

**THE KING'S SCHOOL
HARPENDEN**

**SAFEGUARDING
AND
CHILD PROTECTION
POLICY**



October 2010

Name: _____

Date Read: _____

SAFEGUARDING AND CHILD PROTECTION POLICY

Organisation Details

Charity: **Kingdom Education Limited** Charity No. **291913**
Company No. **1901401**

School Address: **The King's School** Tel No.: **01582 767566**
"Elmfield" Fax No.: **01582 765406**
Ambrose Lane Email: **office@thekingsschool.com**
Harpenden Website: **www.thekingsschool.com**
Herts, AL5 4DU

Regulators Details: **Ofsted** URN **117650**

Insurance Company: **Ansvar Insurance Co Ltd.**
Tel No.: 08456 020 999

The King's School is a primary and secondary school with pupils from age 5 to 16 years. The school also operates Highfield Preschool, for children ages 2 years 9 months to 4 years, located at the YWAM Oval. We provide quality academic preparation in an environment committed to the Christian ethos and lifestyle. Small classes and skilled teachers who are also committed to the ministry provide a caring environment in which we endeavor to assist parents in their responsibility to 'Train a child in the way he should go, and when he is old he will not turn from it' *Proverbs 22v6 (NIV)*.

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This document is based on “Guidelines to Churches - Protecting Children and Appointing Children’s Workers”, the 10th edition, supplied by the Churches Child Protection Advisory Service - a project of PCCA Child Care. A copy of the policy and all amendments will be filed with CCPAS. This policy must not be copied by other organisations without the written agreement of CCPAS.

Section 1 Our Commitment

At The King's School, we recognise the need to provide a safe and caring environment for children and young people. We acknowledge that our pupils can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to "all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status". We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from "all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child." As a school we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on the ten Safe and Secure safeguarding standards published by the Churches' Child Protection Advisory Service (CCPAS) and prepared in consultation with Hertfordshire County Council Guidelines.

The King's School recognises the importance of its ministry to children and young people and its responsibility to protect and safeguard the welfare of children and young people entrusted to the school's care.

As part of its mission, the School undertakes to:

- Value, listen to and respect children and young people as well as promoting their welfare and protection in an environment where children feel secure and are encouraged to talk.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Encourage and support parents/carers.
- Ensure that children who have been abused will be supported in line with a child protection plan, where deemed necessary.
- Include opportunities for children to develop the skills they need to recognise and stay safe from abuse.
- Endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- Provide on-going safeguarding training for all its workers and regularly review the guidelines attached.
- Ensure that the premises meet the requirements of the Disability Discrimination Act 1995 and all other relevant legislation, and that it is welcoming and inclusive.
- Support the Safeguarding Coordinator, also known as the Designated Senior Person (DSP), in their work and in any action they may need to take in order to protect children and vulnerable adults.
- File a copy of the policy and practice guidelines with CCPAS, and any amendments subsequently published. The Leadership agrees not to allow the document to be copied by other organisations.

Section 2. Recognising & Responding Appropriately to an Allegation or Suspicion of Abuse

Understanding Abuse and Neglect

Defining child abuse or abuse against a vulnerable adult is a difficult and complex issue. A person may abuse by inflicting harm, or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child.

In order to safeguard those in our school, we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19 which states:

1. Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also for adults the UN Universal Declaration of Human Rights with particular reference to Article 5 which states:

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Detailed definitions, and signs and symptoms of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy. (*Appendix 2.1, 2.2, 2.3 and Form 2.3*)

Safeguarding Awareness

The school leadership is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training and undertake recognised safeguarding training on a regular basis through CCPAS.

The school leadership will also ensure that children are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

Roles and Responsibilities

The Trustees have overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in the school. In particular the Trustees ensure:

- Child protection policy and procedures are written and reviewed
- Safe recruitment procedures
- Appointment of a Designated Senior Person who is normally a senior member of school leadership team
- Relevant child protection training for school staff/volunteers is attended
- Safe management of allegations
- Deficiencies or weaknesses in child protection arrangements are remedied without delay
- Safeguarding policies and procedures are reviewed annually

Responding to Allegations of Abuse – Please see Appendix 2.1, 2.2 & 2.3 and Form 2.3

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Following procedures as below:

The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to **Mrs Heather Lees** (hereafter the "Designated Senior Person") Tel No: **01582 767566**. She is nominated by the school leadership to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.

In the absence of the Designated Senior Person or, if the suspicions in any way involve the Designated Senior Person, then the report should be made to **Mr Andrew Reeves** (hereafter the "Deputy ") Tel No: **01582 767566**. If the suspicions implicate both the Designated Senior Person and the Deputy, then the report should be made in the first instance to the Churches' Child Protection Advisory Service (CCPAS) PO Box 133, Swanley, Kent, BR8 7UQ. Telephone 0845 120 4550. Alternatively contact Social Services or the police.

Where the concern is about a child, the Designated Senior Person should contact Children's Social Services.

Children Schools and Families (for advice) Tel no. **01438 737312**

Child protection referral to Children Schools & Families Tel no. **0300 123 4043** (in hours or out of hours)

Police Child Protection Team Tel no. **0845 3300 222**

Where required the Designated Senior Person should then immediately inform the insurance company and other strategic personnel within The King's School.

Mr Clive Case (Principal)

Tel no. **01582 767566**

Mr David Crook (Chair of Trustees)

Tel no: **01582 767566**

Mr Graham Cracknell (Safeguarding Trustee)

Tel no: **01582 767566**

Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.

Whilst allegations or suspicions of abuse will normally be reported to the Designated Senior Person, the absence of the Designated Senior Person or Deputy should not delay referral to Social Services, the Police or taking advice from CCPAS.

The Leadership will support the Designated Senior Person/Deputy in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.

It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from CCPAS, although the Leadership hope that members of the school community will use this procedure. If, however, the individual with the concern feels that the Designated Senior Person/Deputy has not responded appropriately, or where they have a disagreement with the Designated Senior Person(s) as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this statement that the Leadership demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable.

The role of the Designated Senior Person/ Deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies that have a legal duty to investigate.

Allegations involving School Staff/Volunteers ('Whistle Blowing')

Whenever it is alleged that a member of staff/volunteer has:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved toward a child in a way which indicates s/he is unsuitable to work with children the person receiving the allegation must immediately inform the DSP and the Principal.

They should also make a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, what was said and anyone else present. This record should be signed and dated and passed to the DSP and the Principal. If the concerns are about the Head Teacher or the DSP, then the Chair of Trustees and/or the Safeguarding Trustee should be contacted on the numbers listed above.

Please see Appendix 2.4 for The King's School Whistleblowing Policy

Detailed Procedures where there is a Concern about a Child

Allegations of Physical Injury, Neglect or Emotional Abuse

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Designated Senior Person/Deputy will:

- Contact Children's Social Services (or CCPAS) for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- Not tell the parents or carers unless advised to do so, having contacted Children's Social Services.
- Seek medical help if needed urgently, informing the doctor of any suspicions.
- For lesser concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children's Social Services direct for advice.
- Seek and follow advice given by CCPAS (who will confirm their advice in writing) if unsure whether or not to refer a case to Children's Social Services.

Allegations of sexual Abuse

In the event of allegations or suspicions of sexual abuse, the Designated Senior Person/Deputy will:

- Contact the Children's Social Services Department Duty Social Worker for children and families or Police Child Protection Team direct. They will NOT speak to the parent/carer or anyone else.
- Seek and follow the advice given by CCPAS if, for any reason they are unsure whether or not to contact Children's Social Services/Police. CCPAS will confirm its advice in writing for future reference.

Children who are the Subject of a Child Protection Plan

- Particular attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a child protection plan (formerly referred to as the Child Protection Register) and a written record will be kept.
- If a pupil who is/or has been the subject of a child protection plan changes school, the Designated Senior Person will inform the social worker responsible for the case and transfer the appropriate records to the Designated Senior Person at the receiving school, in a secure manner, and separate from the child's academic file.

Allegations of Abuse against a Person who works with Children

If an accusation is made against a worker (whether a volunteer or paid member of staff) whilst following the procedure outlined above, the Designated Senior Person, in accordance with Local Safeguarding Children Board (LSCB) procedures will need to liaise with Children's Social Services in regards to the suspension of the worker, also making a referral to a Safeguarding Adviser (SA) / Local Authority Designated Officer (LADO) on **07920 283106** or **07995 288271**

Section 3. Prevention of Abuse

Safe Recruitment

The Leadership will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and a self declaration form
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A criminal records disclosure has been completed (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

It is the role of the **Designated Senior Person** for Child Protection to:

- Ensure that he/she receives refresher training at two yearly intervals to keep his or her knowledge and skills up to date
- Ensure that all staff who work with children undertake appropriate training to equip them to carry out their responsibilities for child protection effectively and that this is kept up to date by refresher training at three yearly intervals
- Ensure that newly appointed staff receive a child protection induction
- Ensure that temporary staff and volunteers are made aware of the school's arrangements for child protection
- Ensure that the school operates within the legislative framework and recommended guidance
- Ensure that all staff and volunteers are aware of the Hertfordshire Safeguarding Children Board Child Protection Procedures
- Ensure that the Head Teacher is kept fully informed of any concerns
- Develop effective working relationships with other agencies and services
- Decide whether to take further action about specific concerns (e.g. refer to Children, Schools and Families)
- Liaise with CCPAS or CSF social care teams over suspected cases of child abuse
- Ensure that accurate records relating to individual children are kept separate from the academic file in a secure place and marked 'Strictly Confidential' and that these records are passed securely should the child transfer to a new provision
- Ensure that the school effectively monitors children about whom there are concerns, including notifying CSF of the absence of a child who is the subject of a child protection plan
- Provide guidance to parents, children and staff about obtaining suitable support

Management of Workers – Codes of Conduct

As a Leadership we are committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a code of conduct towards children and young people. The school leadership undertakes to follow the principles found within the 'Abuse Of Trust' guidance issued by the Home Office and it is therefore unacceptable for those in a position of trust to engage in any behaviour which might allow a sexual relationship to develop for as long as the relationship of trust continues.

Please see Appendix 3 for

1.0 Discipline and Behaviour Management

1.1 Codes of Conduct

1.2 Restrictive Physical Intervention Policy

3.3 Risk assessment & management plan for children or adults who present a risk of harmful behaviour

Section 4. Pastoral Care

Supporting those affected by Abuse

The school leadership is committed to offering pastoral care, working with statutory agencies as appropriate, and support to all those who have been affected by abuse who have contact with or are part of The King's School.

Section 5. Practice Guidelines

At The King's School we operate and promote good working practice. This enables workers to run activities safely, develop good relationships and minimise the risk of false accusation. As well as a general code of conduct for workers we also have specific good practice guidelines for every activity we are involved in and these are attached or would be developed for any additional activities.

5.1 Duty of Care and Positions of Trust

The Children's Act 2004 (England) through the Stay Safe outcome of 'Every Child Matters Change for Children' programmes, places a duty on organisations involved in providing services for children and young people to safeguard and promote their well-being. This means all workers should treat those they are caring for with respect and dignity as well as demonstrate competence and integrity.

The duty of care is in part exercised through the development of respectful and caring relationships but also by workers taking all reasonable steps to ensure the safety and well-being of those they have responsibility for, particularly in relation to sexual, physical and emotional abuse. Before individuals start working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent to their role.

In addition, under Health and Safety at Work legislation, organisations have a duty of care towards the well-being of all workers and ensure they are treated fairly. They are required to provide a safe working environment and guidance on safe working practice.

All adults working with children and young people are in positions of trust. It is therefore vital workers ensure they do not, even unwittingly, use their position of power and authority inappropriately. Workers should always maintain professional boundaries and avoid behaviour which might be misinterpreted. Any kind of sexual relationship between an adult worker and a child is never acceptable and if concerns arise in this area, this should be recorded and reported to the Safeguarding Co-ordinator.

The trusting relationship between worker and child and young person means the worker should never:

- use their position to gain access to information for their own or others' advantage
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine
- use their status and standing to form or promote relationships that are or may become sexual

Please see appendix 5.1 and 5.2 for further guidance

Confidentiality

Adults may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned.

If an adult who works with children is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member of staff or nominated child protection person. Any actions should be in line with locally agreed information sharing protocols.

Additionally, concerns and allegations about adults should be treated as confidential and passed to a senior manager without delay.

The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998. Employers should provide clear advice to adults about their responsibilities under this legislation.

Whilst adults need to be aware of the need to listen to and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child young person under any circumstances.

Making a Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not inappropriate behaviour for adults in all circumstances. There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. Such judgements, in these circumstances, should always be recorded and shared with a senior manager or if the adult does not work for an organisation, with the parent or carer. In undertaking these actions individuals will be seen to be acting reasonably.

Adults should always consider whether their actions are warranted, proportionate and safe and applied equitably.

5.2 Gifts, Rewards and Favouritism

The giving of gifts or rewards to children and young people can be part of an agreed policy for supporting positive behaviour or recognising particular achievements. In some situations, the giving of gifts as rewards may be accepted practice for a group of children, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan with the knowledge of a manager and the parent or carer.

Any gifts should be given openly and not be based on favouritism. Adults need to be aware however, that the giving of gifts can be seen as a gesture to bribe or groom a young person. Adults should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.

Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment.

There are occasions when children, young people or parents wish to pass small tokens of appreciation to workers, for example, on special occasions or as a thank-you, and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

5.3 Risk Assessments

Taking care of children and young people involves taking responsibility for their well-being at all times, being prepared for unforeseen eventualities, anticipating situations where they could be harmed and taking steps to minimise the risks.

Organisations have a responsibility to assess the risk involved in the activities that are provided. This can include an informal check before the start of an activity that the building is safe and that the planned activities have been assessed for any risks.

It is advisable to appoint someone specifically for carrying out risk assessments. An easy and effective way of doing this is to compile a checklist for the activity, identifying any risks that could be encountered, the action required, the person responsible to carry this out and when any action has been completed.

The following are some areas that should be considered:

Identification of Hazards

- Consider who might be harmed and how this might happen.
- Assess the risks and take action to remove or reduce them as far as possible.
- Record details of the action taken.
- In a building the following may be considered hazardous: loose-fitting carpets, uneven floors, over-filled cupboards, very high shelves, blocked fire exits, glass doors, missing light bulbs, overloaded power points, trailing electrical cables, loose window fastenings.

Please see Appendix 5.3 for how to carry out a risk assessment

5.4 Safety of Buildings and Equipment

Buildings being used for groups or activities should be properly maintained. The external fabric of the building, plus all internal fixtures, fittings, lighting, fire exits and equipment should meet the required safety standards. An annual review should also be carried out and, where necessary, action taken. All electrical equipment should have undergone an electrical safety test. In the UK these are known as PAT (Portable Appliance Inspection) tests.

Outside play areas should be appropriately fenced off with secure/boltable gates to prevent small children from straying from the premises. Safety requirements could also be publicly displayed on posters in appropriate locations around the building.

The person responsible for this is **Mrs E Taylor**. *Please see Appendix 5.4 for guidance.*

5.5 Food and Drink Safety and Hygiene

Any food that is made and/or consumed on the premises should meet food safety regulations. It follows therefore that there should be someone within the organisation who has responsibility for this. They should possess a Basic Food Hygiene Certificate or equivalent and be knowledgeable in areas such as food preparation, handling, storage, disposal of waste etc. This is relevant to all organisations and especially to those running camps and other residential activities.

If food and drink are provided during an activity, the following should be considered:

- Workers should follow good personal hygiene.
- Basic health and hygiene regulations should be adhered to.
- All food and drink is stored appropriately.
- Hot drinks should not be carried through an activity area and not placed within the reach of young children.
- Snacks and mealtimes are appropriately supervised.
- Fresh drinking water is available at all times.
- Systems are in place to ensure that children, young people or vulnerable adults do not have access to food/drinks to which they are allergic. Typically this can be peanuts, nuts, milk, eggs, fish, shell fish and gluten - found in wheat, barley and oats.

Useful Contact

The Food Standards Agency is an independent Government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food. Telephone helpline: 020 7276 8829, email: helpline@foodstandards.gsi.gov.uk, Website: <http://www.food.gov.uk> or <http://www.foodstandards.gov.uk>. The person responsible for Food and Drink Safety and Hygiene is **Mrs Eleanor Taylor**.

Please see further guidance in Appendix 5.5 and guidance folder in the main classroom kitchen.

5.6 First Aid

Provision should be made for an appropriately qualified first-aider to be available at all activities together with an adequate First Aid kit.

Under the Health & Safety (First Aid) regulations it is the duty of every employer to provide at least one first aid container for each work site. Its contents should be stored in a waterproof container and the designated worker should regularly check the contents.

First Aid and Administration of Medication

It is expected that adults working with children and young people should be aware of basic first aid techniques. It is not however, a contractual requirement and whilst adults may volunteer to undertake such tasks, they should be suitably trained and qualified before administering first aid and/or any agreed medication.

When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered. In circumstances where children need medication regularly a health care plan should have been established to ensure the safety and protection of children and the adults who are working with them. Depending upon the age and understanding of the child, they should where appropriate, be encouraged to self administer medication or treatment including, for example any ointment, use of inhalers.

The person responsible for First Aid is **Mrs Lynette Hughes**.

Please see Appendix 5.6 for First Aid Kit contents

5.7 Safeguarding Principles for Group or Activity

Some general principles for running a club, activity or service include:

- Ensuring that everyone is treated with dignity and respect in attitude, language and actions.
- Consideration for the number of workers needed to run the group and whether they should be male, female or both.
- A clear strategy for summoning additional help (if needed) in situations where a worker is working alone with a child or young person.
- The level of personal care (e.g. toileting) required appropriate to the needs of the individual.
- Clear guidelines on personal privacy e.g. when working with children avoiding questionable activity such as rough or sexually provocative games and comments.
- Not allowing anyone under 16 years of age to be left in charge of children of any age or those attending the group being left unsupervised.
- Only workers assigned to the group being allowed to participate in the activity. Other adults should not be allowed free access.

- Making a note of other people in the building during the activity and any other events taking place at the same time.

5.8 Adult to Child Ratios

In order to supervise children's activities safely it is necessary to have sufficient adult leaders and helpers. In the past CCPAS has relied on OFSTED recommendations but since the introduction of the statutory framework for the Early Years Foundation Stage (www.nationalstrategies.standards.dcsf.gov.uk), the following ratios should be applied:

- There are a number of additional provisos in regard to the qualifications for these staff and the experience of those staff, but in terms of children aged 2 in an early years setting there needs to be at least one member of staff for every 4 children.
- Children aged 3 and over in a registered early years provision, there needs to be at least one member of staff for every 13 children. Again there are a number of provisos, namely that this is between the hours of 8.00 am and 4.00 pm, and the provisos relate to the qualifications of those staff members. At other times outside of the hours of 8.00 am – 4.00 pm, and where it is within those hours but people have less qualification then the ratio alters to one staff member for every 8 children.

A risk assessment should be carried out for activities and especially where it is:

- outdoors
- high risk or dangerous
- when catering for people with disabilities or special needs

The results of the risk assessment may mean ratios need to be increased. The most important thing is to be specific in written guidance and expectations.

Please see Appendix 5.3 for how to carry out a risk assessment.

Please see Appendix 5.8 for further information

5.9 Data Protection, Human Rights and Safeguarding

The Data Protection Act 1998 is designed to provide privacy protection for individuals about whom certain personal information is kept. It lays down 'best practice' principles for those who keep the data and it applies to paper records as well as computerised information. The Act covers the whole of the UK, and all organisations, including places of worship, must comply with the rules on processing data.

Where disclosing information might place a child or young person at risk, then safeguarding considerations take precedence over data protection. In certain circumstances the Data Protection Act allows for disclosure of information without the consent of the person involved, including for the prevention or detection of crime, or the apprehension or prosecution of offenders. The European Convention of Human Rights also makes provision for the disclosure of information in connection with 'the protection of health or morals, for the protection of the rights and freedoms of others and for the prevention of disorder or crime.... Disclosure should be appropriate for the purpose and only to the extent necessary to achieve that purpose'.

Children, young people and vulnerable adults have the right to be protected from harm. For example, information relating to concerns that a child is at risk of significant harm should therefore not be withheld on the basis that it might be unlawful.

Information about allegations or concerns of abuse should not be shown to a parent or carer. Advice should always be sought from Children's Social Services, Adult Services, or the police. CCPAS can also advise in such circumstances.

Useful Contacts: The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Information Line: 01625 545 745, Switchboard: 01625 545 700, email: data@dataprotection.gov.uk; www.dataprotection.gov.uk

Please see Appendix 5.9 for further guidance

5.10 Registration

When a child joins the school, a general information and consent form is completed and returned giving contact details of parents/carers, plus medical and other details such as allergies or special dietary requirements. This form is renewed annually.

Form 5.10 for the General Information and Consent Forms

A register of those attending school is also maintained, together with a register of workers. This includes a record of arrival and departure times, particularly if the participant does not attend the whole day.

5.11 Keeping Records

Records should be kept of any activity or conversation which causes concern. This may be very helpful if, for example, teachers have to deal with a difficult child or young person who subsequently makes an accusation of assault or a young person repeatedly makes sexual comments about workers that may, at a later date, result in an allegation of abuse. In this situation, written records would enable any allegations to be seen in context.

Patterns of behaviour or concerns might also emerge from log records that might not otherwise be so obvious - for example, bruising noted on a regular basis or a number of young people making similar comments about one worker that raises concerns. Other information might include records of incidents such as fights and the action taken. Logbooks safeguard both children and teachers.

Every child, young person, parent or carer should be able to view what is recorded about them in the logbook. This information would need to be kept in a way that does not breach the confidentiality of an individual. Whilst it is important to observe data protection requirements, remember safeguarding is always the priority. Information about the prevention and detection of crime is exempt from data protection requirements. It may, therefore, be inappropriate to release information to a parent, which has been disclosed by a young person, without first consulting the statutory agencies.

Information of a sensitive nature (e.g. a child disclosing abuse) will need to be kept separately in a secure place. However, a cross reference could be recorded in the logbook along the lines of "Jenny spoke to Bill tonight - see separate note in her file". In certain circumstances this information would need to be cross referenced between records. The experience of CCPAS is that concerns can be raised many years after an event and therefore records should be kept indefinitely as advised by insurance companies.

5.12 Accidents

All accidents, however minor, should be recorded in an accident book. In the event of an accident, the parent/carer of a child or young person should be contacted and a letter/sticker sent home with the child.

Form 5.12 Accident and Incident Form

5.13 Peer-group Activities (children and young people)

All peer-group activities are overseen by named adults who have been selected in accordance with agreed recruitment procedures and have the backing of the leadership of the organisation.

Before setting up a peer-led activity the following should be taken into consideration:

The appropriateness of the venue for the activity

Any medical issues, dietary needs and allergies will be appropriately managed.

Emergency contact numbers are to hand for all members under the age of 18 years.

If the provision of food is part of the activity, leaders must ensure that food is prepared in accordance with Basic Food Hygiene standards.

If a peer-led activity involves under-8s and lasts for two or more hours a week for more than five days a year, it will need to be registered with OFSTED. If in doubt, contact them for advice.

The following should also be followed:

If there are children/young people under 16yrs at an activity, adult workers should be present or within earshot.

No person under the age of 16 should be left with the sole responsibility of caring for or supervising other children.

Young people (over 16) who assist with caring for other children/young people should be subjected to the same recruitment process as adults and have undertaken safeguarding training.

Peer-group leaders should be aware of safeguarding procedures, including reporting concerns (e.g. abuse, bullying) to their supervising adult and that sensitive information should not be shared openly in the group.

Parents/carers must always be kept informed about what peer-group activities are for, who the leaders are, how they are run, where they meet and what parents can do to support them.

5.14 Suggestions and Complaints by Parents/Carers

Where a parent or carer wishes to make a complaint or make a suggestion about any activity or group the school is providing, it should be taken seriously. It is a good idea in the first instance for them to speak to the teacher concerned who should endeavour to resolve the matter.

This should be followed up by a written response to the issue that has been raised and should be recorded and stored appropriately. The head teacher should also be kept informed.

If a complaint is not resolved to the satisfaction of the parent or carer then the matter should follow complaints procedures within the organisation. This should be readily available for anyone to see.

The above refers to complaints of a general nature. In the case of safeguarding concerns, these should follow the procedures in the safeguarding policy.

Please see Form 5.14 and Appendix 5.14 for further information on The King's School complaints procedure

5.15 Working with Disruptive Children and Young People

Sometimes children and young people become angry, upset or disruptive. Occasionally their behaviour may endanger themselves or others. The Government has developed national standards in relation to early years and day care and the following guidelines are adopted by The King's School. If someone is being disruptive:

- Ask them to stop.
- Speak to them to establish the cause(s) of the upset.
- Inform them they will be given time out if the behaviour continues.
- Warn them if they continue to be disruptive, they will be referred to the relevant head teacher.

If they are harming themselves, another person or property then others in the group should be escorted away from the area where the disruption is occurring. At the same time, and with a second teacher present, request them to STOP. If your request is ignored, you might need to warn the individual that you will consider calling the Police. As a last resort, in the event of them harming themselves, other people or property, physical restraint may be needed until the Police arrive. The teacher involved should always record what happened in writing as soon as possible after the incident. This should include:

- What activity was taking place.
- What might have caused the disruptive behaviour.
- The person's behaviour.
- What was said and how the worker and others responded.
- A list of others present who witnessed the incident.

A copy should be given to the head teacher, a copy retained by the worker and a copy kept with the logbook. Parents should be informed if their child has been restrained.

Please see Appendix 3 for

3.0 Discipline and Behaviour Management

3.1 Codes of Conduct

3.2 Restrictive Physical Intervention Policy

3.3 Risk assessment & management plan for children or adults who present a risk of harmful behaviour

5.16 Anti- bullying Policy and Practice (children & young people)

Objectives of this policy

All children, workers, parents and carers should be aware of the anti-bullying policy within the organisation and what they should do if bullying arises.

All teachers should have an understanding of what bullying is, be aware of possible signs it is happening and follow the policy when it is reported.

Children and parents/carers should be assured that they will be supported when bullying is reported

Prevention

Strategies can be adopted to prevent bullying. As and when appropriate, these may include:

- Writing a set of group rules.
- Signing a behaviour contract.
- Having discussions about bullying and why it matters.

Procedures

- Report the bullying incident to children's teacher.
- Ensure that details are carefully checked before action is taken.
- In all cases of bullying, the incidents should be recorded by the teacher.
- Consideration should be given to informing the parents/carers of the bully, but this should only be done if the teacher is satisfied there is no bullying/abuse going on at home that might exacerbate the situation.
- If it is thought that an offence has been committed, consideration should be given to contacting the police.
- The bullying behaviour or threats of bullying must be investigated and stopped quickly.
- Help should be offered to help the bully address his/her behaviour.

Outcomes

- The children's teacher involved in dealing with the incident should issue a warning to the child concerned.
- An apology should be given by the child who has bullied another.
- If possible, those involved will be reconciled.
- After the incident has been investigated and dealt with, the situation should be monitored to ensure repeated bullying does not take place.
- After the incident/incidents have been investigated parents/carers should be informed of the action taken.
- All incidents must be recorded in the log book.

Please see The King's School staff handbook and Appendix 5.16 for further guidance

5.17 Tobacco and Alcohol

There is now a smoking ban in all enclosed public spaces throughout the UK and a no-smoking policy is enforced on the premises of The King's School.

It is illegal for anyone under the age of 18 in England and Wales to be sold cigarettes (or other products like roll-up tobacco and cigars) over the counter or at a vending machine. The King's School imposes a no-smoking policy, so it is important all those attending are aware of and agree to abide by it.

There are also strict regulations on the sale and consumption of alcohol where children and young people are concerned and The King's School enforces a no-alcohol policy.

5.18 Solvents and Illegal Substances.

Teachers should be alert to possession and use of illegal substances.

If a teacher becomes aware a child or young person may be abusing solvents they will inform their parents who will be encouraged to seek professional help from their doctor or a counsellor specialising in this area. Having said this, it is a criminal offence to allow anyone attending the school to supply illegal drugs or use them on the premises. The King's School therefore adopts a zero tolerance policy on all illegal substances. The school will act in line with their discipline policy and will involve the local police in such situations.

For the individual involved:

- Ask them to stop, warning them of the consequences if they do not e.g. suspension or ban from the group.
- Inform parents/carers if the young person is under 16 years.
- Inform the parents/carers if the young person is over 16 years (with their permission).

- Discuss with the young person the proposed course of action, particularly if they re-offend (e.g. informing the police).
- Write down the content of any discussion with the young person, including the action taken and keep this in a secure place.
- Liaise with the police to devise a strategy for dealing with the use of illegal substances.

Please see Appendix 5.18 for COSSH Guidance and The King's School COSSH Policy

5.19 Special Needs and Disabilities

Teachers should be aware that any child, young person or vulnerable adult attending an activity who has a special need or disability may need extra help in areas such as communication and mobility (e.g. use of sign language and assistance in going to the toilet). They may behave in a non-age appropriate way so it is important to set appropriate boundaries that take their needs into account, but also protect teachers from false accusation.

The school will aim to:

- Ask the child or young person attending the school, and parents or carers how their needs can be met, ensuring all teachers involved with them are aware of their expectations. This includes the number of teachers needed to assist for a specific activity to prevent injury. Some of these needs may be more easily met than others, so be realistic. Listen, and give feedback to the person, family or carer as to what can or can't be achieved and the reasons why.
- Ensure that a teacher of the same gender assists if they need help with toileting, but again discuss with the person, their family or carer to discuss their preference and your ability to provide this.
- Make buildings accessible (e.g. ramps, toilets for the disabled and hearing loop system) and encourage integration within the group.
- Develop appropriate disability awareness including the use of different forms of communication (e.g. sign language) and language etiquette.

Please see Appendix 5.19 for further guidance

5.20 Intimate care

In The King's School and Highfield Preschool intimate care may be provided for small children e.g. those attending preschool, and for children with disabilities. Teachers should therefore be following clear guidelines in this area.

Teachers involved with intimate care need to be sensitive to the individual needs of each person and that some care tasks could be open to misinterpretation. False allegations of sexual abuse are extremely rare but guidelines will safeguard both the children and adults. People feel safer if expectations are clear and methods of working are, as far as possible, consistent.

Please see Appendix 5.20 for further guidance

5.21 Outings

From time to time the school arranges day trips or visits offsite for children and young people under 18 for which parents or carers complete and sign a consent form for the activity. Parents or carers who volunteer to assist on these trips do so under the supervision of the lead class teacher/trip

organiser and are required to complete a Self Declaration Form prior to the activity. The school also carries out a risk assessment of the activity to ensure all eventualities are covered and all adults in the team know what to do in the event of an accident or emergency.

On the day it is important to remember to take a fully charged mobile phone, all essential records and equipment and allocate named children to named pairs of adults.

Please see Appendix 5.21 and Form 5.21 for further guidance on outings and consent form.

Please see Form 5.21A for the Parent Helper Self Declaration Form

Please see Appendix 5.3 for how to carry out a risk assessment

5.22 Transportation

There will be occasions when adults are expected or asked to transport children as part of their duties. Adults who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Adults should also be aware of current legislation and adhere to the use of car seats for younger children. Where adults transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV1- staff should ensure that they have an appropriate licence and insurance to drive such a vehicle.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Where children or young people are being transported by mini-bus, the school needs to ensure there are guidelines in place and that these apply to all drivers and journeys carried out on behalf of and with the knowledge of the organisation. This does not apply to private arrangements for transportation made, for example, between adults with parental responsibility.

Advice for transporting children, young people or vulnerable adults is as follows:

- Driving should be restricted to those who have gone through the organisation's recruitment procedures for workers.
- All drivers must have read the safeguarding policy of the organisation and agree to abide by it.
- Parents / carers should be asked to sign a Transportation Consent Form (or include it in the General Information and Consent Form).
- The driver should hold a full driving licence, the vehicle must be adequately insured and the vehicle road worthy.
- Having checked drivers, it is reasonable to expect that they may be alone with a child for short periods. Consideration should therefore be given to dropping off the least vulnerable last and plan routes accordingly. Two workers in a vehicle does not in itself guarantee safety - there have been incidents where workers have acted abusively together.
- Drivers should not spend unnecessary time alone in the vehicle with someone they are transporting. If, for example, a child wants to talk to a driver about something and has waited

until other children have been dropped off, the driver should explain that it isn't convenient to talk there and then, but arrange to meet them at a location where there are other adults around with the knowledge of the group leader. (Remember they may want to talk to the driver about an abusive situation).

- When travelling in groups with more than one vehicle it is good practice to insist those being transported stay in the same groups on the out-going and return journey. This will avoid anyone, at worst, being left behind.
- At collection or dropping off points no child or young person should be on their own and the driver should make sure they are collected by an appropriate adult.
- It is advisable to be aware of instances where it may be unwise for a particular driver to transport a particular individual e.g. where there has been a disagreement or they have romantic feelings for a driver.
- If parents or carers do some transporting, ensure they are made aware that such arrangements are their own responsibility and not the school's.

Please see Appendix 5.22 and Form 5.22 for further guidance and consent forms relating to transportation

5.23 Swimming Trips

There should be an increased adult to child ratio for all swimming trips and prior to the trip the swimming ability of a child/young person should be established. A swimming consent form for each child (or a copy) is taken by the group leader on the trip. A copy is also be retained by the contact person at the school.

Before any visit to a swimming pool check:

- there will be a qualified lifeguard present at all times
- first aid/rescue equipment is readily available and this would preferably include a poolside telephone/alarm.

If appropriate to your party, check that the pool caters for children with disabilities. There should be adequate signs indicating the depth of the pool and depending on the age of the group you are taking, it is advisable to make sure that the shallow end is shallow enough! If the maximum depth of the pool is less than 1.5 metres, diving should not be permitted.

Checks should be made that the changing rooms are safe and hygienic and there is a changing room for each sex. They should be supervised while children are in there by at least two leaders per changing room. They should be of the same gender as the children, but supervised in such a way that the leaders do not watch the children actually getting changed. It may sound obvious but it is inadvisable for children to swim immediately after eating.

Children and children's teachers should follow the rules of the pool. It is important children and young people know how to behave and take their lead from workers' own behaviour. Group leaders should supervise behaviour at all times and there should be a minimum of two leaders present while the children are in the pool.

Whilst the pool's lifeguard will be on duty to supervise swimmers this does not reduce the duty of care of leaders and teachers, including being able to account for the whereabouts of all those participating in the event.

It is worth bearing in mind that because water activities often involve partial nudity, potential abusers are more inclined to make advances. This may include the person lingering around changing rooms or toilets. One way to supervise visits to the toilet is to use the responsible buddy

system, i.e. two or three go to the toilet together. One uses the toilet whilst the others stand outside the door.

Swimming or paddling in the sea, rivers, lakes or other natural waters are potentially dangerous activities and a risk assessment must be completed before organising such an activity. Prior to organising a visit to open waters group leaders can look on local websites or contact the local tourist information to make sure the area is safe.

Swimming in the sea or other natural waters should be allowed only as a supervised activity, preferably in a recognised bathing area with a qualified lifeguard present. Obviously weather conditions should be taken into account. Even with lifeguard cover children should always be in the sight of the group leader and team. One of the team should stay out of the water for better surveillance and preferably hold a relevant life-saving certificate. Leaders must ascertain the level of the children's swimming ability and ensure adequate, increased supervision ratios for the particular group.

The limits of the swimming area need to be explained to the children before they enter the water along with other matters specific to the location. In addition, signals of distress and recall need to be adopted and clearly explained.

It is important to establish a base to which members of the group may return if separated.

Please see Appendix 5.23 and Form 5.23 for further guidance and consent form for swimming trips

5.24 Residential Trips

Adults should take particular care when supervising children and young people on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries. .

Where activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, young people, adults and parents should be informed of these prior to the start of the trip. Wherever possible, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff especially on overnight stays.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace.

If using an established residential centre, checks should be made that it operates a safeguarding policy and carries out Disclosure checks on workers. Organisations providing residential holidays should also carry out full risk and health and safety assessments. It is easy to assume that teachers automatically know how to organise and run activities, and that children and young people have been taught personal safety. This is not necessarily the case so it is doubly important the organisation's expectations are clear and are communicated effectively.

Please see Appendix 5.24 for further guidance

5.25 Filming and taking photographs

Since the introduction of the Data Protection Act in 1998, organisations must be careful if they want to take photographs or film footage of people, and how images are used. This does not mean that photographs should not be taken or filming prohibited but there are certain protocols that must be followed to comply with data protection legislation as well as safeguarding children and young

people. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well being of children and young people.

Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose. However, it is perfectly acceptable to ask parents/carers to let the organisation know if they do NOT want their child photographed or filmed. The school will write to parents or carers to explain what is happening and leave the onus on the parent/ carer to contact them if they have any objections. In addition to this:

- It must be made clear why the image(s) or film is being used, what it will be used for and who might want to look at the pictures.
- When using photographs of children and young people, use group pictures and never identify them by name or other personal details. These details include e-mail or postal addresses, telephone or fax numbers.
- Obtain written and specific consent from parents or carers before using photographs on a website.
- Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.
- It is not appropriate for adults to take photographs of children for their personal use.

Form 5.25 for using images of children

5.26 Information Communications Technology (ICT)

Communication with Children and Young People (including the use of Technology)

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to children and young people including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers. E-mail or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet based web sites.

Internal e-mail systems should only be used in accordance with the organisation's policy.

ICT offer excellent resources and effective communication tools but there are unscrupulous individuals who use the technologies to gain access to exploit and even harm children, young people and vulnerable adults. Workers, parents and carers, children and young people all need to gain an understanding of ICT safety.

One of the down sides to the recent advances in internet technologies is the potential for inappropriate material to be made public. This can include sexually explicit images that have been

shared between young people where perhaps a relationship has ended and they have been posted on networking sites or sent to friends. Whatever the circumstances, young people need to be made aware of the consequences both of taking the images in the first place and the possible legal implications.

Please see Appendix 5.26 for further guidance

5.27 Abusive Images of Children and Internet Usage

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven.

Adults should not use equipment belonging to their organisation to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with children.

Adults should ensure that children and young people are not exposed to any inappropriate images or web links. Organisations and adults need to ensure that internet equipment used by children have the appropriate controls with regards to access. e.g. personal passwords should be kept confidential.

Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer (LADO) should be immediately informed. Adults should not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated which in itself can lead to a criminal prosecution.

CCPAS receives many calls from organisations dealing with those who have been charged or convicted of offences involving possession of abusive images of children. There are two specific offences. Under section 1(1) of the 1978 Protection of Children Act, it is an offence for a person to:

- take, or permit to be taken, or to make any indecent photograph or pseudo-photograph of a child
- distribute or show such indecent photographs or pseudo-photographs
- have in his/her possession such indecent photographs or pseudo-photographs, with a view to their being distributed or shown by himself/herself or others
- publish or cause to be published any advertisement likely to be understood as conveying that the advertiser distributes or shows such indecent photographs or pseudo-photographs, or intends to do so.
- Under section 160(1) of the Criminal Justice Act 1988, possessing an indecent photograph or pseudo- photograph of a child is a criminal offence.

5.28 Work Placements

Please see further guidance held by Mr M Cornell regarding work placements for students.

5.29 Equal Opportunities

Please see The King's School Equal Opportunities Policy in Appendix 5.29

5.30 Home Visits

There are workers for whom home visits are an integral part of their work. In these circumstances it is essential that appropriate policies and related risk assessments are in place to safeguard children and young people and the adults who work with them.

A risk assessment should include an evaluation of any known factors regarding the child/young person, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make adults more vulnerable to an allegation. Specific consideration should be given to visits outside of ‘office hours’ or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed. Where little or no information is available, visits should not be made alone. There will be occasions where risk assessments are not possible or not available, e.g. when emergency services are used. In these circumstances, a record must always be made of the circumstances and outcome of the home visit. Such records must always be available for scrutiny.

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a senior manager and the parents or carers and a clear justification for such arrangement is agreed and recorded.

Please see Appendix 5.30 for further guidance on home visits

Working in Partnership

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children, young people and vulnerable adults. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse. We therefore have clear guidelines in regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets CCPAS’ safeguarding standards.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and vulnerable adults and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

Clive Case, Principal

Dated: 18th October 2010

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