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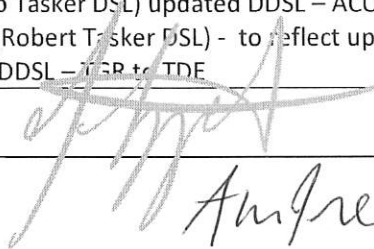
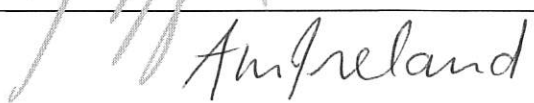
EF ACADEMY – TORBAY

Safeguarding Policy



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Document title:	Safeguarding Policy (formerly Child Protection Policy)
Date Created:	March 2011
Author:	Head Teacher
Individuals Involved in Developing the Document:	Executive Committee (Governing Body) Designated Safeguarding Lead
Document Purpose:	Defines the school's approach to child protection and how it fulfils its legal and regulatory safeguarding responsibilities.
Related Documents:	Working Together to Safeguard Children July 2019 Keeping Children Safe in Education September 2020 Multi-agency statutory guidance on FGM October 2018 The prevent duty: for schools and childcare providers June 2015 Peer-on-Peer Abuse Policy Alcohol, Smoking and Substance Abuse Policy Anti-Bullying Policy Complaints Policy Crisis Management Policy Independent Listener Policy and Procedures First Aid Policy Missing Persons Policy Rewards Behaviour and Sanctions Policy Searching and Confiscation Policy Whistleblowing Policy E-Safety policy Children Missing Education Policy COVID-19 Policy (includes cover for DSL) Online School/Learning Guide (Sept 2020)
Date of Next Review:	September 2021
Recent Updates:	September 2018 (Robert Tasker DSL) – updates to reflect staff changes and changes to KCSiE Sept 2018 and WTTSC July 2018 October 2018 (Robert Tasker DSL) – to reflect Multi-agency statutory guidance on FGM September 2019 (Robert Tasker DSL) - to reflect updates to KCSiE 2019 (Upskirting and Serious Violence) October 2019 – (Robert Tasker DSL) updates to reflect new Torbay Safeguarding Children Partnership and new relevant contacts January 2020 (Rob Tasker DSL) updated DDSL – ACO to TGR September 2020 (Robert Tasker DSL) - to reflect updates to KCSiE 2020 and update DDSL – TGR to TDE
Current version approved by Chair	Jens Appelkvist: 
Current version approved by Executive Committee Member with responsibility for Safeguarding	Anna Ireland: 



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Safeguarding Policy

Purpose and Aim of this Safeguarding Policy

EF Academy Torbay is a 14 to 19 boarding school and we are committed to safeguarding and to promoting the welfare of all of our students. Each student's welfare is of paramount importance. All staff and volunteers will endeavour to work together to encourage the development of an ethos of openness and challenge, which embraces difference and diversity and respects the rights of all members of the community.

This Policy is reviewed at least annually by the Executive Committee, Head Teacher who is Designated Safeguarding Lead (DSL) and the Senior Leadership Team, and more frequently if legislation or guidance requires.

This policy applies to all adults, including volunteers, working in or on behalf of the school, who are required to read it and sign a declaration that they understand their responsibilities under this policy.

The purpose of this policy is to protect children at EF Academy Torbay and to provide our staff with the overarching principles that guide our approach to safeguarding. EF Academy Torbay believes that a child should never experience abuse of any kind and that all children have a right to a safe environment in which to live and study. At the school, we all have a responsibility to promote the welfare of all children and to keep all of them safe. We are committed to practice in a way that protects them.

If you have a concern about a child, contact one or more of the following people or agencies. If a child is in danger or at risk of immediate harm dial 999 and ask for the Police.

School Contacts		
Name	Role	Contact Details
Robert Tasker	Designated Safeguarding Lead – Head of School	+44 (0)7976 860826 EF Academy emergency phone (out of office): 07834 753135) rob.tasker@ef.com Located on the 2 nd floor of the Tower Building
Kelly Hall	Deputy Designated Safeguarding Lead – Head of Boarding	07852576891 EF Academy emergency phone (out of office): 07852576891 kelly.hall@ef.com Located on 2 nd floor of Tower Building/Torre Residence



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Tina Desmond	Deputy Designated Safeguarding Lead – Deputy Head of Boarding	07723368351 EF Academy emergency phone (out of office): 07834 753135) tina.desmond@ef.com Located on 2 nd floor of the Tower Building
Anna Ireland	Executive Committee Member with responsibility for Safeguarding	01803 202 915 07917 712317 anna.ireland@ef.com Located on 1st floor of the Castle Building
External Contacts		
Torbay Safeguarding Children Partnership (TSCP)	01803 208 100 (ask to be put through to the Safeguarding Hub) Outside of office hours you can call the Emergency Duty Service on: 0300 456 4876 Hearing Impaired SMS: 07810 548 004 tscp@torbay.gov.uk	
The Local Authority Designated Officer (LADO)	Ivan Sullivan 01803 208541 cpunit@torbay.gov.uk	
The Emergency Services	999	

Definition of Child and EF Academy's role in Safeguarding

As in the Children Acts 1989 and 2004, a child is any individual who has not yet achieved his/her 18th birthday.

“Education staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse or neglect at an early stage” (Working Together to Safeguard Children 2019)

Links to Relevant Law and Guidance

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Our statutory duty under section 175 of the Education Act 2002 to ensure that arrangements are in place for safeguarding and promoting the welfare of children.
- Our duties under the Children Acts 1989 and 2004 which enshrine the welfare of children as paramount, the United Nations Convention of the Rights of the Child, 1991, the Sexual Offences Act 2003, the Protection of Freedoms Act 2012 and the relevant government guidance on safeguarding children, such as Working Together to Safeguard Children 2019, to work together with other organisations and partners in order to achieve this.



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- Our commitment under Keeping Children Safe in Education 2020 and updates to the guidance contained therein for all staff to make safeguarding and promoting the welfare of children is **everyone's priority**. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. Children includes everyone under the age of 18. (KCSIE, 2020). All of our staff read at least part 1 (and those working directly with children Annex A) of KCSIE Sept 2020 (and updates as issued) and sign to say they have read it.
- Our Common Law duty to protect and keep children safe whilst in our care and should consider at all times what is in the best interests of the child.

Furthermore, we fully acknowledge our responsibilities for child protection and recognise that through our day to day contact with children, school staff are well placed to identify signs of risk and harm.

- We recognise that our particular setting as a predominantly international, fully boarding school requires us to ensure safeguarding is understood and implemented at all levels.
- We recognise that for children high self-esteem, confidence, risk awareness and good lines of communication help to reduce risks.
- We recognise that for some children school may be the only stable, secure and consistent environment in their lives.
- We will make all parents/carers aware of the role and responsibilities of the school with regard to safeguarding and promoting welfare and of the existence of this and other related policies (listed later) through our school website and parent handbook
- We make all students aware of how we safeguard them through induction at the school and at the residences, in host families, the student and residence handbooks, assemblies, tutorial time and PHSE.
- This policy should be read in connection with other safeguarding related school policies and procedures:
 - Rewards, Sanctions and Behaviour Policy
 - Recruitment Policy
 - SEND Policy and Procedure
 - E-Safety Policy,
 - Anti-bullying Policy,
 - PSHE Policy
 - Whistleblowing Policy
 - Staff Code of Conduct
 - Attendance Policy
 - Equality Policy
 - Complaints Policy
 - Missing Persons Policy



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- Children Missing Education Policy and Safeguarding Responses (CME)
- Response to Peer-on-Peer Abuse Policy

Objectives and Scope of Policy

To provide a safe, secure, inclusive and consistent environment for all children regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, racial heritage, religion/belief, disability, sex (gender), sexual orientation, sexual identity, ethnic background, religious faith, appearance, issues in the family, ethnic or national origin or because of cultural background, linguistic background, special educational needs, or academic or sporting ability. We also recognise that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Our goal is to provide an environment in which all students feel safe, supported, valued, respected and listened to by working in partnership with children and their parents, and other agencies.

We will seek to keep children safe by:

- Emphasising that safeguarding and promoting the welfare of children is **everyone's** responsibility.
- Putting in place mechanisms to assist staff and volunteers to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE Sept 2020 and ensure that all staff read and understand at least part 1 of KCSIE Sept 2020. Staff will receive annual in person safeguarding training and regular updates as required.
- Establishing an environment in which children are and feel safe and can learn, develop, feel valued and respected and have a voice.
- Adopting child protection and safeguarding practices through the procedures outlined in this policy and related policies and our code of conduct for all our staff.
- Adopting safe recruitment practices to check the suitability of staff, volunteers and visitors to the school. We will also ensure that procedures are in place to prevent the unsupervised access to children of adults who have not undergone such a checking process.
- Having measures in place to facilitate and promote the safe use of technology (in line with the local authority guidance on e-safeguarding) and developing and implementing an effective E-Safety provision through outside providers that supports our acceptable use policy and related procedures.



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- Ensure staff are aware of what to do and who to inform should they become aware of a sexting incident.
- Raising the awareness of children and equipping them with the skills and knowledge needed to keep safe.
- Ensuring that children develop the ability to protect themselves and others from radicalisation and violent extremism through the promotion of British values.
- Having in place procedures for the identification and reporting of cases where harm or risk of harm to a child is suspected and ensuring that all staff are aware of such procedures.
- Having in place systems and processes for the identification and reporting of mental health problems and understand this could be a sign or indicator of abuse, neglect or exploitation. This will include routes to escalate concerns and clear referral and accountability systems.
- Supporting children who have suffered abuse or neglect or who are otherwise vulnerable (e.g. children living away from home), where appropriate, in accordance with their agreed child protection/care plan.
- Monitoring and reviewing our safeguarding and child protection practices, procedures and internal training materials as required but at least annually.
- Ensuring that the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback.
- Sharing information about child protection and good practice with children, parents, staff and volunteers.
- Sharing concerns with agencies who need to know and involving parents and children appropriately.
- Ensuring clear reporting procedures for allegations or suspicions of abuse, in summary:

Allegations against staff and volunteers are reported to the Head Teacher , (the Head Teacher will then contact the LADO). If the report is made to the DDSL about a member of staff or volunteer, the DDSL informs the Head Teacher. Allegations or suspicions of abuse against the DDSL are reported to the Head



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Teacher. Allegations or suspicions of abuse against the Head Teacher are reported to the proprietor/s and Executive Committee Member responsible for Safeguarding without informing the Head Teacher, the proprietor or Executive Committee Member responsible for Safeguarding will contact the LADO, again without informing the Head Teacher .

Where a person is dismissed or removed or would have been had they not left of their own choosing, the Disclosure and Barring Service will be informed. Matters of professional misconduct will be referred to the Teaching Regulation Agency (TRA).

Working with other agencies

The school, through the DSL maintains positive working relationships with a number of external agencies to support the implementation of our safeguarding policy. These agencies include:

- Torbay Safeguarding Children Partnership
- The local Police Intervention team
- Checkpoint, Torquay (The Children's Society)
- Local GP's and the NHS

Roles and responsibilities

We recognise that all staff, regardless of their role have a duty to safeguard children and promote their welfare. Our policy applies to the whole school community: all teaching and non-teaching staff whether based at the school or in the residences, executive committee members, volunteers and visitors working in the school.

The Executive Committee is responsible for:

- Effective discharge of responsibilities to include the annual review of safeguarding and child protection arrangements throughout the school.
- Nominating an Executive Committee member to take leadership responsibility in safeguarding and to ensure there are appropriate policies and procedures to include online safety and approach to sexting in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.



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The Senior Leadership Team (SLT) is responsible for:

- Ensuring the school has a child protection policy and procedures in place that are in agreement with national and local authority guidance and inter-agency procedures, and the policy is made available in a range of formats, including being available on the school website.
- Ensuring the school maintains a safer recruitment protocol and ensures that all necessary checks are applied to all staff and volunteers who work with children.
- Ensuring the school has procedures in place for addressing allegations of abuse against staff and volunteers that are in accordance with guidance from the local authority and local inter-agency procedures.
- Establishing an environment in which children are and feel safe and can learn, develop and have a voice.
- Providing a Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and pastoral leaders who are all known to parents/carers, staff and students.
- Ensuring quality teachers who know the children in our care really well and cater for their individual needs.
- Providing senior peers as buddies, especially during induction.
- Having an active and effective student council.
- Ensuring that our buildings and site are secure and visitors to the school are properly checked and supervised.
- Ensuring that we have up-to-date policies in place for health and safety, PSHE (including Relationships and Sex Education (RSE)), Rewards, Behaviour and Sanctions (including Bullying, Racist and other discriminatory incidents and use of reasonable force), Attendance, Equality, Anti-Bullying including internet/mobile, Whistle blowing, Acceptable Use in relation to the use of technology (including mobile phones and photographic equipment).
- Ensuring that these policies and procedures are fully understood and adhered to by all staff.
- Ensuring that all staff are risk aware and carry out risk assessments as appropriate to their individual role and responsibilities.
- Ensuring that all staff, Executive Committee members and regular visitors and volunteers have been made aware of the Keeping Children Safe in Education, September 2020, Part 1 (and for those working directly with children Annex A). There are copies of the document on the school intranet and in the staff



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work-room. There is also a school specific Code of Conduct for Safe Working Practice within the staff handbook.

- Ensuring staff and volunteers receive online or in-person training on at least an annual basis to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE 2020. Ensure all staff sign a declaration to say they have read this document.
- Following the Torbay Safeguarding Children Partnership (TSCP) procedures Managing allegations and concerns regarding staff, carers and volunteers working with children and young people 2011 for dealing with allegations and concerns about staff (paid or unpaid, temporary or permanent). Where such an allegation or concern arises, the Head Teacher should be notified. The Head Teacher will ensure the Local Authority Designated Officer (LADO) is notified within one working day. Where such an allegation is made against the Head Teacher, the matter will be referred to the chair of the Executive Committee who will likewise notify the LADO within one working day.

* PLYMOUTH AND TORBAY SAFEGUARDING CHILDREN PARTNERSHIP (TSCP) - Formerly Torbay Safeguarding Children's Board – (TSCB)

The Head Teacher should ensure that:

- child protection/safeguarding policies and procedures approved by the EF Academy Torbay School Executive Committee are fully implemented, and adhered to by all staff
- staff undertake regular and appropriate training in child protection procedures
- any flaws or weaknesses regarding child protection procedures are addressed as a matter of urgency and without delay
- policies and procedures are extensively reviewed annually by the Head Teacher, DSL and SLT
- all staff can access the school's child protection/safeguarding policy
- adequate resources and time are apportioned to enable the school's staff member with responsibility for child protection, currently the DSL, to carry out their responsibilities
- all staff and volunteers are given opportunity to raise concerns about weak or dangerous practice in regard to children's welfare, and such concerns are met with consideration and sensitivity.

The DSL (also the Head Teacher) should ensure that:

- all staff members know who the DSL and Deputy DSLs are, and achieves this by (a) producing information that is posted at school premises and (b) meets with all newly appointed staff within the first 5 days of their employment.
- all staff understand their safeguarding responsibilities and can recognise how to identify possible signs of abuse, neglect or mental health problems and how to report them;



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- all cases of suspected abuse or neglect are referred to the local authority children's social care and:
 - the designated officer(s) for child protection concerns (all cases which concern a staff member),
 - 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).
- all new staff take part in induction training and ongoing training that includes safeguarding and safe working practices training to keep them aware of updates to the school's reporting procedures, relevant personnel and changes to legislation, etc.;
- the DSL understands how (TSCP) operate and be able to attend and contribute to these;
- the DSL's training is in accordance with local agreed procedures (Level-3, refreshed at least every two years). The DSL keeps up-to-date with legislation, obtains access to resources and attends any additional relevant training courses that the DSL, safeguarding Executive Committee member or Head Teacher identifies as ensuring the school's safeguarding and child protection provision;
- all staff are aware that the DSL is the school's safeguarding expert and should be the first point of contact for advice, guidance and support on all child protection matters;
- Ensure that appropriate safeguarding materials and guidance for students and staff are displayed, made available electronically and in hard copy where appropriate and are used to raise awareness of child protection practice.

All staff and volunteers:

- maintain at all times an 'it could happen here' attitude
- support the development of a "safeguarding culture" within the school
- are fully conversant with the school's policies and procedures to ensure that the safety of all students is a priority
- attend appropriate training
- identify students who may be at risk
- **understand Children with SEND are more vulnerable to various types of abuse**
- inform the designated safeguarding lead of any concerns immediately
- all staff and host families are trained to recognise that staff in school are uniquely well-placed to observe any physical, emotional or behavioural signs which signify that a student may be suffering harm
- the relationships between all school staff, house-parents, host families and students is one which breeds respect, confidence and trust and therefore enables children to feel able to make disclosures of abuse, and/or enables staff to discovering evidence of abuse.



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- understand that mental health problems can be a sign or indicator of abuse, neglect or exploitation

Mental Health Problems, Identification and Referral

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering from, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, and to take appropriate action depending on the nature of the concern. If this concern is also a safeguarding concern, immediate action should be taken following the procedures in this policy.

As of 2020, all EF Academy Torbay staff undergo annual mental health training provided by Checkpoint who provide the School's counselling service. The school provides counselling for students who require it and all staff are trained annually on the referral procedure within the school for reporting mental health concerns. Additionally, the Head Teacher, specific pastoral staff, Heads of Boarding and House Parents have been trained in mental health first aid. These staff members are available to support other colleagues, students and parents around mental health concerns for EF Academy Torbay students.

Safer Recruitment and Selection

The school pays full regard to the statutory guidance "Working Together to Safeguard Children 2019" and all of the relevant updates to this and other safeguarding guidance, up to and including KCSIE Sept 2020.

We ensure that all appropriate measures are applied in relation to everyone who works in the school including volunteers, staff employed by our contractors (e.g. airport transfer drivers and catering staff at school and the residences that come into contact with our students).

The school's safer recruitment practice includes an advertising campaign that makes clear that safeguarding is a priority at our school, a job description that makes clear when a role involves working with children, a rigorous shortlisting procedure by panel, interviews with probing safeguarding questions



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with at least one person on the panel (all if possible) who has had safe recruitment training, checking the backgrounds of appointees, verifying identity and academic or vocational qualifications, obtaining professional references, checking prior employment history and establishing that a candidate has the necessary health and physical capacity for employment.

Our Safer Recruitment practice also includes undertaking interviews and, where appropriate, Disclosure and Barring Service checks. We recognise our responsibilities under the Vetting and Barring Scheme and understand our legal responsibility to refer to the agency any cases which fall within the referral guidance.

The Head Teacher, or their nominated representative, ensures they have seen evidence of appropriate child protection checks and procedures for non – EFIA staff who work with our students at other sites (e.g.: sports centres, residential trips, etc.)

In order to ensure child safety, the following checks are carried out in accordance with government requirements:

- a DBS Enhanced Disclosure is obtained for all staff in accordance with statutory guidance, including additional Section 128 checks for staff with management or leadership responsibility
- All teachers will be subject to an additional check to ensure that they have not been prohibited from teaching or that they are subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current
- a DBS Enhanced Disclosure for any staff following a significant break in service
- a single central record (SCR) is maintained by the Administrative Officer, detailing the range of checks carried out on staff. The integrity and accuracy of the SCR is regularly checked by the Head Teacher and on occasion by the Executive Committee member responsible for safeguarding.
- all new appointments to the school workforce who have lived outside the UK are subject to additional checks as appropriate.

Please also refer to the Safer Recruitment Policy for more detailed guidance.

E-Safety

Children are taught how to keep themselves safe when accessing the internet and being online. The school's E-Safety Policy also clearly sets out the School's procedures for mobile technology which includes the management of access to 3G/4G/5G. For more detailed guidance please refer to the E-Safety Policy.

Remote Learning



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The school's E-Safety Policy clearly sets out the School's procedures for keeping children safe when undertaking part in EF Academy's "online School". Children are taught how to keep themselves safe when accessing remote learning and being online. For more detailed guidance please refer to the E-Safety Policy.

Outside speakers

The school will vet all outside speakers by taking references or recommendations. The content to be delivered will also be vetted by reviewing any presentation material or handouts before each session. The speakers will always be accompanied by a member of School staff whilst on school property. They will be expected to read the School's safeguarding for visitors document when signing in and will be given a full brief of the diverse School community, its ethos and its aims.

Safe Professional Practice

Through induction, peer mentoring and ongoing Safeguarding and Safe Working Practice training and materials, the school ensures that staff:

- are fully conversant with this safeguarding policy and related policies;
- take responsibility for their own actions and behaviour and know to avoid any behaviour which would lead to the questioning of their motivation and intentions;
- carry out their duties in an open, transparent and professional manner and **maintain an ethos of openness and challenge**;
- discuss or solicit advice from the DLS and/or school leadership team over any issue which is causing them concern or anxiety with regards to a child or the behaviour/attitude of an adult responsible for their care;
- record and report any incidents or disclosures made;
- are aware that ignoring the law or other professional guidelines could result in criminal or disciplinary proceedings.

The Head Teacher will provide for a report to be sent promptly to the Disclosures and Barring Service (DBS) if the school dispenses with a person's services because of unsuitability to work with children or would have done so had the person not resigned. Consideration is given to making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional



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conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence.'

Identification and reporting of cases where harm or risk of harm to a child is suspected

All staff are responsible for reporting any concerns about the welfare of a child to the Designated Safeguarding Lead. These concerns will then be followed up and dealt with appropriately by the DSL, who will ensure these confidential records are kept securely.

It is the responsibility of the Designated Safeguarding Lead (DSL) to have discussions with TSCP Multi Agency Safeguarding Hub (MASH) and/or the police when concerns arise regarding the safety of a student in this school. All such students are closely monitored, including attendance, and where extra concerns arise these are passed on to the appropriate agencies.

Advice and support are offered to other members of staff dealing with a student for whom there are concerns.

Through training, all staff (teaching and non-teaching) will be made aware of all their responsibilities concerning safeguarding and child protection. They will be able to recognise the signs of abuse and understand their responsibilities to report when a child may be at risk of harm. Basic training of all staff will be updated **yearly**. Pastoral Leaders are required to be trained at TSCP Foundation Level 3 (e.g. DSL, Deputy DSLs, Head of Boarding) will update to that level every **two** years. All members of staff engaged in regulated activity have regular face-to-face child protection and safeguarding training at least annually. Other key members of staff such as the SENDCO (Learning Diversity Coordinator) will have TSCP safeguarding Foundation Level 3 training at least every **three** years. Temporary and voluntary staff are made aware of the arrangements for training and reporting. SLT are also trained in Safe Recruitment. (Training is explained more fully below).

The Head Teacher and DSL will ensure that the school has a range of Early Help support available internally and works closely with TSCP, other external agencies and families to provide further Early Help support if required (Targeted Help). Additionally, the School will ensure it provides written referrals (on any required form) and recognises the importance of attendance at all meetings called when there is a concern regarding the safeguarding of a student. All children who are deemed 'children in need' or 'looked after children' will have their own file and a chronology sheet regularly updated. The Designated Safeguarding Lead or the students pastoral lead will attend all relevant meetings.

Procedure for reporting disclosures or suspicions of abuse or neglect

Anyone can raise a concern and parental consent is not required for referral to statutory agencies.



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- **Raise the concern with the schools designated safeguarding lead (DSL)**, or if the DSL is not available, the Deputy DSLs.
 - Will consider the option of Early Help, or Targeted Help with the intervention of external partner agencies.
 - Refer cases of a child in need to children's social care; a child at risk to children's social care or to the police if a crime is thought to have been committed. This will happen as soon as possible but no later than one working day.
- **Refer your concerns directly to local Children's Services** directly as well via the TSCP MASH mash@torbay.gov.uk (all further contact details at the end of this policy) or the Early Help Centre on 208525.
- **Where there is risk of immediate serious harm to a child** then a referral should be made to the police (999) immediately. If there is no immediate risk of harm, the 101 police number can be used or the referral can be made to the 'hub' as indicated above.
- **If the child's situation does not appear to be improving, after the DSL is made aware**, the staff member who raised the concern should press for re-consideration.

Whistleblowing Policy

Whistleblowing is exposing organisational misconduct, dishonesty, illegal or unethical activity. If an individual working for EF Academy Torbay has a genuine belief that managers or colleagues are not acting appropriately, including responding to allegations of abuse or harm, the individual is obliged to raise this at the most appropriate level. The school's whistleblowing process enables workers to do this safely and without reprisal within EF Academy Torbay wherever an individual may work.

Executive Committee - Designated Safeguarding Lead

Our school's designated safeguarding governor (Executive committee Member), will act as the link person between the governing body and the Designated Safeguarding Lead. This governor will review safeguarding procedures/practices including access to training through meetings with the Designated Safeguarding Lead and the SLT. The Head Teacher will ensure that sufficient time is given to carry out the duties including accessing training. Where safeguarding concerns arise regarding a member of staff, the safeguarding governor will liaise with the Governing Body.

Children with Statements of Special Educational Needs

EF Academy Torbay recognises that, statistically, children with behavioural difficulties, disabilities and specific learning difficulties and/or special educational needs are most vulnerable to abuse. All staff that support or care for these children are made aware of the extra need for vigilance for signs of abuse with regards to these children. (See also our SEND/LD Policy.)



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Supporting Vulnerable Children and Children in Need

A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The school recognises that some children are more vulnerable than others, for example those aged under 16, those for whom this is their first extended stay away from family and friends, children with mental health conditions or chronic medical conditions.

Pastoral leads support all students and play an important role in supporting, monitoring and reporting any concerns relating to vulnerable and in need children. Early help - where the school identifies that a child may be more vulnerable, a specific pastoral lead will be allocated to that child and required to undertake a full assessment of the needs of the child. This will be discussed in the weekly Student Case Study Group meetings. The DSL will oversee this process for the individual student. The role of the delegated staff in this process will include, but not be restricted to the following actions.

- The development of a support plan for the child using Torbay Children's Services Common Assessment Framework documentation.
- Frequent and regular contact with the child's parent(s), to ensure that the parent(s) are aware of the concerns and can contribute toward the support plan.
- Frequent and regular contact with the child's homestay family or house parent.
- Liaison with external agencies to provide support and intervention where necessary, these can include liaison with the child's GP, Torbay and Southern Devon Child and Adolescent Mental Health (CAMHS) Services and providers such as Check Point Torbay.

Where a child is identified as being vulnerable, the DSL will review the support plan for the child on a fortnightly basis. This will continue until such times as the school judges, with the parent(s) agreement, that the child is no longer at risk.

Parents

We are committed to working with parents/guardians positively, openly and honestly. We endeavour to make sure all parents/guardians are treated with respect, dignity and courtesy.

EF Academy Torbay will share with parents/guardians any concerns we may hold about their child unless to do so would put the child at risk.

We encourage parents to discuss any concerns they may have directly with the school's Designated Safeguarding Lead and/or with the Pathway Manager for their child.



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We make parents aware of our Safeguarding policy in the Parent and Student Handbooks and they are told they can view this policy online at <http://www.ef.edu/academy/campuses/torbay/>

The school shares the common purpose with parents/guardians of keeping children safe from harm and promoting their well-being.

Visitors to the school and to the residences

All non-school staff visitors (other than the post person and deliveries made to reception and visitors who come when there are no students present) **to the school and to the residences** will:

- be required to enter through the front door only;
- have their identification checked and be required to sign in and out in a book placed in the reception for this purpose;
- be issued with a visitors' badge which they must wear at all times they are on school/residence property and which has contact details for reporting suspected abuse or disclosures on the reverse side, which will be pointed out to them when it is issued;
- At our residences, all non-school staff visitors, including residents' family members, are requested not to use mobile phones in their possession that contain a camera/video function. Visitors are restricted to the reception area for use of their mobile phone.
- At the school and residences, when students are present, visitors will be escorted/supervised during their visit by a member of staff in regulated activity.

Curriculum and Learning (PSHE); Safeguarding-related Sessions for Students

The school is committed to ensuring that students can develop an understanding of which behaviours help to protect them from risk, or are unacceptable or place them at risk, and the steps they can take to ensure their personal safety and welfare, including on-line.

To support this we have a rigorous induction programme that encompasses safeguarding presentations from the Police, the school's pastoral leads, the Boarding Team, and Head of School.

Throughout the academic year we provide a comprehensive school-wide PSHE programme to all students (including those for whom it is not required by statute, such as over 16s) in which safeguarding is repeatedly foregrounded. Thus, students age 14 to 19 receive sessions on subjects such as the dangers of substance misuse and alcohol, how to manage their finances, staying safe online, the dangers of being groomed for CSE or radicalization, healthy relationships (within RSE) and healthy lifestyle choices (including anti-smoking).



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Three times per academic year, the school provides all first year students with an 'Enrichment Day' upon which safeguarding subjects are provided by incoming expert providers on issues such as E-Safety, anti-smoking, PREVENT.

School assemblies, by academic course, also address safeguarding topics with students and are updated to deal with currently occurring concerns that may arise during the year.

From their arrival at school, our students learn to whom they can talk to about their worries and concerns, both in and out of school and we value and promote their right to be listened to. We are improving our methods of listening to students through creating a student committee that will be concerned with safeguarding and boarding issues for the first time this year.

Please also refer to our PSHE policy and E-Safety Policy.

Photography and Filming by EF Academy Torbay

Using photographs of children for publication

EF Academy recognises that the use of photographs on websites and in other publications can pose direct and indirect risks to children and young people, and with regards to this we have put in place the following policy and procedure to address the safeguarding of our students:

- Risk of identifying whereabouts of child to groomers: even though the child's personal identity (full name, address) is kept confidential, we recognise that other details accompanying the photo can make them identifiable and therefore vulnerable to individuals looking to 'groom' children for abuse.
- Risk that photo itself may be used inappropriately by others. Photos can easily be copied and adapted, perhaps to create images of child abuse, which can then find their way on to other websites.
- Minimising these risks: we establish the type of images that appropriately represent the organisation and the activity, and we think carefully about any images showing children and young people on our website and in our publications and blogs.
 - We never supply the full name(s) of the child or children along with the image/s of any publications that are made public. e.g. for marketing purposes.
 - We only use images of children in suitable dress, recognizing that some activities our students are involved, such as swimming, gymnastics and athletics present a higher risk for potential misuse than others. Thus, our photos of these types of activities focus on the activity rather than a particular child and avoid showing the full face and body of a child. E.g. any



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photographs of children in the sea or a swimming pool would show them in the water or from the waist or shoulders up only.

When using photographers:

- our specialist marketing staff or teachers leading events provide a clear brief about what is considered appropriate in terms of content and behaviour.
- We issue the photographer with identification, which must be worn at all times they are in school or at our residences or host families' homes.
- We do not allow unsupervised access to children or one-to-one photo sessions at events; e.g. at graduation, our photographs of individual students in their gowns and their diplomas are not taken privately, but in full view.
- We do not allow photo sessions away from the event, for instance at a young person's home getting ready for an event.
- If parents or other spectators are intending to photograph or video at an organised event, we also make them aware of what is permitted and what is not.

Parental permission for use of child's photographs

In signing the terms and conditions to send their child to EF Academy Torbay, parents read a paragraph that says that they and their children agree that a student's name, photograph and achievement details may be used for promotions without written consent at the time or compensation. We also explain this in our parent handbook.

Following best practice, we also ask for the child's permission to use their image at the time of the event. This ensures that they are aware of the way the image is to be used to represent the activity in which they are engaged. We are currently developing a form for this purpose that is suitable for most of the situations that would come up.

The parental consent form covers the use of photographers or filmmakers at school events and the publication of the resulting films or photos.

Reporting and Responding to Concerns regarding Photography and Filming

Children and parents are informed, via the student and parent handbooks, that if they have any concerns regarding inappropriate or intrusive photography, these should be reported to the teachers/other staff member organizing and/or hosting/supervising the event.



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These reported concerns are dealt with via the same procedure our other child protection and safeguarding issues, ensuring the DSL is informed by the staff member.

Head Teacher/DSL/Pastoral Care staff¹

The Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads and those staff with specific responsibility for care (pastoral leads) undertake enhanced child protection training offered by TSCP and attend refresher training at 2 yearly intervals. All of these staff also receive the school's in-house Safeguarding, Reporting Procedures and Safe Working Practice Training each year (as described below for non-pastoral staff).

All Teaching and Non-Teaching Staff; New Staff Induction

The Head Teacher and all other school-based and non-school staff, including those engaged in regulated activity and non-teaching staff, undertake appropriate in-person training as specified by TSCP, to equip them to discharge their responsibilities for safeguarding and child protection effectively. This training is kept current by refresher training at yearly intervals in early September. All staff, including teachers, tutors, administrative staff, pastoral staff, temporary staff and maintenance personnel, are provided with access to the school's safeguarding/child protection policy and informed of the school's child protection arrangements on induction.

In addition to their general induction from the DSL, and any specialised safeguarding training as laid out above, all new staff receive safeguarding induction training that includes:

- School Safeguarding Policy
- Keeping Children Safe in Education, 2020 Part 1 and Annex A (and updates regarding FGM, Peer-on-Peer Abuse, CSE, Upskirting, Child Criminal Exploitation (CCE), serious violence and the Prevent Duty)
- The Staff Handbook to include Staff Code of Conduct

¹ Current PTSCP Foundation/Level 3 Trained Staff Positions: because of their specific involvement in the pastoral care of students, the training of these staff is refreshed every two years:

Deputy Head, DSL
Deputy DSLs
Head of Boarding



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- School Safeguarding Quick Reference Sheet (lays out procedure for reporting suspected abuse or disclosures to the designated safeguarding lead and/or Children's Services/Police.
- E-safety Policy (Online safety) including acceptable use of IT
- School Anti-Bullying Policy
- School Rewards, Behaviour and Sanctions Grid (Appendix of the Rewards, Behaviour and Sanctions Policy)
- Whistleblowing Policy
- Missing Person Policy
- Children Missing Education (CME) Policy and Safeguarding Responses

All staff sign to say that they have read the above documents and completed the specified training within two weeks of the start of the academic year.

In addition to initial and annual Prevent Duty training, all staff members have completed certificated online Prevent Duty training. New staff members will complete this online training within the first week of their employment.

Training will also be given based on the School's Responses to Peer-on-Peer Abuse Policy. This includes the various types of Peer-on-Peer abuse and the identification of Peer-on-Peer abuse. Staff understand that the reporting of Peer-on-Peer abuse should be handled in very much the same way as any other safeguarding concern.

New staff members, starting employment at any point during the academic year will be provided with the documents prior to the commencement of their employment and must undertake the specified training within the first week of their employment and sign to say that they have read the documents and completed the specified training within two weeks of the start of their employment.

The DSL also provides *ad hoc* training sessions from time to time on trending issues, on request from staff or line managers, and conducts training audits to assess other safeguarding training needs throughout the school's provision.

(General induction for all staff is given by the Head Teacher or an appropriate person designated by Head Teacher, and includes the Staff Code of Conduct.)

Host families

Host families are safeguarding and EF Academy Torbay reporting procedure trained and refreshed on an at least annual basis. All new host families are provided with a handbook, an induction and required to attend in-house safeguarding and reporting procedures training at least annually.



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Temporary and voluntary staff

Temporary and voluntary staff are made aware of the arrangements for reporting when they enter the school for the first time, and if they are working in the school or residences for longer than 24 hours they will be given safeguarding training by the DSL or other TSCP Foundation level 3 trained staff (Deputy Designated Safeguarding Lead, Heads of Boarding).

Student Information

- The school maintains the following information in a separate student welfare file:
- Names (including any previous names), address and date of birth of student
- Names and contact details of persons with whom the student usually resides
- Names and contact details of all persons sharing parental responsibility (if different from above)
- Emergency contact details (if different from above)
- Any relevant court orders in place including any that affect any person's access to the student (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- If the student is or has a Student Protection Plan (formerly known as being on the Student Protection Register)
- Name and contact details of key professionals in other agencies, including GP
- Any other factors which are likely to affect the safety and welfare of the child
- The student welfare file will be kept in a secure filing area and will be transferred to the student's new school upon leaving. The school will collate, store and agree access to this information

Types of abuse and neglect

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Signs of Physical Abuse:

- Burns, especially from cigarettes, that can't be explained
- Injury marks that have a pattern, like from a hand, belt, or other objects
- Injuries that are at different stages of healing



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- Medical or dental issues that go untreated
- Avoid any kind of touch or physical contact
- Be afraid to go home
- Seem to always be on high alert
- Wear clothing that doesn't match the weather -- such as long sleeves on hot days -- to cover up bruises
- Withdraw from friends and activities

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

Signs of Emotional Abuse:

- Constant worry about doing something wrong
- Speech problems or delays in learning and emotional development
- Depression and low self-esteem
- Doing poorly in school
- Extreme behaviour, such as being way too obedient or way too demanding
- Headaches and stomach aches with no clear cause
- The child doesn't seem close to a parent or caregiver
- Showing little interest in friends and activities
- Becoming Withdrawn

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. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways,



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or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of Sexual Abuse:

- Avoiding a certain person for no clear reason
- Bloody, torn, or stained underwear
- Bruising or bleeding around the genitals
- Pain or itching around the genitals that might cause problems walking or sitting
- Pregnancy or STDs, especially for boys and girls under 14 years old
- Refusing to change clothes in front of others
- Running away from home
- Sexual activity or knowledge that people usually have only when they're older
- Changes in language to sexually inappropriate language
- Sexualised actions or play

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

Signs of Neglect:

- Always looking dirty
- Being left alone or in the care of other young children
- Eating more than usual at a meal or saving food for later
- Doesn't get medical, dental, or mental healthcare
- Missing a lot of school
- Poor weight gain and growth
- Becoming withdrawn

Specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES website and NSPCC website. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:



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- bullying including cyberbullying
- child criminal exploitation (CCE)(Including County Lines)
- child sexual exploitation (CSE)
- children missing education (CME)
- children missing from home or care
- county lines
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence / County Lines
- gender-based violence/violence against women and girls (VAWG)
- hate
- honour based violence (HBV) (Including FGM and forced marriage)
- mental health problems
- missing children
- peer on peer abuse
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- Serious Violence (Including County Lines)
- trafficking
- upskirting

So called 'honour-based' violence (**HBV**) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including **Female Genital Mutilation (FGM)**, forced marriage, and practices such as breast ironing. All forms of so called **HBV** are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

Female Genital Mutilation (FGM) FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report personally to the police where they discover (either through disclosure by the victim or visual evidence (health care professionals) that FGM appears to have been carried out on a



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girl under the age of 18. Those failing to report such cases will face disciplinary sanctions. Further guidance can be found in the Multi-agency statutory guidance on FGM updated October 2018.

Preventing radicalisation – preventing children from the risk of radicalisation is part of the schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. From 1st July 2015, specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions to have 'due regard' to the need to prevent people from being drawn into terrorism. This duty is known as the **Prevent** duty.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. Effective engagement with parents / family should also be sought.

If you believe someone is at risk of **radicalisation** you can help them obtain support and prevent them becoming involved in terrorism by raising your concerns and making a referral. You can make a referral by phoning the confidential Anti-Terrorist Hotline on 0800 789 321, the regional PREVENT & Channel Lead on 01392 452328 or emailing prevent@devonandcornwall.pnn.police.uk. You can also raise your concerns with the DSL or Deputy Designated Safeguarding Leads or any member of school staff.

Further information on Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Further information on Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.



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Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines referred to above. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Further information can be found in the Multi-agency statutory guidance on FGM updated October 2018.

Further information on Preventing Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel. The relevant provisions of the Act came into force on 12 April 2015 and many local authorities already have Channel panels set up in their area.

Further information on Child Criminal Exploitation (CCE)

Children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support. Though perceptions are altering these young people are still often criminalised and perceived as having 'made a choice' to take part in illegal activity. Signs or indicators of CCE may be - Frequently absent from and doing badly in school. Going missing from home, staying out late and travelling for unexplained reasons. In a relationship or hanging out with someone older than them. Being angry, aggressive or violent. Being isolated or withdrawn. Having new, unexplainable items of significant or value.

Staff must immediately report to the DSL:

- any concern they have about a student who has suffered an injury, or is marked, or bruised in a way which is not obviously related to the normal knocks or scrapes received in play
- any explanation offered, by child, parent or carer, which appears inconsistent or dubious
- any behaviour or change in behaviour which could suggest that a child may have been abused (e.g. strange drawings or play, withdrawn)
- any comments children make which give cause for concern



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- any worries that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is displaying signs or symptoms of abuse or neglect
- any major changes in a child's behaviour, including non-attendance or tardiness
- any suggestion or disclosure of abuse from any person
- any concerns related to person(s) who may pose a threat to children (e.g. living in a household with children present)

Responding to Disclosure

EF Academy Torbay acknowledges that those who disclose such sensitive information may do so with reluctance or difficulty, having chosen carefully to whom they will speak. Therefore, all staff will handle disclosures with extreme sensitivity. Such information cannot ever remain confidential and staff will immediately relay what they have been told to the designated safeguarding lead and make a written record of the exchange.

It is not the responsibility of staff to investigate. They should try to glean enough information to hand on to the designated safeguarding lead in order that s/he can make an informed decision of what to do next.

In the case of a disclosure, staff should:

- not make promises of confidentiality, there is a duty to share this information and for the designated safeguarding lead to refer to Children's Services and/or the police
- listen to what is being said, without demonstrating shock or disbelief
- accept what is said
- reassure the child, but only as far as is sincere, don't make unrealistic or inappropriate promises
- reassure and alleviate guilt, if the child makes reference to it. For example, by saying, "You're not to blame", "none of this is your fault"
- not interrogate the child in any way; it is not appropriate to carry out any kind of investigation
- absolutely avoid leading questions (e.g. "Were you touched in an inappropriate place?"); ask open questions such as "Anything else you would like to tell me?" Use TED questions (Tell, Explain, Describe)
- avoid asking the child to repeat the disclosure for another staff member
- explain in an appropriate manner what needs to be done next and who will be informed
- write up the conversation as soon as possible afterwards; staff should bear in mind that taking notes during the disclosure itself may not be appropriate to the situation



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- record the date, time, place, any non-verbal behaviour, and write down as far as is possible, the words used by the child (do not paraphrase)
- record only statements and the observable - avoid interpretations or assumptions.
- IF THE CHILD DISCLOSES ANYTHING THAT WOULD LEAD YOU TO BELIEVE THAT A CHILD IS IN IMMEDIATE DANGER OR IS AT RISK OF HARM, CALL THE LOCAL CHILDREN'S SAFEGUARDING BOARD AND/OR 999 IMMEDIATELY AFTER THE DISCLOSURE AND INFORM THE POLICE. Immediately afterwards, inform the DSL that you have done this.

Action by the Designated Safeguarding Lead (DSL) (or deputy, or other senior staff member in their absence)

Following a disclosure, the DSL will consider:

- any urgent medical needs of the child
- whether to make an immediate child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately OR not to make a referral at this stage

The local strategic safeguarding partnership must be informed and provided with the evidence within 24 hours of a disclosure or suspicion of abuse and that the school will take no further action until the advice of the local safeguarding board has been obtained.

- whether an early help assessment is needed
- whether further monitoring is necessary
- wherever is possible, to inform parents, unless to do so could place a child at risk of significant harm, compromise any criminal investigation and/or place the member of staff or others at risk

If there is room for doubt as to whether a referral should be made, the DSL may consult with the TSCP MASH or early help advisors on a "no names basis" without identifying the family or the child. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to TSCP MASH within 24 hours. At all times the DSL will ensure the child's wishes or feeling are taken into account when determining what action to take and what services to provide.

Recording and monitoring

The school will record:

- any disclosures/accounts from the child or others, including parents (keeping original notes, signed and dated)



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- all concerns, discussions, summary of meetings, decisions, actions taken (dated, timed and signed) and specific arrangements for further monitoring/review.

All Child Protection documents on a child will be kept securely in a welfare file, separate from the child's main file. This will at all times be locked away and only accessible to the Head Teacher and Deputy DSL's.

These records will be duplicated and transferred to any school or setting the child transfers to, clearly marked "Child Protection, Confidential, for attention of Designated Senior Person Child Protection".

Reporting procedures regarding allegations or suspicions of abuse against staff or volunteers.

The following reporting procedures must be followed by all staff:

- Allegations against staff and volunteers are reported to the Head Teacher. If the report is made to the DSL about a member of staff or volunteer, the DSL informs the Head Teacher.
- Allegations or suspicions of abuse against the DSL are reported to the Head Teacher.
- Allegations or suspicions of abuse against the Head Teacher are reported to the Chair of Governors without informing the Head Teacher.

Where an allegation is made against any person working in or on behalf of EF Academy Torbay that he or she has:

- behaved in a way that has caused harm to a child or may have caused harm to a child;
- possibly committed a criminal offence against or related to a child; or
- has demonstrated behaviour towards a child or children that suggests that s/he is unsuitable to work with children;

any such allegation should be reported immediately to the DSL or Head Teacher as described above.

The DSL/Head Teacher must inform the LADO immediately and within one working day of all such allegations that come to an employer's attention of that are made directly to the police. All allegations must be reported to the LADO by the DSL or Head Teacher in the first instance before investigation commences. The LADO provides advice and presides over investigation of allegations or suspicions of abuse directed against anyone working in the school. The LADO must be informed of all allegations that come to the employer's attention.



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EF Academy recognises that such allegations, (as all others), may be untrue, malicious or unfounded. Staff are advised to bear this in mind at all times, maintain professional boundaries and be careful not to place themselves in a position which could lead to such an allegation. Safe Working Practice training, the School's Code of Conduct for Safe Working Practice and access to the DfE's Guidance Working Together to Safeguard Children 2019 are provided for this purpose.

- Where an allegation is made against a member(s) of the boarding team, who normally lives in the student residence, the school will make alternative arrangements to accommodate that individual(s) away from all student residences.
- Where an allegation is made about a supply teacher or agency member of staff, the agency will be fully involved.

Situations to avoid include:

- being alone with a student in a classroom with the door closed (including during any form of one-to-one tuition);
- allowing students to sit directly next to a driver in the passenger seat of a school related vehicle, e.g. a teacher's car or a taxi;
- do not offer students a lift in your car unless not to do so would put the student at greater risk;
- wearing inappropriate dress for the situation;
- contact with students on social networking sites/exchanging emails or other forms of electronic communications unless strictly related to school matters and on the school's email addresses and/or school network to enable monitoring
- initiating any kind of physical contact with any student

Staff should refer to the Code of Conduct for Safe Working Practices and the DfE publication 'Working Together to Safeguard Children 2019' for those working with children and young people in education settings for further advice, revisit the training materials on the school intranet and provided in the staff room or ask the DSL if they are in doubt about any situation.

Initial Action when there has been an allegation against staff or volunteers:

- The staff member who is witness to an allegation or observed an event must inform the Head Teacher or the Governor with Safeguarding Responsibilities immediately, as described above.
- If an allegation is made about a supply teacher or member of agency staff the Head Teacher will inform the agency and they will be invited to be fully involved in the follow-up process.



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- If an allegation is made against the school Head Teacher, the matter will be reported to the Chair of Governors or Executive Committee Member with responsibility for Safeguarding; they will make a decision as to who will proceed as Head Teacher for day-to-day running of the school whilst the matter is under review. The Chair of Governors would liaise with the LADO and act as Head Teacher in all further stages.
- The LADO must be informed immediately and within one working day of all such allegations that come to the attention of the Head Teacher or that are made directly to the police. All allegations must be reported to the LADO by the Head Teacher in the first instance before investigation commences. The LADO provides advice and presides over investigation of allegations or suspicions of abuse directed against anyone working in the school. The LADO must be informed of all allegations that come to the employer's attention.
- The Head Teacher (or person who is proceeding as 'Head Teacher') will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The Head Teacher must obtain written details of the allegation, signed and dated by the person receiving the complaint, or allegation.
- The Head Teacher must record any other information in relation to time, dates and location of incident(s) and names of any potential witnesses.
- The staff member will not be approached at this stage unless it is necessary to safeguard the immediate safety of children.
- The Head Teacher may require to clarify any information associated with the allegation, however no individual will be interviewed at this stage.
- Consideration will be given throughout to the support and information needs of students, parents and staff.
- The Head Teacher / Safeguarding Governor will inform the Chair of Governors
- Where a member of staff has harmed, or poses a risk to harm, to a child, or if there is reason to believe a member of staff has committed one of a number of listed offences and who has been removed from working in regulated activity, or would have been removed had they not left, then the school will report such to the DBS.

Peer on Peer Abuse

Procedures for dealing with abuse by one or more students against another student (Please read in conjunction with the School "Responses to Peer-on-Peer abuse Policy")

As well as having a right to attend school and learn in a safe environment free from harm by adults, our students have a right to also be free from harm from other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Rewards, Behaviour and Sanctions Policy. Sanction procedures are incorporated in EF Academy Torbay's Rewards, Behaviour & Sanctions Policy and Grid, and with reference to the Anti-



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Bullying Policy. An allegation of abuse would immediately become a 'high' level matter with the possibility of exclusion or expulsion to be dealt with by the Head Teacher. **Peer on peer abuse should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'.** Both the victim(s) of peer on peer abuse as well as the perpetrator(s) will be supported and thought given to whether s/he may be in need of early help or additional support.

Safeguarding allegations against other students

Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger child or a more vulnerable child;
- is of a serious nature and possibly includes a criminal offence;
- raises risk factors for other children in the school;
- indicates that other children may have been affected by this student;
- indicates that children or young people outside the school may be affected by this student

Examples of safeguarding issues against a student could include:

Physical Abuse

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse

- blackmail or extortion
- threats and intimidation

Sexual Abuse

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

Sexual Exploitation

- encouraging other children to attend inappropriate parties or engage in sexual acts



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- photographing or videoing other children performing indecent acts

Sexual Violence and Sexual Harassment

- Rape
- Assault by penetration
- Sexual jokes or taunting or making sexual comments
- physical behaviour, such as: deliberating brushing against someone, or touching bottoms

Sexting

- Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18
- It is an offence to possess, distribute, show and make indecent images of children
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.
- 'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety.

Initiation/Hazing type violence and rituals

- encouraging other children to engage in inappropriate sexual behaviour to become part of a group where there is a deprivation of privileges granted to other members
- Stunt or skit events with degrading, crude, or humiliating acts such as Sexual simulations or stimulations

Upskirting

- a form of sexual harassment that normally involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks.
- it often occurs in a public crowded place, making it hard for the victim to know that a photograph is being taken, victims are often distressed and feel humiliated.
- Upskirting is a criminal offence.

The school recognises that:



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- given a power imbalance, older students may attempt to influence the behaviour of younger students using any or all of the above methods.
- **given the gendered nature of peer on peer abuse, male students may attempt to influence the behaviour of female students using any or all of the above methods**
- children suffering from sexual exploitation themselves may be forced to recruit other children under threat of violence.
- **children with SEND may be more vulnerable to peer on peer abuse.**

However, peer on peer abuse can be perpetrated by a student of any age or gender, against a student of any age or gender and **all peer on peer abuse is unacceptable and will be taken seriously.**

Minimising the risk of safeguarding concerns towards students from other students

On occasion, some students will present a safeguarding risk to other students. The school should be informed by their family that the young person raises safeguarding concerns, e.g. if they are coming back into school following a period of expulsion from another school for bullying, or have been in custody for an assault, or they have experienced serious abuse themselves. Due to the nature of our student body being from all over the world, we can only do this to protect students if families inform our offices in their nation.

These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

When an allegation is made by a student against another student:

The DSL and other key members of staff consider whether the complaint raises a safeguarding concern. (If the initial staff dealing with the student/s who makes the disclosure determine or suspect that there is a safeguarding concern, the Designated Safeguarding Lead (DSL) should be informed immediately, just as they would if it is an adult perpetrator.)

A factual record will be made of the allegation, but no attempt at this stage will be made to investigate the circumstances.

The DSL contacts social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' files.



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If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).

It may be appropriate to exclude the student being complained about for a period of time according to our Rewards, Behaviour and Sanctions policy and procedures.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where we consider a safeguarding risk is present in the form of a student enrolled at our school, a risk assessment will be prepared along with a preventative, supervision plan. We will monitor the plan, and set a date for a follow-up evaluation with everyone concerned.

Any deficiencies or weaknesses in our Safeguarding Procedures will be remedied immediately by the Designated Safeguarding Lead and the Head of School when they become or are made aware of such weakness or deficiency.

This policy was approved by the School Board on: Sep 24, 2020

Designated Safeguarding Lead (Governing Body)

<u>ANNA IRELAND</u>	<u>Anna Ireland</u>	<u>Sep 24, 2020</u>
Name	Signature	Date

<u>Chairman (Executive Committee)</u> <u>JENS APPELKVIST</u>	<u>[Signature]</u>	<u>Sep 24, 2020</u>
Name	Signature	Date



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APPENDIX 1

1) Named personnel with designated responsibility for child protection

Staff member with designated responsibility for child protection (Designated Safeguarding Lead, DSL).

Robert Tasker 07976 860826 / EF Academy emergency phone (out of office): 07834 753135 / rob.tasker@ef.com

Deputy Designated Safeguarding Leads:

Kelly Hall 07852576891 / EF Academy emergency phone (out of office): 07834 753135 / Kelly.Hall@ef.com

Tina Desmond 07723368351 / EF Academy emergency phone (out of office): 07834 753135 /

tina.desmond@ef.com

ii) Contact Details for Children's Services for use in relation to children in need of help or who are the focus of concern.

Alison Botham, Director of Children's Services

Plymouth City Council and Torbay Council:

Torbay Safeguarding Children Partnership (TSCP)

Torbay Council

Union House

Union Street

Torquay

TQ1 3YA

Telephone: 01803 207176

<http://torbaysafeguarding.org.uk/>

To make a report directly to Torbay Children's Services MASH:

01803 208100, ask to be put through to the Multi Agency Safeguarding Hub; MASH@torbay.gov.uk



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Outside of office hours you can call the Emergency Duty Service on: 0300 456 4876
Hearing Impaired SMS: 07810 548004. The direct line to the Early Help Centre is 01803 208525

iii) Contact Details for the LADO

The Local Authority Designated Officer (LADO) for Torbay is Ivan Sullivan from 1st November 2015, the LADO role will be shared out on a duty basis amongst the Independent Reviewing Officers. The point of contact remains the same:- email cpunit@torbay.gov.uk or telephone: 01803 208541

Details of the LADO can be found here: <http://torbaysafeguarding.org.uk/workers/managing-allegations/> The LADO provides advice and presides over investigation of allegations or suspicions of abuse directed against anyone working in the school. The LADO must be informed of all allegations that come to the employer's attention.

Reporting Concerns about Radicalisation and Extremism

Staff would usually follow school safeguarding procedures for reporting concerns. They can also contact your local police force or dial 101 (the non-emergency number).

The Department for Education has dedicated a telephone helpline (020 7340 7264) to

enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk.

Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.



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APPENDIX 2

Designated Safeguarding Lead – Job Description

The Designated Safeguarding Lead will take responsibility for safeguarding children in the setting. They have a responsibility to liaise with local statutory children's services agencies and with the Local Safeguarding Children's Board. They will provide support, advice and guidance to any other staff on an on-going basis and on any specified safeguarding issue as required.

The role includes:

- Ensuring the setting is meeting its legal and statutory requirements
- Undertaking an annual review and if needed updating safeguarding and child protection policies and procedures
- Making sure safeguarding policies and procedures are fully implemented and followed by staff, students and volunteers
- Providing support, supervision and advice for any staff member, student and volunteer with a safeguarding or child protection concern
- Keeping their own training up to date
- Providing safeguarding induction for new staff, students and volunteers
- Ensuring that all staff are trained and a register is kept of staff who have completed child protection training
- Keeping all staff, students and volunteers informed of good practice and new legislation and guidance
- Having an understanding of the referral procedures and know how to contact and establish links with local authority or police
- Liaising with and making referrals to appropriate agencies about children where there are safeguarding concerns, including the Local Authority Designated Officer (LADO)



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- Dealing with allegations against staff
- Co-ordinating the early identification of vulnerable children and families and the involvement of mothers, fathers and carers
- Co-ordinating the development of integrated practice for vulnerable children and families
- Co-ordinating and supporting the setting when working with a child who has a child in need or a child protection plan
- Setting up a and managing clear, accurate and secure record keeping systems
- Overseeing the provision for online safety at the school and training for online safety



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APPENDIX 3

Safeguarding Concern Form (Concerns or Disclosure)

To be completed by the Reporting Staff Member. Once complete this form must be passed immediately to the Schools Designated Safeguarding Lead or, if she is not available, to the Deputy Designated Safeguarding Lead

Name of Staff Member completing the form	
Date of Concern/Disclosure	
Time of Concern/Disclosure	
Location or Situation of Concern/Disclosure	

Name of Student			
Gender:	Age:	Date of Birth:	Nationality:

Overview of Concern and Action Taken



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To be completed by the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead

Immediate Action Taken

Action Plan

Referral to LSCB	Y/N	N/A	Details	
Is the Headteacher Aware?	Y/N	N/A	Details	
Referral to Police	Y/N	N/A	Details	
Parents contacted	Y/N	N/A	Details	

Additional Actions

Action	Date and time	Outcome



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Name:	Date:
Position:	Signature:

APPENDIX 4

School Safeguarding Quick Reference Sheet

The school's Designated Safeguarding Lead is Rob Tasker, Deputy Head. If you have a safeguarding concern, or any questions about safeguarding, please direct them to Rob. No concern is too small to mention. Kelly Hall and Annie Hall are Deputy DSLs and safeguarding matters can be directed to either in Rob's absence.

Anyone can raise a concern and parental consent is not required for referral to statutory agencies.

- Raise the concern with the schools designated safeguarding lead (DSL), or if the DSL is not available, the Deputy DSLs (DDSL) or the Head Teacher. You will probably be asked to fill in a Safeguarding Concern Form, the template for which will be emailed around at the start of each term and can also be found on the G Drive: 'EF International Academy' in the folder 'Forms'.
- The DSL will refer cases of a child in need to children's social care; a child at risk to children's social care or to the police if a crime is thought to have been committed. This will happen as soon as possible but no later than one working day.
- You can refer your concerns directly to local Children's Services directly as well via the Plymouth & Torbay Joint Strategic Safeguarding Partnership (PTJSSP) 'hub' 208100 (all further contact details at the end of this policy) or the Early Help Centre on 208525. Out of hours you should call 0300 4564 876.
- Where there is risk of immediate serious harm to a child then a referral should be made to the police (999) immediately. If there is no immediate risk of harm, the 101 police number can be used or the referral can be made to the 'hub' as indicated above.
- If the child's situation does not appear to be improving, after the DSL is made aware, you should press for re-consideration.

While there are many reasons that you might be concerned for a student, it can be helpful to consider in summary the four broad categories of abuse:

- **Physical:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- **Emotional:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.



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- **Sexual:** 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.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Please ensure you have read and understood the School's safeguarding policy.

DSL: rob.tasker@ef.com 07976860826

Deputy DSL: kelly.hall@ef.com 07852576891

Deputy DSL: tina.desmond@ef.com 07723368351