leads and have undertaken Prevent Lead training:

- Ms Vanessa Garratt, Designated Safeguarding Lead, 01480 862041, vkg@kimboltonschool.com

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The School's Designated Safeguarding Lead (and Deputies) should be aware of local procedures for making a Prevent referral using the Prevent National Referral Form found on the Cambridgeshire and Peterborough Safeguarding website.

[National Prevent referral form \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)

See also Prevent Duty Guidance: for England and Wales, HM Government (March 2024).

3.8.12 Privately Fostered Children

Private fostering is when a child under the age of 16 (under 18 if disabled), is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative, in their own home for 28 days or more.

The School will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Fostering Recruitment and Assessment Team.

3.8.13 Children who have Family Members in Prison

The School is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.



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The School recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The School will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The School will work with the family, specialist organisations and the child to minimise the risk of the child not achieving their full potential.

3.8.14 Safeguarding in a Boarding Environment

Keeping Children Safe in Education and National Minimum Standards for Boarding 8.4 set out that boarding schools have additional factors to consider with regard to safeguarding, including the school's stance on sexual relationships between pupils, its approach to potential child-on-child abuse in boarding and the risks associated with children sharing overnight accommodation and its approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school.

The school is committed to promoting the safety and wellbeing of all pupils and takes a clear stance on sexual relationships between children. Sexual activity between students under the age of 18, whether consensual or not, is regarded as a significant safeguarding matter. Each case will be assessed with professional judgment applied in line with UK law and statutory guidance. The Designated Safeguarding Lead (DSL) will be consulted, and appropriate action will be determined following a thorough review of the circumstances. All boarders must understand that boundaries, consent, and respectful relationships are essential to a safe community, and any concerns or incidents will be responded to sensitively and appropriately. The school provides regular education and guidance to ensure pupils are aware of their rights, responsibilities and the support available to them.

The school recognises the potential for child-on-child abuse, particularly within the unique context of a boarding environment where pupils share living and sleeping spaces. While the school's full approach to preventing and responding to child-on-child abuse is outlined in detail elsewhere in this policy, it is important to note the additional vigilance required in boarding settings. The close proximity and extended time spent together can increase certain risks, including those related to peer pressure, boundary-crossing and inappropriate behaviour during unsupervised times. Staff are trained to monitor boarding accommodation sensitively and effectively, promoting a culture of respect, personal space, and clear behavioural expectations. Any concerns will be taken seriously and managed promptly in line with safeguarding procedures.

The school is committed to protecting pupils from harmful online content, recognising the particular challenges posed in a boarding environment where students may have greater access to personal devices. All devices brought into school by boarders are subject to the school's Acceptable Use Policy and must be registered with the IT department. The school reserves the right to inspect devices where there is a safeguarding concern, including reviewing content that may have been downloaded prior to arrival. Additionally, pupils are educated about the risks of accessing harmful material through mobile data (3G, 4G, 5G), which can bypass the school's filtering and monitoring systems. Staff work closely with boarders to build awareness, encourage safe online behaviour, and respond promptly to any concerns that arise.



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4.0 PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

- 4.1 The School will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2024. This section should be read in conjunction with the School's Safer Recruitment Policy.
- 4.2 The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. A full list of Safer Recruitment trained staff is available from the HR department.

The following members of staff have undertaken Safer Recruitment Training:

Ms Vanessa Garratt – DSL

Mrs Laura Haddon – Assistant Head, Deputy Designated Safeguarding Lead.

Dr Daniel Koch – Acting Senior Deputy Head, Senior School

Mr Oliver Stokes – Senior Deputy Head, Prep School

4.3 Allegations that may meet the harms threshold (Part Four, Section One)

4.3.1

Any allegation of abuse made against teachers, (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children Safe in Education, 2024, Part Four, Section One, will be reported straight away to the Headmaster.

4.3.2

In cases where the Headmaster is the subject of an allegation, it will be reported to the *Chair of Governors*. The School will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2024.

4.3.3

The School will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a teacher, member of supply staff or other staff, volunteer or contractor and adhere to the *relevant procedures set out in 'Keeping Children Safe in Education', 2024*, Part Four and the School's HR Policies, and seek advice from their HR manager.

4.3.4

The Headmaster or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken. If a member of the



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boarding staff is suspended, they will have to vacate their lodgings and find accommodation away from the School.

4.3.5

Before contacting the LADO, the School should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

4.3.6

Where the School identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.

4.3.7

The School will consider:

- **Looking after the welfare of the child** - the Designated Safeguarding Lead (or Deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

4.3.8

The School will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the School and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

4.3.9

Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

4.4 Concerns that do not meet the harms threshold (KCSIE 2024 Part Four, Section Two)

4.4.1 Low level concerns that do not meet the harms threshold should be reported to the Headmaster: NB: The term low level does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harms test.

4.4.2 In cases where the Headmaster is the subject of an allegation, it will be reported to the Chair of Governors. The School will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2024.

4.4.3 The School will deal with any such concern, no matter how small, where an adult working in or on behalf of the School may have acted in a way that:



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- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and



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- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

4.4.4 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.

4.4.5 Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The Headmaster and DSL will retain all records of low-level concerns in a central and secure low-level concerns spread sheet. These records are kept confidential, with access afforded only to a limited number of individuals.

4.4.6 The School will 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. This will enable 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.

4.4.7 The School should ensure that **all** staff, including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff, including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (both online and offline) with all children, especially those with a disability or who are vulnerable. Staff are encouraged 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.

4.4.8 All staff have signed to confirm that they have read the 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).

4.4.9 The School will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

5.0 OTHER RELATED POLICIES AND PROCEDURES

5.1 Use of Mobile Phones and other Smart Devices Policy

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- 5.1.1 This is a requirement for all Nursery or primary Schools with EYFS but any School may wish to adopt the policy. Mobile phones may not be used in EYFS, except in the case of an emergency. Photographs taken of the children should be part of planned activities and should be taken with School cameras/iPad. If a personal mobile phone is to be used during planned activities, this must be reviewed with the DSL and a 'photograph agreement' contract signed by the colleague to state that pictures will be taken, uploaded onto school IT and then deleted on the mobile phone. If any parents have not given permission for their children's photos to be published, staff must respect this decision and ensure they do not place such photos on the School website or any other publication without first contacting the parents. In such circumstances, the School's PR and Communications Team, who holds the permission details, must be contacted.
- 5.1.2 Our policy on use of mobile phones and other smart devices, cameras and sharing of images is set out in a separate document and is reviewed annually. It is recognised that personal mobile phones have the potential to be used inappropriately and therefore the School has developed a policy to outline the required protocol for all staff, students, volunteers and parents/carers.

6.0 GOVERNING BODY SAFEGUARDING RESPONSIBILITIES

- 6.1 Governing bodies must ensure they facilitate a whole School approach to safeguarding. 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.
- 6.2 The Governing Body fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in School are effective and comply with the law and government guidance at all times.
- It will:
- Nominate a Governor for safeguarding who will take leadership responsibility for the School's safeguarding arrangements and practice and champion safeguarding issues.
 - Ensure that all Governors and trustees receive appropriate Governor safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole School approach to safeguarding. This training will be regularly updated.
 - Ensure Governors and trustees are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
 - Ensure an annual safeguarding report (Annual Safeguarding Monitoring Report for Governors) is made to the full Governing Body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
 - Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
 - Ensure that this Safeguarding and Child Protection policy is published on the School website.
 - Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed.



Safeguarding & Child Protection Policy

- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

6.3 Use of School premises for non-School activities

6.3.1

If the Governing Body provides extended School facilities or before or after School activities directly under the supervision or management of School staff, the School's arrangements for safeguarding as written in this policy shall apply.

6.3.2

Where services or activities are provided separately by another organisation or individual, either on or off School site, the Governing Body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the School on these matters where appropriate.

6.3.3

The Governing Body will use the guidance on 'Keeping children safe in out-of-School settings' (Sept 23) which details the safeguarding arrangements that Schools and colleges should expect these providers to have in place.

6.3.4

The Governing Body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

This Policy is considered a 'live' document and will be updated as statutory guidance is released and reviewed annually.

This policy links to our:

- Attendance Policy
- Anti-bullying policy
- Mental Health and Wellbeing Policy
- Behaviour & Discipline Policy (Senior School)
- Behaviour & Discipline Policy including Rewards (Preparatory School)
- Complaints policy
- Child on Child Abuse Policy
- Critical Incident plan
- Low Level Concern Policy
- Whistleblowing Policy
- Missing Child Policy (Prep School)
- Missing Child Policy (Senior School)
- Safer Recruitment Policy - Teachers and Support Staff
- Staff Code of Conduct
- Online Safety Policy
- Relationship and Sex Education Policy



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- Staff Discipline and Grievance Procedures
- Use of Mobile Phone and Other Smart Devices Policy
- Whistleblowing policy



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These policies can all be found on the Policy page of our website, click [here](#) to view.

List Of Appendices

Appendix 0:	Categories of Abuse
Appendix 1:	Useful contacts
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APPENDIX 0

Categories of abuse, neglect and exploitation

Abuse a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act 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. 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 - 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.

Neglect - 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.

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers 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
- Ensure access to appropriate medical care or treatment
- Provide suitable education



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Emotional Abuse - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability • overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone

Sexual Abuse – involves forcing or enticing a child or 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.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing non-contact activities involving:
- children in looking at, or in the production of, sexual images,
- children in watching sexual activities or encouraging children to behave in sexually inappropriate ways
- grooming a child in preparation for abuse (including via the internet).



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

Child Criminal Exploitation - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. 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.

APPENDIX I

Useful Contacts - Cambridgeshire

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding MultiAgency Procedures

Education Safeguarding Team	ecps.general@cambridgeshire.gov.uk
Education Safeguarding Manager – Sara Rogers	sara.rogers@cambridgeshire.gov.uk
Early Help Hub (EHH) - Targeted Support Service	Tel: 01480 376666
Customer Service Centre – social care referrals	Tel: 0345 045 5203
Emergency Duty Team (out of hours)	Tel: 01733 234724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	lado@cambridgeshire.gov.uk
	Tel: 01223 727967
Senior Leadership Adviser – Phil Nash	Tel: 07920 270820
Prevent Officers	prevent@cambs.police.uk
	Tel: 01480 422277

Along with Cambridgeshire Local Safeguarding Children Partnership board we also may need to contact neighbouring partnerships– who provide advice or information:

- Northamptonshire: 0300 126 1000 or 01604 626938 (if outside normal office hours)



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- Bedfordshire: 0300 300 8585
- Buckinghamshire: 0845 4600001
- Leicestershire: 0116 305 5500

Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for Schools and colleges” (September 2024)

“Keeping children safe during community activities, after-School clubs and tuition: non-statutory guidance for providers running out-of-School settings” (April 2022)

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (May 2024)

“Meeting digital and technology standards in Schools and colleges, Filtering and monitoring standards for Schools and colleges” (March 2023)

“The Prevent Duty: an introduction for those with safeguarding responsibilities – GOV.UK (www.gov.uk) (Jun2023)

Prevent Duty Guidance: for England and Wales (March 2024)

“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, March 2024)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015)

“When to Call the Police: guidance for Schools and colleges,” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (December 2023)



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APPENDIX 2

Designated Safeguarding Leads

The Designated Safeguarding Lead in the Prep and Senior School will be a senior member of staff on the School's Leadership Team. The DSLs will take lead responsibility for safeguarding and child protection (including online safety). Broad areas of responsibility are:

Managing Referrals

- Refer (either alone or with the Headmaster/Governor with Responsibility for Safeguarding) all cases of suspected abuse to Children's Social Care and the LADO (if the case concerns a staff member) within 24 hours. In addition, the following will be contacted:
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child);
 - and/or Police (cases where a crime may have been committed).
- To liaise with the 3 safeguarding partners. The Local Authority, Clinical Commissions Group, Police and any other agencies as appropriate.
- The DSL will liaise with the Headmaster to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding. Be aware of contextual safeguarding.
- Attend any arranged Child Protection Action Plan meeting, if requested.
- Ensuring a support plan is in place for vulnerable pupils (as stated in the *Counter Terrorism and Security Act 2015*).
- DSL at the Senior School and Prep School will transfer pupils' CP files to new School, within 5 days of joining.
- Once the Registrar has confirmed that there are CP files for new students and requested that they are sent to the DSL, the DSL will store and liaise with any relevant agencies, Schools and members of staff.
- Due to the large and broad range of staff on the team, a DSL or DSP is always available during School hours to discuss any safeguarding concerns. However, in exceptional circumstances, staff should contact a member of the Senior Leadership Team and take advice from Social Care.
- Have access to and share with DSP teams useful contacts including:
 - Police Child Abuse Investigation Unit 101
 - Early Help Hub** 01480 376666
 - Customer Service Centre** 0345 045 5203
 - Emergency Duty Team** 01733 234724
 - LADO** 01223 727967 LADO@cambridgeshire.gov.uk



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Northamptonshire: 0300 126 1000 or 01604 626938 (if outside normal office hours)

Bedfordshire: 0300 300 8585

Buckinghamshire: 0845 4600001

Leicestershire: 0116 305 5500

Training

The Designated Safeguarding Lead should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments.
- Have a working knowledge of how local authorities conduct 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.
- Ensure each member of staff and volunteers have access to and understand the School's *Child Protection Policy* and procedures, especially new and part-time staff. Ensure staff are aware that they may be made aware of information on a need-to-know basis. Staff should be aware of the policy and where to find it. Staff also need to be aware that their initial response is very important. ○ Be alert to the specific needs of children in need, those with special educational needs, and young carers with contextual safeguarding
- Be able to keep detailed, accurate, secure written records of concerns and referrals handled in line with the GDPR 2018 principles. GDPR does not prevent School staff from sharing information with relevant agencies, where that information may help to protect a child. Records will be kept for seven years after pupils have left and then, after discussion with the Headmaster, may be shredded by the DSL as per Cambridgeshire and Peterborough Inter-Agency guidance.
- Record what discussions have taken place with parents on the Log of Concern about a Child's Welfare or, if a decision has been made not to discuss it with parents, record the reasons why.
- Make parents aware that such records exist, except where to do so would place the child at risk of harm. The aim is to gain consent to share information. However, be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if we believe there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. There should be a clear record of all decisions and communication.
- Obtain access to resources and attend any relevant or refresher training courses. ○ Encourage a culture amongst all staff of listening to children and taking account of their wishes and feelings when deciding upon measures the



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School may put in place to protect them. This includes any children with SEN or disabilities.

- One member of the Safeguarding Team will be trained in Prevent awareness and will complete the Prevent Risk Assessment with the Online Safety Lead.
- Maintain CP files on CPOMS and audit termly.
- Be trained and utilise Liquid Logic for EHA.
- Record when decisions are made to share or withhold information, what information has been shared with whom and why.
- Ensure that staff are aware that if they receive a Subject Access Request from a pupil, they will refer the request to the DSL or Headmaster.
- Use the National Police guidance “when to call the police”.

Raising Awareness

The **Designated Safeguarding Lead** should ensure the School’s policies are known and used appropriately:

- Ensure the School’s *Safeguarding Policy* is reviewed annually, and the procedures and implementation are updated and reviewed regularly. Work with Governing body or proprietors regarding this.
- Ensure the Safeguarding 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 local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the School, ensure their child protection file is copied for any new School as soon as possible, but transferred separately from the main pupil file. The DSL will obtain a confirmation of receipt.
- Raise awareness of updates in the Prevent Duty, Missing Child Protocol and the Reporting duty for FGM.
- Ensure staff are trained in online safety.
- Meet termly with the Safeguarding Team to discuss safeguarding arrangements.
- Promote educational outcomes by sharing information about the welfare, safeguarding and CP issues that children are experiencing with teachers, School and the Leadership Team, especially those that have a social worker. ○ Be aware and monitor students who may not make the threshold for a referral but are still a concern. To be aware and monitor patterns.
- Manage relationships between School, Early Help, Social Services and Police. ○ Know of links for support (which can be found in KCSiE 2024 and with the LA).
- Be aware that false and malicious claims can be made and how to address them.



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The Safeguarding Team Member (Designated Safeguarding Persons) role is:

- To be able to access/review all CP files via CPOMS, updating themselves on cases.
- To be on the rota for availability for trips or activities outside of term time.
- To help with training of new staff.
- To attend termly meetings to discuss safeguarding arrangements and audit case files and to help look for patterns.
- To be able to take the lead in specific cases

APPENDIX 3

Nominated Safeguarding/Prevent Governor

Terms of Reference

The Nominated Safeguarding Governors for Kimbolton School ("the School") are Simon Page and Tracey Reid. However, the Board of Governors shall retain overall responsibility for Safeguarding, including Prevent. The Board of Governors shall determine and review annually the terms of reference for the nominated Safeguarding Governor.

Terms of Reference

1. The main role and duties of the Nominated Safeguarding Governor on behalf of the Board of Governors is to ensure that the School has in place a suitable Child Protection and Safeguarding policy, including EYFS, together with all other associated and related policies, including a Prevent Risk Assessment and to ensure that all such policies and associated procedures have proper regard to prevailing regulations, guidance, standards and advice.
2. To meet regularly, at least once a term, with the School's Designated Safeguarding Leads in order to monitor the effectiveness of the Policies mentioned in paragraph 1 above and to monitor the implementation of any associated procedures across the School.
3. To ensure that the School's Designated Safeguarding Leads are part of their respective School's leadership team and have sufficient time and resources at their disposal to carry out their duties effectively.
4. To ensure that a Designated Safeguarding Lead is identified for both the Senior School and the Prep School.



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5. To ensure that the Designated Safeguarding Leads and the team receive appropriate training at least every two years.
6. To ensure that any deficiencies in the School's safeguarding practices that are brought to the attention of the Board of Governors, are investigated and addressed as soon as practicable.
7. To respond and report any abuse allegations or concerns raised about the Headmaster.
8. To review the School's Single Central Register on at least a termly basis. At least one review per year must be on an unannounced basis in liaison with the School's HR Officer.
9. To ensure that safer recruitment practices are in place and implemented with appropriate checks undertaken on all new staff and volunteers.
10. To ensure that arrangements are in place for all staff to receive the appropriate training with regard to Safeguarding and Child Protection, and that the necessary procedures are in place to ensure that such training is up-to-date.
11. To undertake any appropriate training in accordance with the Local Safeguarding Children's Board's recommendations to fulfil the role.
12. To provide an annual report to the Board of Governors on Safeguarding Practices within the School that enables the Board to monitor compliance against prevailing regulations, guidance, standards and advice.



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APPENDIX 4

Supporting Staff

Supervision at Kimbolton School

As a key pastoral and/or safeguarding leader, you are there as pupils navigate their lives; juggling School, home, jobs, anxieties, relationships, and expectations to name a few. When you combine these pressures with big changes which they may be going through, either physically, intellectually, emotionally and/or socially, there's no doubt that you are a vital support to pupils throughout the academic year.

Being ever-present with pupils in crisis takes skill and energy – and can take a huge toll if you're not supported properly. From safeguarding to suicide, anxiety, home life, relationships, self-harm, you listen to your pupils and are present with their thoughts and experiences. You do this with care, empathy, commitment, and professionalism.

However, this level of support also means we run the risk of sitting with this encounter long after it has ended. There can be an aftermath of wrangling and worrying, exhausting ourselves by thinking: *Is the pupil ok? Did I say the right thing? Did I do the right thing? Did I listen enough?* These critical reflections often happen when we are alone and outside of the workplace.

Some of these encounters are procedurally taken out of our hands under referral systems or signposting, but the memory of the work is still there, and we are expected to carry on and continue to repeat this level of support and its related aftermath each time we work with a pupil who needs us.

Given these demands on School staff, it's helpful to look to similar lines of work to see how professionals are supported when exposed to similar encounters. If we look at the counselling profession, their role of '**supervision**' could provide an answer to emotionally and professionally supporting those who support our pupils. It's about casework supervision, not managerial supervision. It is a space for pastoral workers to discuss the support they have undertaken with pupils, particularly after emotionally challenging communication, or when a pupil divulges distressing information. This supervision allows pastoral workers to have a consultation with a more experienced person to discuss elements of the provision, and to offload in a safe and non-judgemental space.

Staff might talk through ethical dilemmas, seek reassurance, check in with an experienced colleague to develop practice, or find a safe space to decompress after a tough encounter. Support in all these areas help pastoral workers to maintain balance in their work and to be able to continue to support pupils in the invaluable way they do.

What could "**supervision**" at Kimbolton

School look like? It could be;

- For individuals or groups with a situation in common.
- A one-off or a regular session e.g. every half term.



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- To talk about a work situation or a particular pupil.
- Confidential, unless risk of serious harm to yourself or someone else.
- An opportunity to offload, especially if you deal with a lot of pastoral issues.
- A chance to explore how you could work with a particular situation.
- A chance to explore what you might do differently another time.

Sometimes work and personal life merge, and your supervisor would be able to help you explore if counselling may help the personal side or whether supervision is the best way forward.

As a starting point we would like to **encourage/suggest that key pastoral and/or safeguarding leaders have one session of supervision a term, i.e. three a year.** If you feel that a member of your team would benefit from this, please do encourage them to also book a session, although this may be a little more sporadic. This is to be booked via counsellors@kimbolton.cambs.sch.uk



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Annual Review

Date Reviewed:

- (i) September 2024 following updated statutory guidance, *Keeping Children Safe in Education* (Sept 2024)

Reviewed by:

Chair of Governors

Supervisory Safeguarding Governor

Headmaster

Designated Safeguarding Lead