



## Guidance to ensure the Welfare of Boys at Eton College

It is a regulatory requirement that all Eton College Staff must **read and indicate that they have understood** this document which sets out our policy to ensure the welfare and safety of all boys at the school and other students enrolled on its courses. It is composed of three distinct sections:

1. Part 1 of the Government's Document Keeping Children Safe in Education (KCSIE May 2016)
2. The school's Safeguarding Policy
3. The school's Code of Conduct with specific regard to Safeguarding

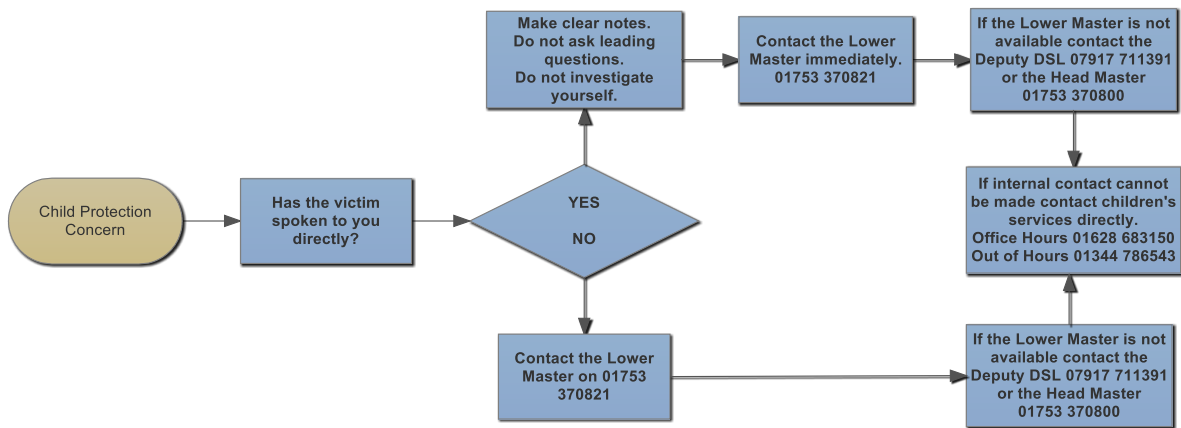
Throughout this document references are made to other policies and guidance documents. These may be accessed directly by clicking the hyperlink in the electronic version, which can be found on the Pastoral site on Firefly for those members of staff who have access to it. Your Head of Department will be able to help you if you do need such access in order to read a particular document.

This guidance gives very clear instructions upon what you should do if you hear or see anything that gives you concern that a boy at the school may be at risk of harm.

In such circumstances please contact the Designated Safeguarding Lead (Dr R. M. Stephenson the Lower Master). If he is not available, contact Mr David Gregg (07917 711391) as Deputy DSL or the Head Master's Office and ask to speak directly to the Head Master. If for some reason, contact fails and you are concerned that the boy is in immediate danger please contact Children's Services directly.

Lower Master	01753 370 821	<a href="mailto:r.stephenson@etoncollege.org.uk">r.stephenson@etoncollege.org.uk</a>
Mr. David Gregg	07917 711391	<a href="mailto:d.gregg@etoncollege.org.uk">d.gregg@etoncollege.org.uk</a>
Head Master's Office	01753 370 800	<a href="mailto:headmaster@etoncollege.org.uk">headmaster@etoncollege.org.uk</a>
Children's Services	01628 683150	08:45 to 17:15 Monday to Thursday 08:45 to 16:45 Friday
Out of Hours Children's Services Team	01344 786543	

Lower Master  
August 2016



*The normal procedure is to report any concerns (including concerns about extremism and radicalisation) to the Lower Master, or in his absence to Mr Gregg or the Head Master, but if necessary any person may make a referral directly to Children's Services*



Department  
for Education

# Keeping children safe in education

**Statutory guidance for schools and  
colleges**

**May 2016: For information only**

**Guidance will commence: 5 September 2016**

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## Summary

### What is the status of this guidance?

This is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise.

### About this guidance

This document contains information on what schools and colleges **should** do and sets out the legal duties with which schools and colleges **must** comply in order to keep children safe. It should be read alongside statutory guidance [Working together to safeguard children](#), and departmental advice [What to do if you are worried a child is being abused- Advice for practitioners](#).

Unless otherwise specified, 'school' means all schools whether maintained, non-maintained or independent schools, including academies and free schools, alternative provision academies, maintained nursery schools<sup>1</sup> and pupil referral units. 'College' means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992, and relates to their responsibilities towards children under the age of 18, but excludes 16-19 academies and free schools (which are required to comply with relevant safeguarding legislation by virtue of their funding agreement).

### Who this guidance is for

This statutory guidance should be read and followed by:

- governing bodies of maintained schools (including maintained nursery schools) and colleges;
- proprietors of independent schools (including academies, free schools), alternative provision academies and non-maintained special schools;<sup>2</sup> and

<sup>1</sup> The [Early Years Foundation Stage Framework](#) (EYFS) is mandatory for all early years providers. It applies to all schools that provide early years provision including maintained nursery schools. Maintained nursery schools, like the other schools listed under 'About this guidance', must have regard to Keeping Children Safe in Education 2016 when carrying out duties to safeguard and promote the welfare of children (by virtue of section 175(2) of the Education Act 2002 – see footnote 10 for further detail on this requirement).

<sup>2</sup> The proprietor will be the Academy Trust, where the Academy Trust has entered into a funding arrangement under the Academies Act 2010 concerning an independent school or alternative provision academy.

- management committees of pupil referral units (PRUs).

The above persons should ensure that **all staff** in their school or college **read** at least Part one of this guidance.

The above persons should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of this guidance.

### **What this guidance replaces**

This guidance replaces Keeping children safe in education July 2015.

A table of changes is included at Annex H.

# Part one: Safeguarding information for all staff

## What school and college staff should know and do

### A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance [Working together to safeguard children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

### The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All** school and college staff have a responsibility to provide a safe environment in which children can learn.
8. Each school and college should have a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
9. **All** school and college staff should be prepared to identify children who may benefit from early help.<sup>3</sup> Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage

<sup>3</sup> Detailed information on early help can be found in Chapter 1 of [Working together to safeguard children](#)

years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

10. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 21-27. Staff may be required to support social workers and other agencies following any referral.

11. The Teachers' Standards 2012 state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.<sup>4</sup>

### What school and college staff need to know

12. **All** staff members should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include:

- the child protection policy;
- the staff behaviour policy (sometimes called a code of conduct); and
- the role of the designated safeguarding lead.

Copies of policies and a copy of Part one of this document (Keeping children safe in education) should be provided to staff at induction.

13. **All** staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

14. **All** staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

15. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989<sup>5</sup> that may follow a referral, along with the role they might be expected to play in such assessments.<sup>6</sup>

<sup>4</sup> The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

<sup>5</sup> Under the Children Act 1989, local authorities are required to provide services for children in need in their area for the purposes of safeguarding and promoting their welfare. Local authorities undertake assessments of the needs of individual children to determine which services to provide and what action to take. This can include:



16. **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.

### What school and college staff should look out for

17. **All** school and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Types of abuse and neglect, and examples of safeguarding issues are described in paragraphs 35-44 of this guidance.

18. Departmental advice: [What to do if you are worried a child is being abused- Advice for practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on types of abuse and what to look out for.

19. Staff members working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.

20. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the designated safeguarding lead.

### What school and college staff should do if they have concerns about a child

21. If staff members have any **concerns** about a child (as opposed to a child being in immediate danger - see paragraph 28) they will need to decide what action to take. Where possible, there should be a conversation with the designated safeguarding lead to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board.

22. If anyone other than the designated safeguarding lead makes the referral they should inform the designated safeguarding lead, as soon as possible. The local authority should make a decision within one working day of a referral being made about what

Section 17- A child in need is defined under section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Section 47- If the local authority have reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm they have a duty to make enquires under section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

<sup>6</sup> Detailed information on statutory assessments can be found in Chapter 1 of [Working together to safeguard children](#)

course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool [Reporting child abuse to your local council](#) directs you to your local children's social care contact number.

23. See page 10 for a flow chart setting out the process for staff when they have concerns about a child.

24. If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

25. If early help is appropriate the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

26. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

27. If a **teacher**<sup>7</sup>, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police. See Annex A for further details.

### **What school and college staff should do if a child is in danger or at risk of harm**

28. **If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately.** Anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made. [Reporting child abuse to your local council](#) directs you to your local children's social care contact number.

### **Record keeping**

29. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

### **Why is all of this important?**

30. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly

<sup>7</sup> Section 5B(11) of the FGM Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) provides the definition for the term 'teacher': "teacher" means – (a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.<sup>8</sup>

### **What school and college staff should do if they have concerns about another staff member**

31. If staff members have concerns about another staff member then this should be referred to the headteacher or principal. Where there are concerns about the headteacher or principal this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school as appropriate. In the event of allegations of abuse being made against the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. Staff may consider discussing any concerns with the school's designated safeguarding lead and make any referral via them. Full details can be found in Part four of this guidance.

### **What school or college staff should do if they have concerns about safeguarding practices within the school or college**

32. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the senior leadership team.

33. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the school or college's senior leadership team.

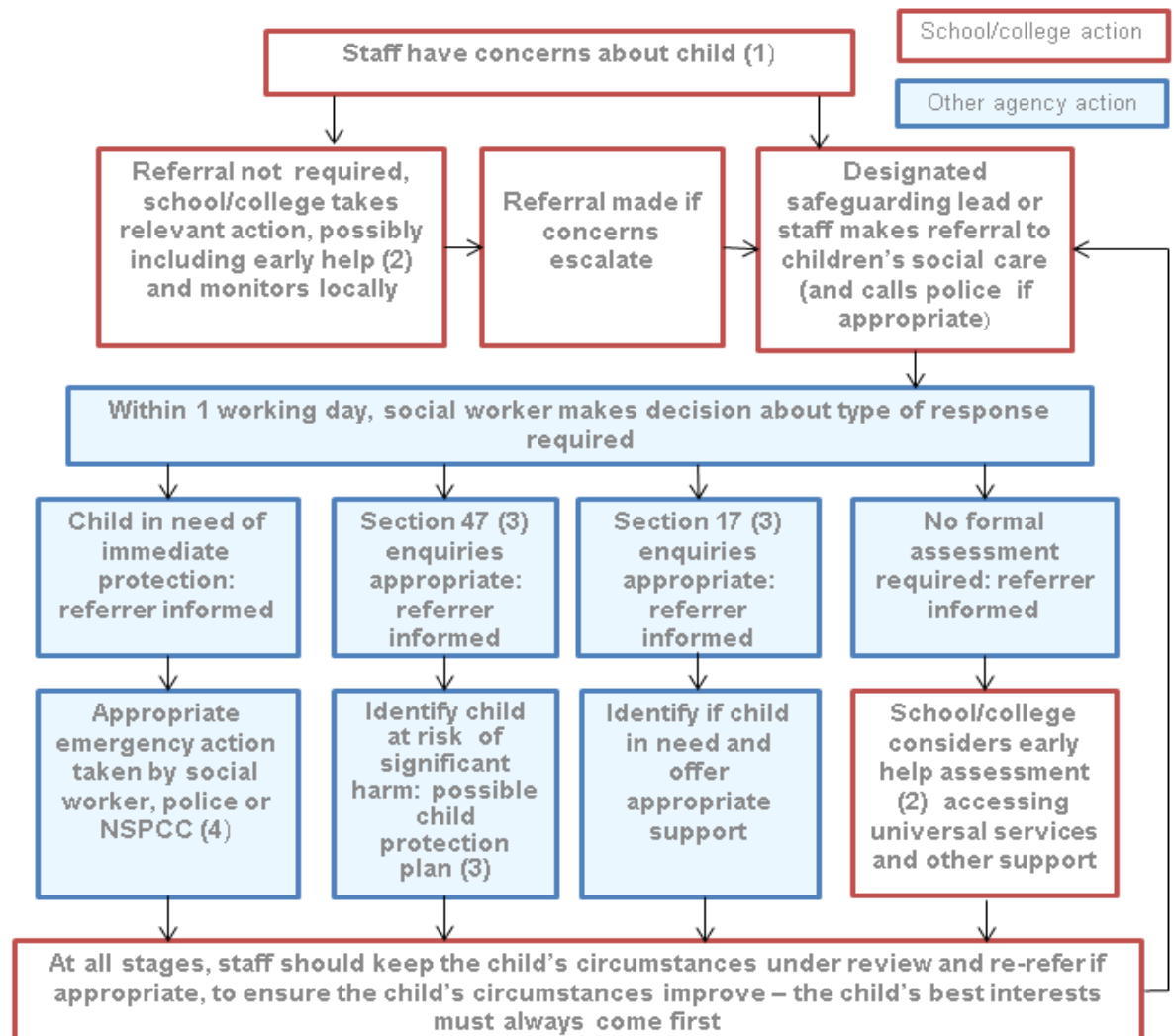
34. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at- [Advice on whistleblowing](#)
- The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).<sup>9</sup>

<sup>8</sup> [New learning from serious case reviews: a two year report for 2009-2011](#) (We will update with new evidence if it is available before September)

<sup>9</sup> Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

## Actions where there are concerns about a child



1. In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of [Working together to safeguard children](#).
4. This could include applying for an Emergency Protection Order (EPO).

## Types of abuse and neglect

35. **All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.**

36. **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 (e.g. via the internet). They may be abused by an adult or adults or another child or children.

37. **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.

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

39. **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, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

40. **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.

## Specific safeguarding issues

41. **All** staff should have an awareness of safeguarding issues- some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

42. **All** staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

43. 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](#), [MindEd](#) and the [NSPCC](#) websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- [bullying including cyberbullying](#)
- [children missing education](#) – and Annex A
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#) – and Annex A
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#) – and Annex A
- [forced marriage](#)- and Annex A
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)

- [hate](#)
- [mental health](#)
- [missing children and adults strategy](#)
- [private fostering](#)
- [preventing radicalisation](#) – and Annex A
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

44. Annex A contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff that work directly with children should read the annex.

## Annex A: Further information

### Further information on a child missing from education

**(The government recently consulted on plans to amend regulations from September 2016, to improve information sharing between schools and LAs to help identify children missing education and help protect children from potential harm. This section will be updated to reflect any changes that are made before September 5 2016.)**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

#### Schools

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.<sup>70</sup>

**All** schools must inform their local authority<sup>71</sup> of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor

<sup>70</sup> Regulation 4 of the Education (Pupil Registration) (England) Regulations 2006.

<sup>71</sup> Regulation 12(3) of the Education (Pupil Registration) (England) Regulations 2006.



his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;

- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when a school is to remove a pupil from its register for any of the five grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

**All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.<sup>72</sup>**

## Colleges

Where a college is providing education for a child of compulsory school age, the college shall work collaboratively with the appropriate local authority in order to share information about the attendance and/or absences of that child as the local authority deems necessary, as set out in departmental advice- [Enrolment of 14 to 16 year olds in full time further education](#). The college should also inform the relevant local authority immediately if that child is removed from roll so that the local authority can as part of their duty identify children of compulsory school age who are missing education.

## Further information on child sexual exploitation

**(We expect to update this section in the summer when a updated definition of CSE has been agreed)**

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

<sup>72</sup> In default of such agreement, at intervals determined by the Secretary of State.

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

## Further information on so-called ‘honour based’ violence

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 doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of [the Multi agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#).

### Actions

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>73</sup> that requires a different approach (see following section).

### FGM mandatory reporting duty

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.

<sup>73</sup>Section 5B(11) of the FGM Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) provides the definition for the term ‘teacher’: “teacher” means – (a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

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 to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at- [Mandatory reporting of female genital mutilation procedural information](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>74</sup> Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#)

## Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

## Further information on preventing radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools’ and colleges’ wider safeguarding duties, and is similar in nature to protecting children from

<sup>74</sup> Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they know that another teacher has already reported the case.

other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.<sup>75</sup> There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

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

## Prevent

From 1 July 2015 specified authorities, including all schools (and since 18 September 2015 all colleges) as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard"<sup>76</sup> to the need to prevent people from being drawn into terrorism".<sup>77</sup> This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the [Revised Prevent duty guidance: for England and Wales](#) are specifically concerned with schools (but also cover childcare). There is separate guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

The statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes:

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.

<sup>75</sup> Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

<sup>76</sup> According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

<sup>77</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The Department for Education has also published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. The Government has launched [educate against hate](#), a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

## Channel

School and college staff should understand when it is appropriate to make a referral to the Channel programme.<sup>78</sup> Channel guidance is available at: [Channel guidance](#). E-learning channel awareness programme for staff is available at: [Channel General Awareness](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

<sup>78</sup> Guidance issued under section 36(7) and section 38(6) of the CTSA 2015.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.<sup>79</sup>

<sup>79</sup> Such partners are required to have regard to guidance issued under section 38(6) of the CTSA 2015 when co-operating with the panel and police under section 38 of the CTSA 2015.

# ETON COLLEGE: Safeguarding Policy

## Statement of Policy

Eton College recognises its moral and statutory responsibility to safeguard and promote the welfare of all its pupils and other students enrolled on its courses. The school will endeavour to provide a safe and welcoming environment where children are respected and valued. All staff must be alert to the signs of abuse and maltreatment and will follow our procedures to ensure that children receive effective support, protection and justice. This policy applies to all staff and is consistent with those of the Local Safeguarding Children Board. The school places a very high priority upon maintaining effective procedures to safeguard the boys in its care. These procedures are outlined in detail in policies dealing with Health and Safety, Tackling Bullying, Tackling Extremism and Radicalisation, Behaviour, and Medical matters.

<http://firefly.etoncollege.org.uk/pastoral/policies>.

## Management of Safeguarding

### Governance Arrangements:

The Provost is nominated to act as the member of the governing body responsible for safeguarding. He meets regularly throughout the year with the Head Master, Designated Safeguarding Lead and the College's Clerk & Legal Advisor to appraise himself of all ongoing safeguarding matters and to ensure that the school's guidance and policies are consistent with regulatory requirements. The Provost also ensures that the DSL provides comprehensive reports to the full governing body on an annual basis. Detailed minutes of these meetings are taken.

### Designated Safeguarding Lead:

The Lower Master [Dr R.M. Stephenson 01753 370 821] is the designated senior member of staff who takes specific responsibility for child protection matters in the school. He has received specific training which is regularly updated every two years by the Local Safeguarding Children Board in multi-agency working; this training is to the highest level in order to be in a position to train other members of staff. Mr. David Gregg (07917 711391) has also received training and acts as deputy DSL.

The DSL is responsible for:

- Ensuring that all School staff understand the Child Protection procedures, as detailed by Berkshire Local Safeguarding Children Boards. Having a close working relationship with the Royal Borough of Windsor and Maidenhead Social Services Directorate Referral and Assessment Team <http://proceduresonline.com/berks>
- Facilitating inter-agency co-operation dealing with a child protection matter with the DSL taking the lead in the event of an incident.
- Ensuring the training all school staff (including the Provost, Fellows, The Head Master, teaching, support and part-time) on the contents of this guidance and on the procedures that the school should follow. This includes the training of all new staff as part of their induction after arrival at the school [see Child Protection references in the Employment Handbooks] and updating of all staff annually. All members of staff must attend the training lectures given by the Lower Master details of this initial training are available in the Child Protection Section of the Pastoral Website.



- Providing all members of staff (and volunteers) with Welfare guidance ( in electronic form or hard copy) which contains:
  1. A copy of Part 1 of Keeping Children Safe in Education (Department for Education May 2016).
  2. This Policy.
  3. The staff code of conduct with regard to Safeguarding.

In addition, ensuring that senior boys (House Captains and Members of the Eton Society) are formally trained in Safeguarding matters. All boys in the school will be made aware of the importance of reporting any concerns to the DSL following the procedures outlined below.

- Ensuring that the guidance outlined in Working Together to Safeguard Children (March 2015) and Keeping Children Safe in Education (May 2016) is followed particularly with respect to the recruitment/ appointment of staff.
- Overseeing the development of a sound curriculum policy, via the PSHE programme, that aims to promote the welfare and safeguarding of children. Create an environment within which children feel comfortable and know how to discuss such matters if it is necessary and that they are supported by robust anti-bullying, behaviour, and other pastoral policies and practice.
- Referring to (i) the Disclosure & Barring Service (DBS) and (ii) the National College for Teaching and Leadership any person whose services are no longer used by the school (for any reason connected to safeguarding) in the event the relevant referral criteria are met.
- Providing an annual written safeguarding report to be submitted both to the Standing Committee and one full meeting of the Provost and Fellows annually. This enables the Fellows to audit the effectiveness of the College’s safeguarding policies and procedures and to ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay. This is supplemented by regular safeguarding meetings (at least once per term) between the Provost (as safeguarding Governor), the Head Master, the Lower Master as DSL and the Clerk & Legal Advisor.
- Receiving reports of alleged or suspected child abuse including matters covered under the prevent strategy such as radicalisation and extremism within the school, or reported by a pupil relating to incidents at home or outside the school, contacting children’s social care including the Channel programme if there is a radicalisation concern and taking other action in response, as set out below.
- Ensuring that the procedures below are followed within the school and monitoring compliance with regulations.
- Monitoring the DBS checking process for all who come into contact with children at the College and the operation of the Single Central Register in association with Director of Human Resources.
- Providing a coordinated offer of early help when additional needs of boys are identified.
- Keeping all records relating to safeguarding reports made.

## Human Resources Department

The Human Resources Director is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (2016). This is done in accordance with the



school's Recruitment Policy. The HR Director will ensure that the recruitment checks of all employees are kept on the school's single central register.

Additionally, all individuals who work in regular contact with children, including volunteers and those employed by third parties, must be included on the single central register.

## Internal Procedures

The school follows specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual, and emotional abuse or neglect in accordance with Section 157 of the Education Act 2002. An important distinction is made here between children who may be at risk of harm (i.e. no actual evidence of harm having occurred but where there may be concerns) and children suffering harm (for which there is some evidence). However procedurally there is no difference in the early stages and the procedures outlined below should be followed carefully.

Any member of staff who is told of any incident or strong suspicion of physical, psychological or sexual child abuse including attempts to radicalise or coerce individuals to hold extreme political or religious views (see definitions in Appendix or refer to the Child Protection Section of the Pastoral Website, <http://firefly.etoncollege.org.uk/pastoral/child-protection> ) occurring in the school, outside the school linked to members of school staff and their families or to a pupil of the school at home or outside the school [or where he or she knows of or suspects such abuse], must report the information the same day to the DSL. In the absence of the Lower Master, the immediate report should be made to DMG as backup DSL or to the Head Master (01753 370 800). If the allegation concerns a member of staff the Lower Master should receive the initial report and the Head Master will be informed immediately. If the allegation or suspicion is about the Lower Master or Head Master, the report should be made to the Provost (01753 370 123) or directly to Children's Services (01628 683150) without informing the Head Master.

Child abuse to be reported includes abuse of a pupil by a staff member or other adult, abuse at home which a pupil reports to staff, abuse by a stranger outside the school, and abuse of one pupil by another pupil. In the case of abuse by a pupil, or group of pupils, the key issues identifying the problem as abuse (rather than an isolated instance of bullying or 'adolescent experimentation' which might be considered within normal bounds in the school community) are:

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

Pupils and support staff should be aware of the need to report allegations or suspicions of child abuse following the procedures outlined and are trained to do so.

Staff who are concerned about the behaviour of a colleague towards a pupil or pupils, are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise a colleague's career. They must remember that the welfare of the child is paramount.

When they report a concern of this nature they can expect:

- The concern to be taken seriously.

- Their identity to remain confidential (if this is their wish), unless they are required to act as a witness in court proceedings.
- To be protected as far as possible from victimisation or harassment.
- For an initial inquiry to take place to identify any action necessary.
- Children's social care and police to be involved if the concern relates to abuse or neglect or the commission of a crime.
- Written confirmation within the timescales given in the [whistle-blowing procedures](#) that their concern has been received and is being dealt with.
- To be notified in writing of the decision of the initial inquiry. The decision could be that no action is required, internal disciplinary procedures are initiated or referral to children's social care and/or police has been made.
- To be informed of the final outcome, subject to constraints of confidentiality and legal advice.

Any staff member to whom an allegation of physical, sexual, psychological abuse or neglect is made should act as follows:

- School staff [including the Lower Master and the Head Master] must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by school staff beyond the point at which it is clear that there is an allegation of abuse.
- Staff members, and other adults at the school, should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should however guarantee that they will pass on information only to the minimum number of people who must be told in order to ensure that the proper action is taken to sort the problem out, that they will never tell anyone who does not have a clear 'need to know', and that they will personally take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.
- Staff members should limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the pupil or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (Do not ask questions like "Did he do X to you?", using instead a minimum number of questions of the "Tell me what has happened" type).
- Always stop and listen straight away to someone who wants to talk about incidents or suspicion of abuse.
- Staff members should if possible make brief notes of what is said while they are speaking. These original notes are much more valuable than an improved version made later.
- However, under the provisions of the Education Regulations 2005 and the Data Protection Act this information is protected in a special category.
- Stop asking any more questions as soon as the pupil or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- Tell the informing pupil or adult that the staff member will now make sure that the appropriate people are brought in to follow the problem up (these will include the specialist social worker, and that worker may need to involve the police).
- Ask the informing pupil or adult what steps they would like taken to protect them now that they have made an allegation, and assure them that the school will try to follow their wishes.

- Refer the matter the same day, with all relevant details, to the Lower Master. If the matter involves a member of staff the Head Master will always be informed by the Lower Master at the same time.
- Make a written record as soon as possible of what they have been told, and make a copy of this available to the Lower Master who will consult with the Local Authority Designated Officer immediately.

## Action by the DSL

The Lower Master (as DSL) receiving an allegation of physical, sexual or psychological abuse should:

- Take any steps needed to protect any pupil involved from risk of immediate harm. [This may involve allocating an appropriate member of staff as far as possible a person chosen by the pupil himself to stay with him. Similarly, an inspector receiving an allegation of abuse at the school may stay with the pupil concerned until suitable arrangements for his protection are made.]
- Not interview or investigate the allegation further, but refer the matter the same day to the Social Services Directorate Assessment and Referral Team: [01628 683150 or out of hours 01344 786543]
- Consider advice given by Social Services Directorate (SSD) about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses direct. Agree with the SSD any necessary next steps in relation to:
  1. Informing a pupil's parents [there are circumstances where it would be inappropriate to inform parents immediately an allegation has been made].
  2. Medical examination or treatment for the pupil [again there are circumstances where medical evidence will be needed].
  3. Immediate protection that may be needed for a pupil who has been the victim of abuse, a pupil who has given information about abuse, and a pupil against whom an allegation has been made [each of these may now be at risk].
  4. Informing other people at the school [including any other members of staff] of the allegation and its investigation. [Experience has shown that knowledge of an allegation or impending investigation can lead to a serious risk to the informant from the alleged perpetrator, to 'covering up' of evidence that may be sought by police [such as collections of child pornographic photographs], or to pressure being applied on others to remain silent.]
- Inform the pupil or adult who made the initial allegation of what the next steps are to be, having agreed these with the Social Services Directorate.
- Inform the Head Master if this has not already happened [unless he is the subject of any of the allegations or suspicions] of the allegation and the action taken as above, and agree necessary further action in line with these standards.
- If necessary, suspend from duty, pending investigation, any staff member who is alleged to have abused a pupil or pupils. [Suspension should not be an automatic response to an allegation. The Head Master, or Provost in a case in which the Head Master is accused should consider carefully whether it is the appropriate course in each instance. Although suspension on full pay is a neutral act, it is bound to be distressing for the accused person and disruptive for the School. The Head Master along with the DSL will need to take into account the seriousness and plausibility of the allegation, the risk of harm to the pupil concerned or to

other pupils, and the possibilities of tampering with evidence, as well as the interests of the person concerned and the School].

- Take any necessary steps for the longer term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes fully into account [This may involve the pupil receiving continuing support and protection from a staff member chosen by him or changing boarding accommodation, or returning to his parents temporarily].
- Take any necessary steps to protect and support a pupil who is alleged to have abused another. [The allegation may not later be substantiated, but even if it is, the school continues to have a statutory welfare responsibility towards this pupil while he is boarding at the school].
- Ensure that any pupil being interviewed by the police has available a supportive member of staff of his own choice to accompany him if this becomes necessary.
- Notify the DBS of any allegation that is being investigated by the Police involving a member of the Teaching Staff particularly if the member of staff resigns or is dismissed or if their services are no longer used.
- Ensure co-operation by the school in any subsequent investigation by the SSD or the Police.
- Make arrangements, where feasible, for any pupil who has been the subject of abuse to receive any necessary continuing counselling and support, by agreement with his parents where appropriate.
- Consider taking, and as necessary should take, disciplinary action against any member of staff or agent to the school, where it believes pupils are at risk of abuse from that member of staff or agent to the school, even in cases where there is to be no criminal prosecution. [ It should be noted that the school must make its own decision as to whether pupils ' welfare is at risk, whatever the outcome of a police or SSD investigation may be and the level of evidence needed for criminal prosecution is likely to be higher than that which may trigger valid disciplinary proceedings. Disciplinary proceedings and grounds for concern over pupils 'welfare may be based on 'balance of probability' rather than 'beyond reasonable doubt'. The school must carry out its own Risk Assessment, which might include subjecting the member of staff to an independent forensic psychological assessment.]
- Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the Lower Master should discuss these with the Local Authority Designated Officer.
- Section 175 of the Education Act 2002 recommends that all records be kept until the child is 24 years old. The school will keep such records indefinitely.

### Whistle-blowing:

- If any member of staff has concerns that the school is not dealing with a child protection matter in accordance with its stated procedures, he or she may raise it under the College's Whistle-blowing Policy or directly with the NSPCC (whistle-blowing helpline 0800 028 0285).

## Children Missing:

- The school has a thorough attendance monitoring policy and clear procedures are in place for House staff to follow when children go missing. Attendance issues in a Boarding environment such as ours are not generally an issue. However, if there are concerns that a child does not appear on time at the end of leaves without clear explanation from parents or guardians or if there are concerns about the supervision of the child during the holidays or leaves these concerns should be raised with the DSL.

## Child sexual exploitation

- If a member of staff hears about or suspects that a boy, or his family, are involved in any such practices they must report it immediately to the DSL. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sexual favours are exchanged for gifts, to serious organised crimes by gangs. Much of this may take place on-line and may for example be a case where extreme pressure is put upon a child to perform sexual acts. 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 and sexual bullying.

## Honour Based Violence:

- This may include forced marriage and Female Genital Mutilation. Female Genital Mutilation comprises procedures involving partial or total removal of the external female genitalia or other injury to the female genitals. It is practiced by a number of cultures and is not linked to any particular religion. If any evidence of such practices within a family comes to light the member of staff made aware of it must report the matter to the DSL immediately. Further information may be found on the Child Protection section of the Pastoral Site on the internal web <http://firefly.etoncollege.org.uk/pastoral/child-protection>.

## Extremism and Radicalisation:

- Eton College is fully committed to safeguarding and promoting the welfare of all its pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. The Tackling Extremism and Radicalisation Policy sets out our beliefs, strategies and procedures to protect vulnerable individuals from being radicalised or exposed to extremist views, by identifying who they are and promptly providing them with support. This policy can be found at <http://firefly.etoncollege.org.uk/pastoral/policies>. It should be read in conjunction with other policies in particular:

### [Staff Code of Conduct](#)

[Equality Policy](#)

[Prevention of Bullying and Unkindness](#)

[Behaviour](#)

[Acceptable Use Agreement \(Boys\)](#)

[Computer Acceptable Use Policy \(Adults\)](#)

- Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.
- Extremism is defined as the holding of extreme political or religious views. Further information may be found on the internal website at:  
<http://firefly.etoncollege.org.uk/pastoral/child-protection>.
- If any member of the school community (member of staff, Provost & Fellows, boy or parent) has any concern about radicalisation relating to a pupil or member of staff, a referral should be made immediately to the DSL (Designated Safeguarding Lead) the Lower Master.

### On-Line Safety:

- It is clear that many of the issues described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur on-line. The School ensures that the school network is appropriately filtered and boys and staff are guided in acceptable use of our network and the internet in general. Boys are required to sign an acceptable use agreement and given careful guidance on keeping safe on-line through computer technology lessons, specific lectures and our PSHE course. This policy should be read in conjunction with:

[Staff Code of Conduct](#)

[Prevention of Bullying and Unkindness](#)

[Behaviour](#)

[Acceptable Use Agreement \(Boys\)](#)

[Computer Acceptable Use Policy \(Adults\)](#)

- Any evidence that a boy may be at risk on-line or indeed being harmed on-line should be brought to the attention of the DSL and it will be dealt with as a child protection matter.

# Eton College School Policy:

## Code of Conduct with respect to Safeguarding

### Introduction

A relationship between an adult and a child or young person is not a relationship between equals. As a result of their knowledge, position and/or the authority invested in their role, all adults working in education settings are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

This policy should be read as guidance for all working at Eton College regardless of their position or specific department.

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff. Good practice must include:

- Treating all boys with respect.
- Setting the highest standards of personal conduct.
- Involving boys in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among boys at all times.
- Being prepared to listen.
- Being alert to changes in boys' behaviour which may indicate that they are having problems.
- Reading and understanding the school's child protection policy and other policies relating to the welfare of boys. These policies may be found at:  
<https://firefly.etoncollege.org.uk/pastoral/policies>
- Asking the boy's permission before initiating physical contact, such as assisting with dressing, physical support during PE, music or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between boys and avoiding the use of sexualised or derogatory language.
- Applying the use of reasonable force only as a last resort and in compliance with school policy.
- Referring all concerns about a boy's safety and welfare to the Lower Master.

### Maintaining Professional Boundaries

- All adults should clearly understand the need to maintain appropriate boundaries in their contacts with boys. Adults should always maintain appropriate professional boundaries and

avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

- Inevitably Masters and other staff will need, on occasions to have one to one contact with boys. In these circumstances ensure that the setting is appropriate and that the situation cannot be misinterpreted. For example if a member of staff intends to see a boy in his/ her own home and perhaps give him tea it would be prudent to ensure that the boy's House Master is aware. Similarly offering a lift to a boy in your car is acceptable for school business, for example a trip to the outpatients' clinic but not for less formal purposes.
- However in general terms we must maintain professional boundaries by:
  - Not engaging in gossip about other members of staff or other boys.
  - Not allowing a relaxed atmosphere outside of the schoolroom to develop into an unprofessional informality.
  - Sticking to the rules regarding alcohol and the entertainment of boys.

## Communication with Boys (including the use of electronic technology)

- Most of our new staff are of an age whereby they have grown up with new and emerging technologies. The use of smart phones means that access to the internet and social networking sites is available whenever and wherever we are.
- The Acceptable use policies (AUP) for staff should be consulted:

<https://firefly.etoncollege.org.uk/it-department/it-policies>

- Many boys will search to see if staff have a social networking account such as Facebook and may attempt to contact them through this. Staff need to use their professional judgement in dealing with such contacts and where necessary explain to the boy that they will not respond to friend requests from them as they are adults in a professional position not their friend. Where boys do attempt to make contact through social networking sites staff should bring the matter to the attention of their line manager.
- Eton staff use new technologies on a daily basis to support and enhance the curriculum and use internal email systems to communicate with boys and their parents. However, new technologies should never be used to start or encourage a friendship or relationship with a boy and communication should never fall into a loose informality.
- Adults should not as a general rule share any personal information with a boy unless it is absolutely necessary.
- They should not request, or respond to, any personal information from the boy, 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 careful in their communications with boys 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 (other than those published as official school contacts) to pupils including email, home or mobile telephone numbers, unless the need to do so is agreed with senior management. For example this might be necessary for a School expedition.
- E-mail or text communications between an adult and a boy outside agreed protocols may lead to disciplinary and/or criminal investigations.
- They should ensure that personal social networking sites are set at private and that boys are never listed as approved contacts.



## The use of personal living space

- Staff should not work with boys in their own home or living space unless the reason for this has been established with the Head Master (for example Private Business). In all other cases, particularly entertainment of groups or individual support the House Master of the boy or boys concerned should be made fully aware.
- Under no circumstances should boys assist with chores or tasks on a routine basis in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.
- The rules pertaining to Boarding Houses are quite specific and all staff living within them should abide scrupulously to these rules regarding behaviour on the boys' side and the exclusion of boys from the staff quarters. Similarly, the rules regarding visitors (see Visitor Policy) and the contents of the Residents' letter issued by the HR department should be followed without exception.

## Favouritism

- Staff should exercise care when selecting boys for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when boys are excluded from an activity. Methods of selection and exclusion should always be subject to clear, agreed criteria.
- Whilst the paragraph above puts emphasis on avoiding favouritism, it is equally important to acknowledge that exclusion from activity can be used as a form of humiliation and abuse.

## Gifts and rewards

- Eton has a clear policy on the regarding the receipt of gifts and rewards and this should be followed very carefully: [Anti-Corruption Policy](#)
- The giving of gifts or rewards to boys should be part of an agreed policy for supporting positive behaviour or recognising particular achievements for example prizes. In some situations, the giving of gifts as rewards may be accepted practice for a group of students for example a small reward from the House Master for receiving a certain number of show-ups per half, whilst in other situations the giving of a gift to an individual boy will be part of an agreed plan, recorded and discussed with senior management.
- The guidance does acknowledge that there may be specific occasions when a member of staff may consider it appropriate to give a boy a small personal gift of insignificant value but this should only happen with the agreement of the line manager.
- If gifts are given it should be done openly and not based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person.
- The receiving of gifts is also an issue to be addressed and staff must not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment (see the policy above). It is fashionable now for parents to buy 'thank you' cards and gifts for members of staff at the end of the academic year and it is recognised that they could cause offence by not accepting them.

## Social Contact

- Adults should not establish or seek to establish social contact with boys for the purpose of securing a friendship or to pursue or strengthen a relationship. If a boy or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise

his/her professional judgement in making a response and ensure that the House Master is aware. There will be occasions when there are social contacts between boys and staff, where for example the parent and member of staff are part of the same social circle. These contacts however, will be easily recognised and openly acknowledged.

## Infatuation

- Occasionally, a boy may develop an infatuation with an adult member of staff. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach and that they keep the boy's House Master and the Lower Master fully informed.

## Grooming

- All staff should be aware that a person intent on sexual abuse of children will groom children and the adults around them to ensure that they can carry out their abusive behaviour and to ensure that they do not raise anybody's suspicion or that they make other people scared to blow the whistle.
- Some of the behaviours described above have been employed by sex offenders to cover up or to explain away their behaviour. It is important that staff do not behave in a way that could be misinterpreted, leaving themselves open to suspicion.

## The Legal Position

- All school staff are aware that inappropriate behaviour towards boys is unacceptable and that their conduct towards boys must be beyond reproach. Breaches of this code may well result in serious disciplinary action and may fall into the category of gross misconduct resulting in dismissal.
- In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a boy under 18 may be a criminal offence, even if that boy is over the age of consent. Staff need to properly understand the law. This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust. This means that whether the young person consented is not the issue that determines whether the offence is committed and even if it is shown that a young person did consent to the relationship this does not detract from the seriousness of the offence.
- The legal definition of a child is a person under the age of 18 and all staff must be aware of this. If convicted of this offence a person is likely to serve a custodial sentence and have their name added to the sex offender register.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts, it may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. This description of sexual activity includes the sending of explicit sexual images, emails and texts.