

## Child Protection and Safeguarding Policy

Reviewed: July 2023

Next Review: July 2024

Author: Designated Safeguarding Lead (DSL)

Approved: This policy is reviewed annually by the Warden & Fellows

*The DSL has authority to update the policy (to reflect changes in Guidance and Legislation) with approval from the SMC but without prior approval from the Governing Body.*

Child Protection at Winchester College must comply with the safeguarding requirements as given in:

- DfE document *Keeping Children Safe in Education* September 2023
- DfE guidance *Meeting digital and technology standards in schools and colleges* March 2023
- *Working Together to Safeguard Children* July 2018,
- *National Minimum Standards for Boarding Schools* September 2022,
- *Health and Safety Advice on Legal Duties and Powers for Local Authorities, Head Teachers, Staff and Governing Bodies* February 2014,
- *What to do if you're worried a child is being abused* March 2015,
- *The Abuse of Positions of Trust* legislation in the *Sexual Offences Act* 2003,
- *The Prevent Duty* June 2015,
- *Use of Reasonable Force* July 2013
- and advice from the Department for Education and the Local Safeguarding Children's Board in the document *Preventing and Tackling Bullying* July 2017.

**The School follows the locally-agreed inter-agency procedures of Hampshire County Council Children's Services.** This policy is intended to clarify how those standards are to be met by the School. It will be reviewed annually to ensure that it complies with current legislation and the review will include an update and review of the effectiveness of safeguarding procedures and their implementation.

### Important contacts:

1. Designated Safeguarding Lead (DSL): **Mrs Ali Harber**  
Deputy Designated Safeguarding Leads: **Mr Callum Barnes (Director of Safeguarding), Mr Iain Smith, Mr Simon Mildinhall, Mrs Belén Lopez & Mr Jack Fisher**  
01962 621179 (Office Hours) 07436 588321 (Out of Hours) [safeguarding@wincoll.ac.uk](mailto:safeguarding@wincoll.ac.uk)
2. Governor with specific responsibility for Child Protection: **Mrs Alison Mayne** via her secretary  
01962 621206, [jm1@wincoll.ac.uk](mailto:jm1@wincoll.ac.uk)
3. Winchester College Medical Centre: 01962 621228
4. Local Authority Designated Officer (LADO): 01962 876364
5. Porters' Lodge: 01962 621227. Porters' mobile (2300 to 0730): 07850 341682

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### **Key:**

BSA: Boarding Schools Association

DBS: Disclosure and Barring Service

DfE: Department for Education

DSL: Designated Safeguarding Lead

ISI: Independent Schools Inspectorate

KCSIE: Keeping Children Safe in Education

LADO: Local Authority Designated Officer

HSCP: Hampshire Safeguarding Children Partnership

MASH: Multi Agency Safeguarding Hub

TRA: Teaching Regulation Agency

PSHEE: Personal Social Health and Economic Education

## 1.0 Overview

Adults looking after children or young people must be aware of the risk of abuse by adults or other young people. Child abuse can occur in all walks of life and Winchester College should not be considered in some way immune. Pupils have the right to be safeguarded from harm and exploitation regardless of race, religion, ethnicity, age, gender, sexual orientation or disability.

*See Appendix 1 for the Code of Professional Conduct for Staff*

- Winchester College is dedicated to safeguarding and promoting the welfare of its boarding and day pupils, regardless of age, ability, race, culture, religion, sexual orientation, gender or class.
- It is the duty of all members of staff, teaching and non-teaching, to play an active role in ensuring the safety and promoting the welfare of the children in the School's care as children in residential settings can be particularly vulnerable. Staff should exercise professional curiosity if they have concerns about a child and they should speak to the Designated Safeguarding Lead, or a Deputy DSL, about those concerns.
- The DSL has the lead responsibility for safeguarding and online safety (including for monitoring and filtering) and works closely with IT staff to ensure that the needs of the school are met and that staff are appropriately trained. IT staff must ensure that internet access and electronic communication is as safe as possible and that appropriate monitoring and filtering systems are in place to protect children from accessing harmful content online.
- All staff are expected to be aware of and follow the child protection and safeguarding procedures. In particular they need to read Keeping Children Safe in Education Part 1 and Annex B, (or Annex A only if not working directly with children) (Appendix 14) and this policy, as it outlines their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse and issues about confidentiality.
- All staff are issued with guidelines and undergo training as outlined in Appendix 11. Sixth Book pupils also receive guidelines on child protection and safeguarding procedures as part of their house prefect induction.
- We provide a structured Personal, Social, Health and Economic Education (PSHEE) programme within the curriculum Tutorial Time which aims at developing personal and inter-personal skills and deals specifically with safeguarding issues, Relationships and Sex Education (RSE), e-safety and resilience to risks of radicalisation. This is overseen by the Head of PSHEE, Mr Simon Mildinhal.
- There are protocols to ensure that all visitors are appropriately checked and supervised. There are specific requirements for Visiting Speakers to ensure that the content of their presentation is appropriate for pupils. See Appendix 12 for details.
- The school site is used by various outside organisation during the school holidays. These bookings and their arrangements are overseen by the Enterprises office which liaises with the Safeguarding team over implementing the relevant policies and procedures. Should the school become aware of safeguarding allegations relating to an incident that has happened during the time an outside organisation has been using the school site for the purposes of running activities for children, the school will manage this in line with this Safeguarding and Child Protection policy. As part of this, the school will refer allegations to the Hampshire LADO (their contact details can be found later in the policy) where required.
- Public tours are undertaken but are always accompanied and take place at confirmed times.
- School employees do not investigate serious allegations of child abuse themselves. All allegations will be reported to Children and Young People's Services (Hampshire Children's Services)

immediately. When a serious allegation is made against an employee, the School will report it to the Local Authority Designated Officer (LADO). The LADO provides advice and presides over the investigation of any allegation or suspicion of abuse directed against any school employee. They will advise whether or not it is necessary to inform the Secretary of State for Education at the Department for Education, even if the School no longer employs the person in question.

- **Safeguarding and promoting the welfare of children is the responsibility of all employees** and anyone can make a referral to the Children and Young People's Service (Hampshire Children's Services), as outlined in Section 2.4.
- Concerns regarding Quiristers should be referred to Mr Thomas Rainer, DSL of The Pilgrims' School, on 01962 854189.

Under the Governing Body's authority, the following persons have specific responsibility for Child Protection matters at the School:

**Ms Elizabeth Stone** (Headmaster)

**Mrs A Harber** (Deputy Head Pastoral & Designated Safeguarding Lead)

**Mr I Smith** (Second Master & Deputy Designated Safeguarding Lead)

**Mr C P Barnes** (Director of Safeguarding & Deputy Designated Safeguarding Lead)

**Mrs M B Lopez** (Deputy Designated Safeguarding Lead)

**Mr S Mildinhall** (Surmaster Pastoral & Deputy Designated Safeguarding Lead)

**Mr J Fisher** (Deputy Designated Safeguarding Lead)

**Mrs A Mayne** (Safeguarding Fellow, Governing Body)

*See Appendix 2 for a description of their roles and Appendix 3 for their contact details.*

## **2.0 Concerns about a Child**

### **2.1 Definitions**

Safeguarding is everyone's responsibility. It involves protecting children from maltreatment, preventing impairment of children's health and 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. Children includes everyone under the age of 18.

Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child may be abused by an adult or adults or another child or children known to them, or more rarely, by others (e.g. online). Children can be at risk of harm inside and outside of School, inside and outside of home as well as online. Child Protection involves identifying and managing specific pupils who are at risk of significant harm due to:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Technology can be a significant contributor to abuse. Children can be abused online including by other children as well as by adults. This can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

- **Physical Abuse:** deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Physical harm may also be caused when an adult fabricates the symptoms of, or deliberately induces, illness in a child.
- **Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.
- **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Neglect:** Neglect is the ongoing failure to meet a child's basic needs. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents.
- **Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE):** are forms of child abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator(s) or facilitator (e.g. transporting drugs/money). The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (e.g.: forcing children to look at sexual images or watch sexual activities).
- **Exposure to Extremism:** Under section 26 of the Counter-Terrorism and Security Act 2015 Winchester College has "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty. The School builds pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, the School is committed to providing a safe space in which pupils can debate controversial issues related to religion, culture, history, politics and civic responsibility. This discussion will allow them to understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- **Exposure to Manipulation, Indoctrination and Exploitation**  
Manipulation, indoctrination and exploitation (whether verbal, psychological or physical) refer to the strategies whereby an individual (child or adult) may be encouraged or coerced into unsafe behaviours or allegiances. Winchester College builds pupils' resilience to manipulation,

indoctrination and exploitation by promoting fundamental British values and making clear in lessons and in policies what is acceptable and not acceptable behaviour. The School's Code, Rules and Principles of Boarding require all individuals (regardless of race, religion, ethnicity, age, gender, sexual orientation or disability) are treated equally and with respect, free from abuse, teasing, harassment, bullying, discriminatory language or any other kind of anti-social behaviour. Discussions around these matters enable pupils to understand the risks associated with potential manipulation, indoctrination and exploitation and allow them to resist such strategies.'

- **Female Genital Mutilation:** Female Genital Mutilation (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. It is important that you are aware that reporting of incidents of FGM are mandatory.
- **Other:** domestic abuse (which may be psychological, physical, sexual, financial or emotional and includes witnessing the ill-treatment of others), Honour based abuse (such as FGM), Forced Marriage, bullying (including cyber bullying), drugs, induced illness, youth violence, faith abuse, youth produced sexual imagery (sexting), serious violence/gangs (including that linked to county lines), radicalisation, children missing education (Appendix 5), children absent from education for prolonged periods of time, teenage relationship abuse (which may also include domestic abuse). For further information, visit the NSPCC website.

**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.**

*Details about specific forms of abuse can be found in Keeping Children Safe in Education, Annex B.*

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school or college. All staff, but especially the Designated Safeguarding Lead (or Deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as contextual safeguarding. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## **2.2 Indicators of abuse or neglect**

The following is advice from the document *What to do if you're worried a child is being abused*, 2015. Some of the following signs might be indicators of abuse or neglect:

- Pupils whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping;
- Pupils with consistently poor hygiene;
- Pupils who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Pupils who don't want to change clothes in front of others or participate in physical activities;
- Pupils who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;

- Pupils who talk about being left home alone, with inappropriate carers or with strangers;
- Pupils who do not reach developmental milestones;
- Pupils who are reluctant to go home during school breaks;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Pupils who drink alcohol regularly from an early age;
- Pupils who are concerned for younger siblings without explaining why;
- Pupils who talk about running away; and
- Pupils who shy away from being touched or flinch at sudden movements.

### **2.23 Indicators of greater risk of harm**

- Children who need a social worker
- Children missing from education
- Children absent from education for prolonged periods of time and /or for repeat occasions
- Where a parent/carer has expressed their intention to remove a child from school with a view to educating them at home
- Children requiring mental health support
- Looked after and previously looked after children
- Children with special educational needs and disabilities or health issues
- Children who are LGBTQIA+

### **2.3 Receiving a disclosure**

If you suspect abuse, a young person confides in you, or a complaint is made to you about any adult or about yourself, it is your duty to report the concern to the Designated Safeguarding Lead. If a young person tells you about abuse by someone else:

1. Always stop and listen straightaway. Ask open-ended, rather than leading, questions such as 'What happened?' and 'Who was involved?'
2. Be patient as it may take some time for a young person to explain a situation to you. Don't give the impression that you don't believe them or that they are creating a problem by reporting abuse. A young person is not always ready or able to talk about their experiences and/or they may not always recognise that they are being abused.
3. Offer reassurance that you will take what they have told you seriously.
4. Write brief notes outlining the conversation either during or immediately after the disclosure. It is important that you try to record the pupil's words objectively and without judgement. Sign and date your notes.
5. Do not guarantee confidentiality. Explain that you will have to report the matter to Designated Safeguarding Lead so that they can offer help and guidance.
6. Report the matter to the DSL and give them a copy of your signed notes.
7. The DSL will inform you if you have any further obligations.

Child abuse to be reported includes abuse of a pupil by an employee 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 (child on child abuse) including online.

In the case of abuse by a pupil, or group of pupils, the key issue is identifying the problem as abuse (rather than an isolated instance of bullying or 'adolescent experimentation' or 'banter'). If an incident is considered abuse rather than bullying it is because:

- of the frequency, nature and severity of the incident(s);
- of the ages and relative ages of the children involved;
- the victim was coerced by physical force/fear or by a pupil or group of pupils significantly older than them, or having power or authority over them;
- 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;
- the bullying involves a specific serious incident, such as a serious physical or sexual assault or it might persist despite attempts to intervene.

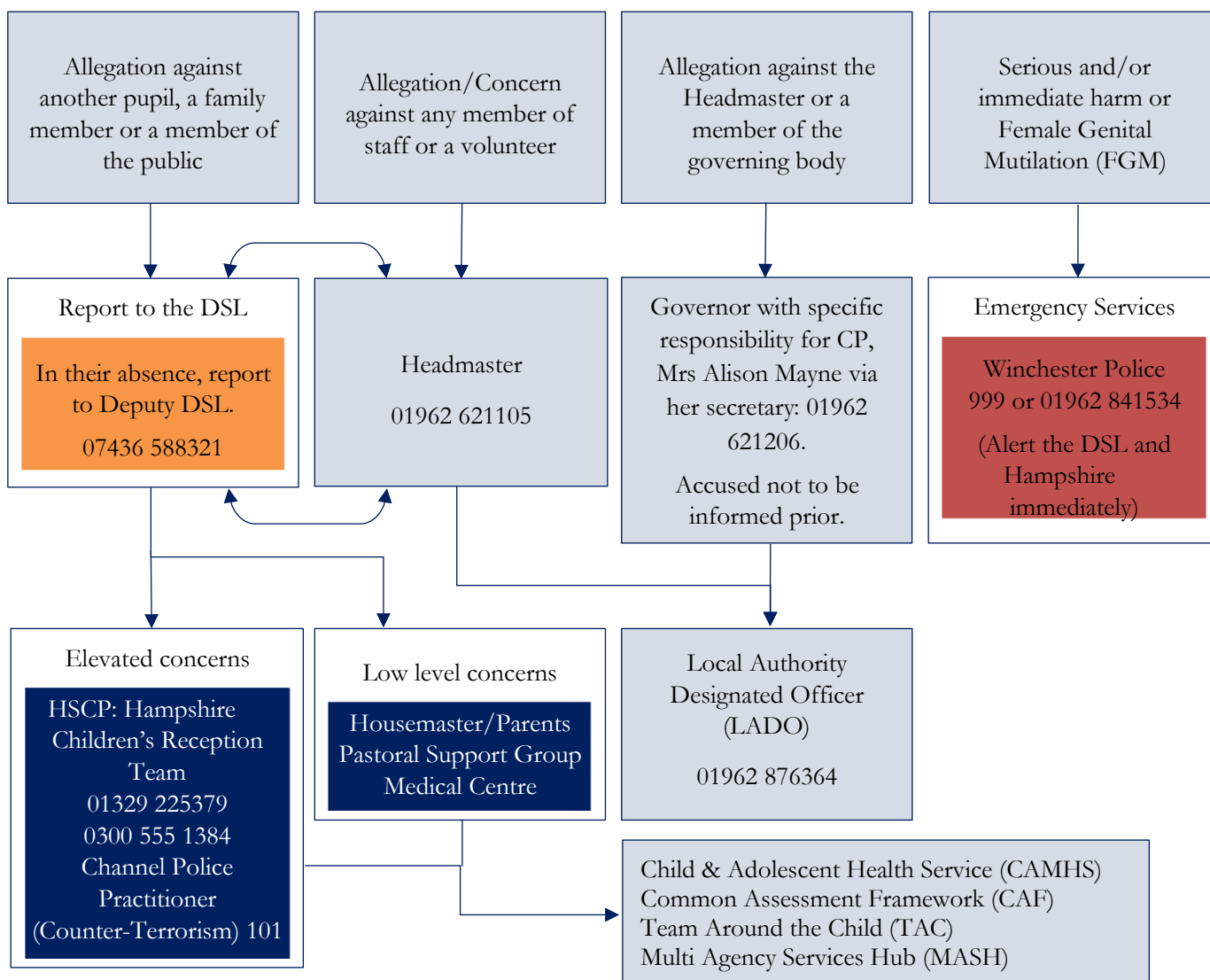
Abuse will be reported to the Designated Safeguarding Lead who will contact Hampshire Children's Services (Tel: 0300 555 1384) for guidance.

### **2.3 To whom do you report?**

Any employee who knows of, is told of, or strongly suspects, that a pupil is at significant risk of harm either in the School, at home or outside the School, they must report the information immediately to the **Designated Safeguarding Lead** (Mrs Ali Harber, [safeguarding@wincoll.ac.uk](mailto:safeguarding@wincoll.ac.uk), Tel: 07436 588321/01962 621179) who will then refer the matter to the appropriate person as illustrated below. In the absence of the Designated Safeguarding Lead, the immediate report should be made to a **Deputy Designated Safeguarding Lead**.

When concerned about the welfare of a child, employees **should always act in the best interests of the child**. Notwithstanding the procedures below, anyone may make a referral to external agencies if necessary. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible.





**Reports should be made verbally or in person if possible. Please do not rely on leaving a message.**

*See Appendix 3 for other useful contacts.*

## 2.4 Early Help

Depending on the nature of the concern, support may be managed internally with the cooperation of the Pastoral Support Group or an early help assessment may be conducted.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years (Working Together to Safeguard Children, 2018). In the first instance, staff should discuss early help requirements with the DSL, who will coordinate any referral. Staff may be required to support other agencies and professionals in an early help assessment.

**All staff should be alert to the potential need of early help for a pupil who:**

- is disabled and has specific additional needs; has special educational needs;
- has mental health needs
- is a young carer;

- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care/school or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation, Forced Marriage, or honour-based abuse;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited
- is a privately fostered child
- is looked after and previously looked after child
- is persistently absent from education including for prolonged periods of time and/or on repeat occasions
- is engaging in consensual and non-consensual sharing of nude and semi-nude images and/or videos

Schools are often best placed to identify those in need of early help (Appendix 13). An Inter-agency assessment such as The Common Assessment Framework (CAF) may provide the best way of assessing the needs of pupils and their families where a range of agencies will be required. Team Around the Family (TAF) and Team Around the Child (TAC) are more specific assessment groups. Assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989

*Further details can be found in Working Together to Safeguard Children, 2018.*

## **2.5 Additional Support (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. When the school is informed of a social worker's involvement, the Designated Safeguarding Lead will hold and use this information so that decisions can be made in the best interest of the child's safety, welfare and educational outcomes.

## **2.6 Mental Health Support and Referrals**

Mental health referrals will be made to the Medical Centre. Medical staff may then refer the pupil to a specialist for support. The school uses its own Mental Healthcare Pathway procedure, the Pastoral Support Groups and DfE 'Mental health and behaviour in schools' guidance to signpost appropriate support. The referral processes are laid out below as well as the support that the College provides to all pupils for their mental wellbeing.

The referral process is straightforward; there are two supporting documents which are relevant for all staff in understanding the process which are pasted below. The first explains the process by way of a flow chart and the second explains the differing roles played by the wider pastoral support network outside of the boarding house.

Pastoral concerns may be raised by any colleague - a member of support staff is just as likely to be in a position to raise a concern as a don. Usually this concern will be raised in the first instance with the pupil's housemaster or matron, unless it is a safeguarding matter, in which case it goes to the DSL or one of the Deputy DSLs. The housemaster or matron may wish to raise the issue with the Medical Centre.

This might be encouraging a pupil to attend one of the Tuesday or Thursday afternoon drop-in sessions. Or it might be through a medical appointment with one of the paediatric nurses, who may make a referral to the GP. The GP may then make a referral to one of the school's Child and Adolescent Psychiatrists (Dr Young or Dr White), or the school Child and Adolescent Psychologist, Dr Rudkin.

Not all referrals are medical, but the Medical Centre is the principal focus of pastoral care outside the boarding house. The school counselling service operates at the Medical Centre, and any pupil can either self-refer to the School Counsellor, or be referred by matron, housemaster, nurse or GP. We don't necessarily know if a pupil is seeing the counsellor if they have self-referred. However, the Lead Pupil Counsellor attends the weekly meetings of the Pastoral Support Group, and passes on any concerns raised by her or her team then.

**How do you know there is a mental health concern?**

The pupil told you?

Other pupils or staff have voiced their concerns?

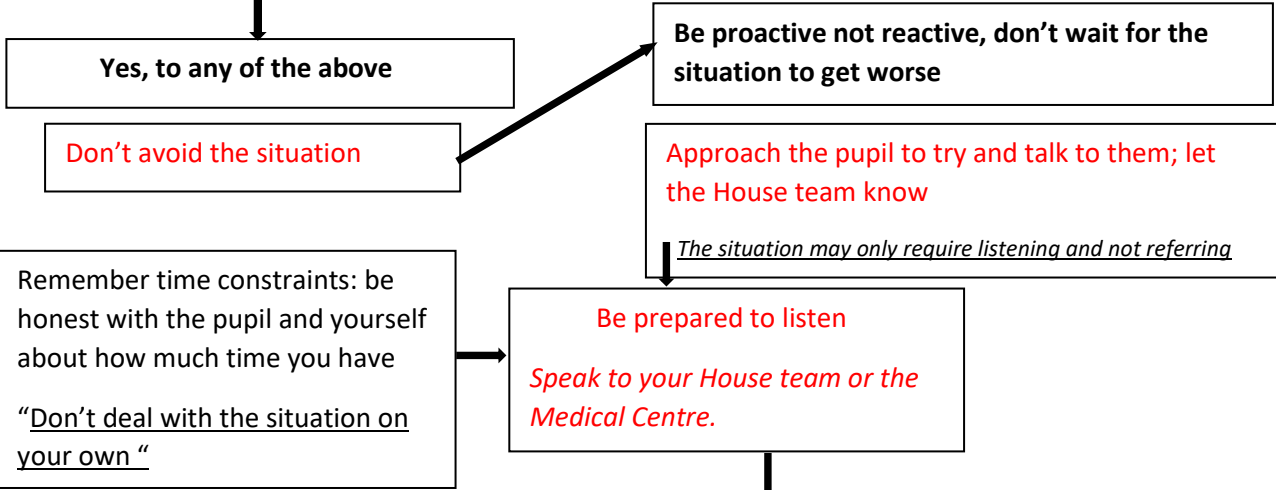
You have noticed significant changes in the pupil's appearance-hygiene/weight gain/loss?

You have noticed changes in the pupil's mood withdrawn/miserable/hyperactive/sad?

You have noticed significant changes in the pupil's behaviour?

The pupil's academic performance has changed dramatically?

The pupil has been experiencing these problems for a significant amount of time



**If you feel there is a concern please speak to the Medical Centre who will support and give advice to you or the pupil. We are here 24 hours a day on ext 228.**

<p><b>School Boarding Team</b></p> <p>Housemaster/ Matron /Tutor</p> <p>DSL and DDSLs</p> <p>2M/HM</p>	<p><b>Medical Centre Team</b></p> <p>Lead Nurse</p> <p>Experienced Paediatric Nurses/Adult Nurses</p> <p><i>All the team have valuable experience caring for young people in hospital /community /school /residential settings.</i></p> <p>School GP: Dr Laura Francis</p> <p>Private Healthcare</p>	<p><b>School Counselling Team</b></p> <p>Lead Counsellor</p> <p>Counselling Team</p> <p>Independent Listeners</p>	<p><b>Private Child and Adolescent Psychiatrists</b></p> <p>Dr Ollie White</p> <p>Dr Bill Young</p> <p><i>Pupils referred by school GP</i></p> <p><b>Private Clinical Psychologist</b></p> <p>Dr Angharad Rudkin</p>
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### **Medical Centre**

A team of experienced Healthcare professionals with over 20 years of experience working and supporting young people in mental health within hospital, community, school and residential settings.

Supported by the GPs in St Paul's Surgery

Pupils can be referred by the school staff or self-refer

If the nurse feels the pupil could do with more time and extra support they may refer to the Drop-in service.

The nurse may feel they need further assessment with the school GP

The nurse may refer to the lead counsellor directly if the pupil is known to the counselling service or if appropriate.

### **GP Service supported by St Paul's**

School Doctors Dr Laura Francis

Pupils can: be referred by the Medical Centre, self-refer, be referred by counselling team, be referred by house staff and/or parents

GPs can refer to the NHS CAMHS team if more specialist input is needed

Regular GP weekly appointments with pupils on regular medication to monitor side effects and dosages.

### **Drop in Service**

Run by the Lead Nurse.

Designed to support all pupils with physical health, emotional health and well-being, sexual health and relationships.

Delivers health advice signposting and referrals to the counselling team

This happens twice a week on a Tuesday and Thursday 14.00pm -15.00pm in Medical Centre

No appointment needed – can self-refer

They can also be referred from house, dons, counselling service

### **Counselling Service**

Lead by the Lead Pupil Counsellor

Designed to provide a confidential therapeutic service for all pupils

Pupils can self-refer

Be referred by Medical Team

### **School Pastoral Support Group**

The team is made up from the following: Second Master, Deputy Head Pastoral/DSL, DDSLs, Lead Nurse, Lead Counsellor, Senior Housemaster, Director of Studies, Chaplain and the relevant HMs and matrons whom are invited to discuss a pupil of concern. The team meet weekly to discuss:

*Any concerns regarding the pupil*

*The next steps*

*Appropriate support*

*Follow-up pupils of concern each week*

### **Group Sessions**

Sessions run for 5 weeks with JP pupils - run by nurses.

We help encourage discussion on feelings and emotional regulation

Good place to pick up pupils of concern

### **Private Healthcare**

If the medical team in discussion with the school team and parents feel the pupil could benefit from private Healthcare these are the preferred options below

Clinical Psychologist – Dr Angharad Rudkin

Dr Ollie White – Child and Adolescent Forensic Psychiatrist

Dr Bill Young - Child and Adolescent Psychiatrist

### **3.0 Concerns about an Employee**

#### **3.1 Concerning behaviour**

The expectations of staff and the required standards of behaviour are addressed in *Appendix 1: The Code of Professional Conduct for all Staff*. Staff (including supply staff and contractors) or volunteers who act contrary to the advice offered in this document should be reported to the Designated Safeguarding Lead.

Any concerns about a staff member's behaviour that indicates they may not be suitable to work with children should be referred to the Designated Safeguarding Lead. Low level concerns can be shared with either the Headmaster or the Designated Safeguarding Lead.

#### **3.2 When an allegation of abuse is made against an employee or volunteer**

Any employee or volunteer to whom an allegation of any form of abuse is made 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 s/he do x to you?' Use instead a minimum number of open-ended questions such as 'Tell me what has happened', but never ask 'Why?' something has happened as it may infer the victim is to blame).
- Stop asking any more questions as soon as the pupil or adult has disclosed that he/she believes that something abusive has happened to them, 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 may well include the specialist social worker, and that worker may need to involve the police).
- Ask the informing pupil or adult what steps he/she would like to be taken to protect him/her now that an allegation has been made, and assure him/her that the School will try to follow those wishes.
- Refer the matter immediately, with all relevant details to the Headmaster.
- Make a handwritten record as soon as possible of what you have been told, using the child's words as far as possible, and make a copy of this available to the DSL and Headmaster.
- If the allegation is against the Headmaster, or a member of the governing body, report directly to the Fellow with specific responsibility for Child Protection, Mrs Alison Mayne, via her secretary: 01962 621206.
- Do not inform the accused prior to reporting.

### **4.0 After a report is made**

#### **4.1 Elevated Concerns and the Hampshire Safeguarding Children Partnership (HSCP)**

The School has a duty to refer allegations about a staff member to the LADO (as per the flowchart in 2.3). If the accused staff member is dismissed, or would have been dismissed had they not resigned then a prohibition order may be appropriate because of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence. In these circumstances, the matter is then reported to the Teaching Regulation Agency (TRA). If it is clear that the departed accused has harmed, or poses a risk of harm, to a child or vulnerable adult then the School will report the matter to the Disclosure and Barring Service (DBS). The School also agrees to supply information about individuals to the ISI as and when requested to do so.

The School also has a duty to refer information to Children and Young People's Service (Hampshire Children's Services) if it is believed or suspected that a child is suffering or is likely to suffer Significant Harm. Any such referral must be made as soon as possible when any concern of Significant Harm becomes known – the greater the level of perceived risk, the more urgent the action should be. The suspicion or

allegation may be based on information which comes from different sources. It may relate to a single incident or an accumulation of lower level concerns. When in doubt, concerns must be shared.

Investigations into Child Abuse are always externally managed. Employees do not investigate reports of physical or sexual abuse themselves. Alleged victim(s), perpetrator(s), those reporting abuse and others involved will not be interviewed by staff members beyond the point at which it is clear that there is an allegation of abuse. The interviewing of children and adults involved will be carried out by specially trained staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.

#### **4.2 ‘Low Level’ Concerns and the Team Around the Child (TAC)**

If a member of staff has a ‘low level’ concern about another member of staff they must report this. Staff can choose to report their concern to either the Headmaster or the Designated Safeguarding Lead. The Designated Safeguarding Lead will inform the Headteacher. A colleague should not deliberate as to whether a concern is ‘low level’ and thus delay passing the information on. Rather, concerns should be referred on when they become apparent.

‘Low level’ does not mean that a concern is insignificant but rather that it may not meet the harm threshold. A colleague may have a low level concern that is causing a ‘sense of unease’ or a ‘nagging doubt’. This may arise because a member of staff believes that a colleague may be:

- Acting in a way that is inconsistent with the Code of Professional Conduct for All Staff including outside of work
- Humiliating pupils
- Having favourites
- Engaging with a child on a one-to-one basis in a secluded area

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 Headmaster or Designated Safeguarding Lead will always liaise and/or seek advice from the LADO or Hampshire Children’s Services as appropriate and use the Hampshire Child Protection Thresholds Chart to guide the discussion (Appendix 13). The Headmaster and the Designated Safeguarding Lead will not make their own decision about what appear to be borderline cases but will always take advice from appropriate authorities.

Where low level concerns have been raised but not evidenced then the School may deem it appropriate to conduct an initial investigation to clarify its course of action. Where there is found to be evidence of concerns, the School will report its findings to Children and Young People’s Service (Hampshire Children’s Services) and LADO. All rumours and unsubstantiated claims about an employee’s or volunteer’s professional conduct must be reported to the Designated Safeguarding Lead. This includes, but is not limited to, possible unhealthy relations, grooming and their appropriateness to work with children.

Where low level concerns relate to staff conduct or behaviour, but do not amount to potential abuse, the School may choose to take appropriate disciplinary action. Where a pupil has been directly or indirectly implicated in the dealing of a lower level concern, whether substantiated or not, the child’s parents will be informed at the earliest opportunity. This is imperative when handing back parental responsibility during school breaks. Careful consideration must be given to the extent of information shared, especially in the event of unsubstantiated claims about an employee.

The School will consider taking, and as necessary will take, disciplinary action against any employee or agent of the School, where it believes pupils are at risk of abuse from that person, even in cases where there is to be no criminal prosecution. Disciplinary proceedings and grounds for concern over pupils’ welfare may be based on ‘balance of probability’, rather than ‘beyond reasonable doubt’. The School will always seek advice and guidance from the LADO in such cases. In cases where an employee resigns following an allegation, the investigation will nevertheless be concluded and any findings reported to the DBS.

The School acknowledges that its policy will inevitably lead to some investigations being triggered which do not substantiate the allegation made, as well as some that do. It is a basic assumption that it is better to endure some 'false alarms' than to fail to initiate specialist investigation of instances of real abuse.

Poor mental or physical health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health referrals will be made to the Medical Centre. Medical staff may then refer the pupil to a specialist for support. Details of medical referrals are explained in the Education and Well-being policy available on the School website

**If there is a risk of immediate or serious harm a report must be made immediately to Hampshire Children's Services/Police; a report of this nature can be made by anybody and the Designated Safeguarding Lead must be informed afterwards.**

#### **4.3 When an allegation is passed on**

On receiving an allegation of physical or sexual abuse, the Designated Safeguarding Lead, the Headmaster and/or the Fellow with specific responsibility for Child Protection, will:

- Take any steps needed to protect any pupil involved from risk of immediate harm. (This may involve allocating an appropriate staff member, as far as possible a person chosen by the pupil themselves to stay with them. Similarly, an inspector receiving an allegation of abuse at the School may stay with the pupil concerned until suitable arrangements for their protection are made.)
- Not interview or investigate the allegation further, but refer the matter immediately, or, to the authorities:
  - The LADO Tel: 01962 876364, if the allegation involves an employee and ensure that all communication is recorded in writing
  - Hampshire Children's Services Children's Reception Team if the allegation involves pupils or a pupil and their family Tel: 01329 225379 or 0300 555 1384
  - If the allegation involves serious and/or immediate harm, Winchester Police will also be informed Tel: 01962 841534 (Emergency Tel: 999)
- Reports should be communicated personally. Do not rely on leaving a message.
- Reports made to the Designated Safeguarding Lead that involve staff will be forwarded immediately to the Headmaster and the Governor with Specific Responsibility for Safeguarding.
- Consult the LADO/Hampshire Children's Services and follow the advice given about contacting parents, other staff, police, doctor or alleged perpetrator(s) or witnesses direct. Agree with these authorities any necessary next steps in relation to:
  - Informing a pupil's parents (there are circumstances where it would be inappropriate to inform parents immediately when an allegation has been made)
  - Medical examination or treatment for the pupil (there are circumstances where medical evidence will be needed)
  - 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)
  - Informing other appropriate people at the School (including any other staff members) of the allegation and its investigation. Care should be taken at this stage, as knowledge of an allegation or impending investigation can lead to a serious risk of the alleged perpetrator(s) 'covering up' evidence that may be sought by police or putting pressure on others to remain silent.
  - Contacting the authorities will initiate an independent investigation if this proves to be necessary, and the authorities will arrange, within pre-set time limits, the involvement of



the relevant specialist police personnel and if necessary a meeting of the agencies who may need to be involved, together with the School.

- In cases involving a staff member, a School contact will be appointed to inform the accused of the progress of the investigation as agreed with local authorities and the accused should not initiate contact or conduct their own investigation.
- Inform the pupil or adult who made the initial allegation of what the next steps are to be, having agreed these with the authorities (as directed in Part 4 of KCSIE). (It may be helpful for the call to the authorities to be made while the pupil or adult is waiting, so that they can be told the likely next steps immediately after the call. If this is not possible the pupil or adult should be told the next step as soon as possible after the call).
- Inform the Headmaster (unless they are 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.
- On the advice of the local authorities, the Headmaster makes the decision whether to suspend from duty, pending investigation, any employee alleged to have abused a pupil or pupils. (The decision to suspend will be based on firm grounds such as the possibility that the accused could impede an investigation, that there is a continued threat of harm or the allegations are so serious that they are likely to be grounds for dismissal).
- Where a member of boarding staff is suspended as a result of a Child Protection investigation, arrangements will be made to accommodate the staff member away from the boarding house to limit further risk of harm to pupils.
- The School will 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 their wishes fully into account. (This may involve the pupil's receiving continuing support and protection from a staff member chosen by them, or changing boarding accommodation, or returning to their 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 they are at the School). Ensure that any pupil being interviewed by the police has available a supportive member of staff of their own choice to accompany them if this becomes necessary.
- Notify the authorities of the action taken, as soon as possible.
- Notify the Department for Education and the Independent Schools Inspectorate Contact, Daisy Madder ([daisy.madder@isi.net](mailto:daisy.madder@isi.net) or 020 7710 9900) of any allegation against a member of staff that is being investigated by the Children and Young People's Services and/or police.
- Ensure co-operation and information sharing by and with the School in any subsequent investigation by the Children and Young People's Services or 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 their parents where appropriate.
- Note: If an employee resigns during an investigation, the investigation must still be completed and the appropriate referrals must still be made.

A review of the allegation as well as the investigation process through which it was managed will take place and lessons learnt will be incorporated into the School's policies and procedures.

## 5.0 Managing allegations against other pupils (Child on child abuse)

Although the conduct of pupils towards each other is covered by the School Rules and the Winchester Code, some allegations may raise safeguarding concerns. These allegations are most likely to include one or more of the following (definitions available in 2.1):

- physical abuse (eg. hitting, shaking, hair pulling.)
- emotional abuse
- sexual abuse (including sexual violence and sexual harassment, upskirting, sexting) including online sexual exploitation
- initiation/hazing type violence and rituals
- abuse in intimate personal relationships
- bullying

As with allegations against adults, it is the imbalance of power between pupils which is often the most significant factor. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power.

**All child on child abuse is unacceptable and will be taken seriously.**

### 5.1 The safeguarding implications of sexual activity between young people

Situations involving sexual activity between pupils require difficult professional judgment, and the intervention of external agencies is not always appropriate. It will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving an element of coercion or exploitation, or where there is an imbalance of power. It may also be difficult to be sure that what has alleged to have taken place definitely does have a sexual component. Sexting (Appendix 4b) involving under-18s is illegal, and could be a form of child on child abuse.

Decisions will be made on the basis of the best interests of the pupils concerned, and referrals under safeguarding arrangements will be determined by an assessment of the extent to which a pupil is suffering, or is likely to suffer, significant harm. Key considerations will include:

- The age, maturity and understanding of the pupils
- Any disability or special needs of the pupils
- Their social and family circumstances
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed
- Any evidence of coercion or exploitation

**At Winchester College we believe that all children have a right to learn in a safe environment.  
Pupils should be free from harm by adults in the school and other pupils.**

### 5.2 Prevention

As a school, we will minimise the risk of allegations against other pupils by:

- Providing a developmentally appropriate PSHEE and RSE syllabus which develops pupils' understanding of acceptable behaviour
- Having systems in place for any pupil to raise concerns with staff
- Providing appropriate support to pupils identified as being at risk
- Developing robust risk assessments and providing clear targets for pupils identified as being a potential risk to other pupils.

### **5.3 Allegations against other pupils which are safeguarding issues**

Occasionally, allegations may be made against pupils by others in the school which raise safeguarding issues. These may include allegations:

- of abuse (as listed in 2.1)
- involving a pupil's behaviour to a younger, disabled or more vulnerable pupil
- referring to a criminal offence
- about behaviour that has the potential to put other pupils at risk or indicates that other pupils may have been affected
- indicating that young people outside the school may be affected

### **5.4 Procedures**

When an allegation is made by a pupil against another pupil, the member of staff to whom the disclosure is made should make a written note of the allegation and inform the Designated Safeguarding Lead (DSL) who will inform the pupils' Housemaster(s) and then make appropriate referrals.

- If there is an allegation of abuse, the DSL will inform Hampshire Children's Services where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- If the allegation indicates that a potential criminal offence has taken place, Hampshire Children's Services will refer the case to the Multi-Agency Safeguarding Hub (MASH). Police, Health and The Local Safeguarding Authority/Children's Services are represented on MASH and the case will be allocated to the appropriate agency.
- Parents of both the accused pupil, with consent, and the alleged victim will be informed and kept updated on the progress of the referral. However, it is not necessary to gain parental consent prior to making a referral to a statutory agency.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files.
- It may be appropriate to exclude the accused pupil for a period of time, either by keeping them at home or in the Medical Centre until there is an outcome so that they can be supervised.
- Where a member of MASH does not accept the allegation, a thorough school investigation will take place using the School's disciplinary procedures.
- In situations where the School considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan.
- The plan will be monitored and a date set for a follow-up evaluation with everyone concerned.

### **5.5 Victim and perpetrator support**

The school has a duty of care to both its employees and pupils. Access to both medical support and counselling is available to those that require it, regardless of any ongoing matter. A support group will be

offered to the individuals involved formed of appropriate professionals in the case of pupils, and/or close colleagues when relating to an employee. A nominated person will be responsible for liaising with all parties.

A victim should never be given the impression that they are creating a problem by reporting abuse, harassment of any kind. Nor should a victim ever be made to feel ashamed for making a report.

## **6.0 Confidentiality**

Employees 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 only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to resolve the problem, that they will never tell anyone who does not have a clear 'need to know', and that they will 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. Every effort will be made to maintain confidentiality and guard against unwanted publicity for both the victim and the accused. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/TRA publish information about an investigation or disciplinary case.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Where a safeguarding incident occurs, the school will consider making a serious incident report to the Charity Commission.

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WINCHESTER  
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## Code of Professional Conduct for All Staff

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: DSL/2M**

Winchester College is a complex and talented community in which we should all feel able to thrive. A formal Code of Conduct cannot anticipate every eventuality, but what follows tries to set the tone and to describe the sort of behaviour we should adopt as we go about our busy lives. This policy is addressed to all staff, academic and support.

### **Abuse of Positions of Trust**

It is an offence for a School employee, a temporary contractor or a volunteer to engage in intentional sexual activity with or in the presence of a pupil or to incite a pupil to engage in or watch a sexual activity. The School is a place of learning and it is understood that staff will ensure that they deliver appropriate ethical education.

The building of a relationship, trust and an emotional connection with a young person with the intention of manipulating, exploiting or abusing them is a criminal offence. Staff must remain professional at all times and not engage in inappropriate conversation or behaviour with pupils. Forming emotional attachments are more common in boarding environments and whilst staff are encouraged to form healthy working relationships, they must not cross the limit of acceptable professional conduct. It is not uncommon for pupils to become strongly attracted to a member of staff or to develop an infatuation/attachment. If any member of staff becomes aware of such a situation concerning themselves or a colleague, they should discuss it with the Designated Safeguarding Lead (DSL) immediately so that they can receive support on the most appropriate way to manage the situation.

Where pupils, or visiting pupils (including Quiristers), are engaged in close one-to-one teaching, particularly in specialist art, drama, music or sports lessons, the following precautions should be observed: that another staff member is in reasonably close proximity within the building, lessons take place within normal working hours, where possible blinds and curtains are open and that physical touch is minimal, instructive or confined to necessity in order to avoid harm.

### **What about physical contact with pupils?**

It is not illegal to touch a pupil. There are occasions when physical contact, other than reasonable force (using no more force than is needed), with a pupil is proper and necessary. Examples of where touching a pupil might be proper or necessary:

- When comforting a distressed pupil;

- To demonstrate how to use a musical instrument;
- To demonstrate exercises or techniques during PE lessons or sports coaching; and
- To give first aid.

The Child Protection Policy and associated documents that appear in the appendix outline guidelines to all staff on the prevention of abuse covering:

- Staff supervision of high-risk situations.
- Avoidance of inappropriate physical contact between staff and pupils.
- Avoidance of inappropriately spending time alone with individual pupils.
- The need for all staff to be vigilant in spotting and reporting clear suspicions that abuse may be occurring.

Staff are reminded to protect both themselves and their pupils by ensuring that:

- they are sensible when meeting a pupil alone (e.g. inform another staff member of the time and reason for the meeting, leave the door and blinds open during the meeting)
- they maintain integrity when communicating online (e.g. not befriending pupils on social networking sites and communicating using work rather than personal email accounts)
- any physical touch in sports/drama coaching or otherwise is in the presence of another person, minimal, instructive or necessary to avoid harm
- self-referring to the Designated Safeguarding Lead or their Deputy, should they feel they have put themselves into a situation that could be misinterpreted.

### **Low level concerns**

If a member of staff has a 'low level' concern about another member of staff they must report this. Staff can choose to report their concern to either the Headmaster or the Designated Safeguarding Lead. The Designated Safeguarding Lead will inform the Headteacher. A colleague should not deliberate as to whether a concern is 'low level' and thus delay passing the information on. Rather, concerns should be referred on when they become apparent.

'Low level' does not mean that a concern is insignificant but rather that it may not meet the harm threshold. A colleague may have a low level concern that is causing a 'sense of unease' or a 'nagging doubt'. This may arise because a member of staff believes that a colleague may be:

- Acting in a way that is inconsistent with this Code of Professional Conduct for All Staff including outside of work
- Humiliating pupils
- Having favourites
- Engaging with a child on a one-to-one basis in a secluded area

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 Headmaster or Designated Safeguarding Lead will always liaise and/or seek advice from the LADO or Hampshire Children's Services as appropriate and use the Hampshire Child Protection Thresholds Chart to guide the discussion (Appendix 13). The Headmaster and the Designated Safeguarding Lead will not make their own decision about what appear to be borderline cases but will always take advice from appropriate authorities

*Please refer to 4.2 of the Child Protection and Safeguarding Policy for low level concern reporting procedures and further details with regards to allegations against staff. The Whistleblowing Policy can be found as an appendix to the Child Protection and Safeguarding Policy.*

## **Courtesy and Confidentiality**

Colleagues should always be courteous to one another and should show special consideration to new colleagues, for whom the School's traditions, manners and routines can be confusing. People should feel included rather than excluded.

We have much to learn from one another. An atmosphere of mutual support should prevail among so many people with such diverse gifts. We should make a particular point of not discussing our colleagues with our pupils save in the briefest, most complimentary way.

## **Collegiality and Commitment**

We and our pupils benefit from our collegiality and unity. In an institution such as this, there will always be room for debate and disagreement, but divisiveness weakens us. The various sides of the School, while preserving their own identities, should do their best to understand each other and to co-operate diligently. Everyone should respect the wishes and instructions of those who manage them; and those who manage should keep in mind their duty of care to those who answer to them. When we receive requests for information or documentation, we should respond to them punctually.

Wherever possible, colleagues should try to see and appreciate what others are doing, and we should realise that the many activities we offer our pupils can flourish only with the active assistance of all concerned.

We are all guardians of the School's rules and routines. These are established through discussion and agreement. Once they are established, we are obliged to subscribe to them and to enforce them calmly and consistently. We cannot expect our pupils to adopt proper standards of behaviour and dress if we ourselves do not set a right and steady example.

We are guardians of our physical environment here. Just as we should expect to contribute to the description of our routines and to the development of our curriculum, so we should expect to play our part, wherever possible, in discussions about our grounds and buildings. Equally, we have a duty to take care of the School's property and to eschew the waste of its resources.

## **Communication and Complaints**

We prize the arts of conversation and discussion, and we should ensure that we do not, under the pressure of daily business, neglect these. One way to cultivate them is to make a point of attending the various social functions arranged for us.

On no account should any member of staff engage in informal or unseemly email correspondence, texting or the like (including through platforms such as WhatsApp) with any pupil at Winchester College. If a member of staff is in a WhatsApp group with a pupil because of an out of school activity (such as a hockey or cricket club for example) then the member of staff must declare this to the DSL. The member of staff should remember that they are an ambassador for the school whilst a member of any such WhatsApp Group.

An employee with social networking accounts (such as Facebook/Instagram/Snapchat/LinkedIn) must not allow current pupils any level of access to their account or accounts; nor must any employee make contact with any current pupil through their social networking account including via direct message. If a current pupil seeks to connect with you ('add' you or 'follow' you) in any way on a social network, this request should be declined, and a polite email of explanation sent to the pupil via the school network with the DSL copied in.

Employees are strongly advised not to connect with recent pupil leavers through social networking accounts until three years has elapsed since the pupil left (a pupil is considered to have left the school at the start of the next academic year following their departure) and must not connect if the pupil is still of secondary education age (for example if they were to leave in JP). Employees should be particularly mindful that former pupils may well have connections to current pupils (either as siblings or a friends) and that an employee may be making themselves vulnerable through such a social connection. Pupils will be told about this request.

Staff should protect themselves from pupil access to personal staff information that may prove inappropriate and staff should not expose themselves to similar material on pupils' profiles. When a member of staff leaves Winchester, they should not contact (by email, mobile or social media) any current pupil or any recent Old Wykehamist (who has left within the past two years). If they need to make contact for a legitimate purpose, then it must come via the School.

In cases where a former member of staff connects with a current pupil, the school reserves the right to contact the new employer, particularly when any new role involves working with children.

All computer systems are vulnerable to hacking. Therefore, if there is something sensitive to communicate or if there is a difficult issue to resolve or if there is likely to be a difference of opinion, it is better to speak directly to a colleague and to try to diminish any sense of rush. If a colleague comes to know of any misuse or abuse of the School's computer system, that colleague must at once report the matter to the Director of IT.

All of us, including the Headmaster, are willing to receive letters expressing views about School matters. Any written communication between us should always be civil and must always be signed. We should consider our colleagues' arguments and observations sympathetically and always reply. Letters marked "confidential" will be treated as such and their contents will not be taken further without consultation between the correspondents.

Winchester is bound to attract the interest of the press. No one should talk to the press about the School, not even off the record, unless authorised to do so by the Headmaster. If approached by the press we should ask courteously what the call relates to and refer the matter to the Headmaster, via their Secretary.

Should a dispute arise between us as colleagues, we should try to settle matters through discussion. If this does not work, we may seek the help of a head of department or other senior figure; or we may have recourse to the Complaints Procedure; or we may need to invoke the Grievance Procedure. Before taking either of the last two very serious steps, we should take time to think and to consider whether we have already exhausted the informal, human means of resolving a problem.

*For further information please see: The IT AUA, and the Role Description for People with Specific Responsibility for Child Protection in Appendix 2.*





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## Use of reasonable force

Next Review: July 2024

Author: DSL/JPC

This policy refers to and complies with the guidance outlined in Section 550A of the Education Act 1996, and is in line with the Department for Education Guidance 'Use of Reasonable Force' in schools. Reporting and recording guidance is also included.

This policy is intended to clarify how those standards are to be met by the School. It will be reviewed annually to ensure that it complies with current legislation.

### A. What is reasonable force?

Force is usually used either to control or restrain. Control means either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom. Restraint means to hold back physically, using intentional force to restrict a child's movement against his or her will. "Reasonable in circumstance" means using no more force than is needed.

*Physical restraint/control does not include the use of gentle physical prompting or guidance where the child is happy to comply and the aim is to assist him or her to participate appropriately in activities.*

*There are other situations where physical contact may be necessary e.g. demonstrating exercises in PE lessons; administering first aid; or offering comfort to a distressed pupil. This does not constitute restraint but staff should be conscious of pupil perceptions and recognise that for some pupils touching may be unwelcome and misinterpreted despite good intentions.*

- It can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder.
- It must not be used as a form of punishment and must not be used when a less severe response might have effectively resolved the situation.
- Deliberate use of physical contact to punish a pupil, cause pain or injury or humiliation is unlawful, regardless of the severity of the pupil's behaviour or the degree of provocation.
- Reasonable force can be used to search for "prohibited items" but may not be used to search for items banned under school rules.
- Parents should have access to the School's policy on behaviour, discipline and force procedures so that they are fully aware of the actions that may be taken if their child is involved in an incident.

### B. Types of Restraint

**Partial Restraint** covers a wide range of techniques which can be applied in degrees to meet particular circumstances. It may involve:

- a. Physically moving a pupil from a situation where there is an imminent risk of a violent incident and where the pupil has refused to respond to a reasonable verbal request.
- b. Holding pupils to restrict their movements. Retaining a pupil in a confined area in order to prevent individuals or property being damaged. (It is illegal to lock a pupil in a room or cupboard which they cannot leave of their own volition).

**Total Restraint** is where pupils are held in such a way which prevents them from moving. This could mean a pupil being held on the floor. This is an extreme form of restraint and would be used only when an assault was being thought a serious risk to others.

Staff should be aware that for some pupils the use of physical restraint may act negatively as reinforcement for their aggressive behaviour.

### **C. The use of reasonable force**

Physical force must never be used as a punishment. On rare occasions, reasonable force may be necessary: to prevent injury to himself or others; to prevent serious damage to property; or to prevent disruption to important activities. In such circumstances, any member of staff may use reasonable force to control or restrain a pupil, but the force used must be reasonable, and applied for the minimum necessary time. In determining what is reasonable, any disability or SEN must be considered. Reasonable force may be used where the member of staff is lawfully in charge of the pupil, and this includes whilst on school trips.

### **D. Reporting use of reasonable force/control**

Where force has been required, the staff involved must immediately inform the Headmaster, or in her absence the Second Master, and the Designated Safeguarding Lead. The member of staff must also record the details of the incident in writing as soon as possible after the incident and forward these to the Headmaster. The report form at the end of this document may be used if desired. The Headmaster will determine how the incident is recorded and whether it should be reported to parents. All incidents will be recorded on CPOMS as a matter of course.

## Reasonable force/control – incident report form

### 1. Basic information

Name of Pupil: \_\_\_\_\_ DOB: \_\_\_\_\_ Yr: \_\_\_\_\_ House: \_\_\_\_\_

### 2. Events leading to this incident

2.1 Where did the incident occur? \_\_\_\_\_  
Day/Date: \_\_\_\_\_

2.2 When did the incident occur? Time: \_\_\_\_\_

2.3 How did the incident begin?

### 3. Describe the incident

3.1 What was happening at the time?

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3.2 Was anyone else involved? \_\_\_\_\_

3.3 Did anyone else see what happened? (give details) \_\_\_\_\_

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3.4 What behaviour was the pupil presenting that warranted restraint/control?

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3.5 Was there damage to property or an assault on a pupil or staff during the incident?

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3.6 What did you do to try to defuse the situation before using restraint/control?

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3.7 (i) How was the pupil restrained/controlled? (describe) \_\_\_\_\_

e.g. two people escort; one person wrap; supine control

(ii) For how long?

(iii) By how many staff \_\_\_\_\_

\_\_\_\_\_ members?

### 4. Injuries sustained

4.1 Was anyone injured? **YES / NO**

If yes, give details \_\_\_\_\_

4.2 Was this recorded in the accident book? **YES / NO**

4.3 Was the pupil checked for injuries by a member of staff who was not involved in the incident?

**YES / NO** If yes, by whom? \_\_\_\_\_

### **5. Follow up Action**

5.1 The incident was reported by to the Head Master by: \_\_\_\_\_

Incident form completed by: \_\_\_\_\_ Post held: \_\_\_\_\_

Date: \_\_\_\_\_ Copies to the DSL, House Master and the HM

### **E. Telling parents when force has been used on their child**

The College will speak to parents about serious incidents involving the use of force and discuss how best to record such serious incidents. In deciding what a serious incident is, the College will consider the:

- pupil's behaviour and level of risk presented at the time of the incident;
- degree of force used;
- effect on the pupil or member of staff; and
- the child's age.

Note: Parental consent is not required to use reasonable force on a pupil.

### **F. What happens if a pupil complains when force is used on them?**

All complaints about the use of force should be thoroughly, speedily and appropriately investigated.

- Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.
- When a complaint is made the onus is on the person making the complaint to prove that his/her allegations are true – it is not for the member of staff to show that he/she has acted reasonably.
- Suspension must not be an automatic response when a member of staff has been accused of using excessive force. The College should refer to the “Allegations made against/Concerns raised in relation to teachers, supply teachers, other staff, volunteers and contractors” guidance<sup>1</sup> where an allegation of using excessive force is made against a teacher. This guidance makes clear that a person must not be suspended automatically, or without careful thought.
- Schools must consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.
- If a decision is taken to suspend a member of staff, the school should ensure that the member of staff has access to a named contact who can provide support.
- Governing bodies should always consider whether a member of staff has acted within the law when reaching a decision on whether or not to take disciplinary action against the member of staff.

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<sup>1</sup> Part 4 of KCSIE, *see* Appendix 15 of the Child Protection and Safeguarding Policy:

<https://www.winchestercollege.org/explore/governance-and-our-policies/policies>

- As employers, schools and local authorities have a duty of care towards their employees. It is important that schools provide appropriate pastoral care to any member of staff who is subject to a formal allegation following a use of force incident.
- A complaint must be made in accordance with the Complaints Policy available on the School's website.



WINCHESTER  
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## Role Description for People with Specific Responsibility for Child Protection

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: DSL**

### **Headmaster:**

The Headmaster ensures that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

### **Designated Safeguarding Lead:**

The Governing Body ensures that the College designates an appropriate senior member of staff from the College's leadership team to take lead responsibility for safeguarding and child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. The DSL must sit on the Senior Management and report directly to the Headmaster and the Governing Body.

The broad areas of responsibility for the Designated Safeguarding Lead are:

#### Managing referrals

Refer immediately all cases of suspected abuse to the local authority children's social care and:

- The designated officer(s) for child protection concerns (all cases which concern a staff member),
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).

Liaise with the Headmaster to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

Act as a source of support, advice and expertise to staff on matters of, safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as support for staff who make referrals to the Channel programme.

Be aware of the requirement for children to have an appropriate adult.

#### Information Sharing and File Transfers

Make sure that Child Protection files are kept securely and up to date

Make sure that files are only shared with those who need to see the information

Make sure that Child Protection Files are transferred to the new school within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file; secure transit should be arranged and confirmation of receipt should be obtained.

### Training

The Designated Safeguarding Lead should receive appropriate training carried out every two years, in addition to regular updates via e-bulletins and CPD events, in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help assessments. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the College's Child Protection and Safeguarding Policy and procedures, especially new and part time staff. This includes online safety and an awareness of the monitoring and filtering systems in place in the College, as well as the expectations, applicable roles and responsibilities of colleagues in relation to the filtering and monitoring.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure records of concerns and referrals.
- Understand and support the school or college with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Have the lead responsibility for safeguarding and online safety which includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to these system. They should understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst online.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.
- Ensure all staff have received appropriate up-to-date training. Training records are maintained in the HR Department.

### Raising Awareness

The Designated Safeguarding Lead should:

- Ensure the College's policies are known and used appropriately, including those relating to online safety as detailed above.
- Ensure the College's Child Protection and Safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- Ensure the Child Protection and Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this.

- Link with the local Safeguarding Partnerships to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- All concerns, discussions and decisions and reasons for those decisions are to be recorded securely in writing, reviewed regularly and any patterns addressed.
- Convene the weekly Pastoral Support Group in their capacity as the Deputy Head Pastoral

#### **Deputy Designated Safeguarding Lead:**

The Deputy Designated Safeguarding Lead acts in the absence of the DSL, although the ultimate lead responsibility remains with the DSL and should not be delegated. They should:

- Attend weekly Pastoral Support Group meetings to ensure they are aware of current safeguarding issues.
- Organise file transfers for new pupils.
- Be on call and in possession of the duty mobile according to the rota.
- Oversee cases that involve internal support when there are a large number of Safeguarding cases that cannot be managed by the DSL alone.
- Manage cases where there is a conflict of interest for the DSL.
- Aid in the drafting and reviewing of policies.

#### **The Senior Management Committees are responsible for:**

- Ensure Safeguarding is on the agenda of all meetings.
- Meeting with the Designated Safeguarding Lead regularly to discuss matters of mutual interest and to be briefed accordingly.
- Keeping up to date through training at least every two years.
- Supervising and implementing revisions that address weaknesses in Child Protection Policies and Procedures without delay.
- Undertaking an annual review of the effectiveness of the School's Child Protection and Safeguarding Policy and procedures (in conjunction with the Designated Safeguarding Lead).

#### **The Second Master:**

- Attends the Pastoral Support Group meeting
- Deals with pupil disciplinary matters.
- Conducts termly consultations with pupils.

#### **The Fellow with specific responsibility for Child Protection matters is responsible for:**

- Meeting with the Designated Safeguarding Lead regularly (once a term) to discuss matters of mutual interest and to be briefed accordingly.
- Keeping up to date through training at least every two years.
- Supervising and implementing revisions that address weaknesses in Child Protection Policies and Procedures without delay.
- Undertaking an annual review of the effectiveness of the School's Child Protection/Safeguarding Policy and procedures (in conjunction with the Designated Safeguarding Lead).



- Taking the lead on behalf of all fellows in matters of Child Protection and Safeguarding, and of Health and Safety, where Fellows collectively have particular responsibility.

### **The Governing Body:**

- Is overseen by the Warden who appoints a Fellow with specific responsibility for Child Protection and sets his/her terms of reference.
- Ensures the School complies fully with its obligations, both legal and moral, in Child Protection and Safeguarding.
- Reviews and approves Safeguarding Policies and Procedures annually to ensure that they comply with current guidance including in online safety
- Monitors the effectiveness of the staff to whom they delegate safeguarding responsibilities
- Reviews records of serious cases and incidents in order to provide adequate evidence based on feedback in the annual safeguarding report and on the extent of compliance with the charity's policies
- Reviews and approves Safeguarding Policies and Procedures following major incidents to ensure that they are suitable for the particular needs of the pupils and staff
- Monitors the charity's compliance with its legal duty to refer to the Disclosure and Barring Service.

### **The Pastoral Support Group:**

- Meets weekly to discuss matters of mutual interest.
- Is attended by the Second Master, Deputy Head (Pastoral)/DSL , Deputy DSLs, Director of Studies, Senior Housemaster, College Chaplain, Lead Nurse and School Counsellor.
- Is a professional pupil-centred discussion that considers, at all times, what is in the best interests of our pupils.
- Establishes a safe and confidential network to share information to best support pupils and colleagues.
- Reviews and assists in the drafting of Safeguarding Policies and Procedures



WINCHESTER  
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## Important Phone Numbers

Reviewed: August 2023

Author: DSL

In addition to your Housemaster, Assistant Housemaster, Tutor, Matron, Div Don or any other adult, you may seek assistance at any time from:

Chaplaincy	
The <b>Revd Hester Jones</b> , Dean of Chapel:	<a href="mailto:hj@wincoll.ac.uk">hj@wincoll.ac.uk</a>
The <b>Revd John Storey</b> , Chaplain	<a href="mailto:jrs2@wincoll.ac.uk">jrs2@wincoll.ac.uk</a>
<b>Mr Andrew Sparkes</b> , Senior Lay Chaplain:	07833 645514, <a href="mailto:ajs@wincoll.ac.uk">ajs@wincoll.ac.uk</a>
<b>Mr Liam Dunne</b> , Roman Catholic Lay Chaplain:	07568 541924, <a href="mailto:ld@wincoll.ac.uk">ld@wincoll.ac.uk</a>
<b>Dr John Cullerne</b> , Master in Charge of Faith Circles	07796 792624, <a href="mailto:jpc@wincoll.ac.uk">jpc@wincoll.ac.uk</a>

<b>Designated Safeguarding Lead (DSL)</b>	07436 588321, <a href="mailto:safeguarding@wincoll.ac.uk">safeguarding@wincoll.ac.uk</a>
Designated Safeguarding Lead & Deputy Head Pastoral, <b>Mrs Ali Harber</b>	01962 621179, <a href="mailto:ah@wincoll.ac.uk">ah@wincoll.ac.uk</a>
Deputy DSL & Second Master, <b>Mr Iain Smith</b>	01962 621142, <a href="mailto:2m@wincoll.ac.uk">2m@wincoll.ac.uk</a>
Deputy DSL & Director of Safeguarding, <b>Mr Callum Barnes</b>	<a href="mailto:cpb@wincoll.ac.uk">cpb@wincoll.ac.uk</a>
Deputy DSL & Surmaster Pastoral, <b>Mr Simon Mildinhall</b>	01962 621127; <a href="mailto:sjm@wincoll.ac.uk">sjm@wincoll.ac.uk</a>
Deputy DSL, <b>Mrs Belén Lopez</b>	<a href="mailto:mbl@wincoll.ac.uk">mbl@wincoll.ac.uk</a>
Deputy DSL, <b>Mr Jack Fisher</b>	<a href="mailto:jff@wincoll.ac.uk">jff@wincoll.ac.uk</a>
Governor with specific responsibility for Child Protection, <b>Mrs Alison Mayne</b> (via her secretary)	01962 621206, <a href="mailto:jm1@wincoll.ac.uk">jm1@wincoll.ac.uk</a>

Confidential Pupil Counsellor	
Sara Holland	07735 796895, <a href="mailto:pupils@wincoll.ac.uk">pupils@wincoll.ac.uk</a>
Caroline James	
Charlotte Pickance	
TBA	

Independent Listener	
Mrs Elizabeth Webster	07793 076006, <a href="mailto:elizwebster99@gmail.com">elizwebster99@gmail.com</a>

Winchester College Medical Centre	
Lead Nurse, <b>Mrs Karlene Cullen</b> & Nursing Team	01962 621228, <a href="mailto:wcmc@wincoll.ac.uk">wcmc@wincoll.ac.uk</a>

School Doctor, <b>Dr Laura Francis (St Paul's Surgery)</b>	
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<b>Local Agencies</b>	
Children's Services Department - up to 18 years	0300 555 1384, <a href="mailto:childrens.services@hants.gov.uk">childrens.services@hants.gov.uk</a>
Adult's Health and Care Services - over 18 years	0300 555 1386, <a href="mailto:adult.services@hants.gov.uk">adult.services@hants.gov.uk</a>
Local Area Designated Officer (LADO), <b>Mrs Fiona Armfield</b>	01962 876364, <a href="mailto:child.protection@hants.gov.uk">child.protection@hants.gov.uk</a>

<b>National Agencies</b>	
Independent Schools Inspectorate	0207 600 0100, <a href="mailto:concerns@isi.net.org">concerns@isi.net.org</a>
ChildLine	0800 1111
Samaritans	116 123, <a href="mailto:jo@samaritans.org">jo@samaritans.org</a>
Police, Ambulance, Fire	999
Department of Education Counter Extremist Helpline	020 7340 7264, <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>

The Children's Commissioner for England – **Dame Rachel de Souza** spends lots of time listening to what children and young people who live away from home, or who are receiving social care support, have to say about how they are looked after. If you would like to contact Rachel, or any other member of her team through their 'help@hand' initiative, here's how to do it:

- Help@Hand freephone: 08005280731 and email: [help.team@childrenscommissioner.gov.uk](mailto:help.team@childrenscommissioner.gov.uk)
- The Office of the Children's Commissioner for England: 0207 783 8330, [info.request@childrenscommissioner.gov.uk](mailto:info.request@childrenscommissioner.gov.uk)
- Or write to: Office of Children's Commissioner, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT

We will not tell anyone it was you who contacted us about any problems unless you ask us to - but if you tell us something which makes us believe that you or another child or young person is in danger of being seriously harmed, then we will need to pass that information (and who you are) on to the right people to try to protect you or them. We will let you know if we do this.

## Payphones

Please note that there are two payphones for the use of all pupils. These are located at:

1. The foyer of Music School.
2. Thule Passage, Chamber Court.



## Counter Bullying Policy and Strategy

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: DSL/2M**

**Approved: Governing Body 26 June 2021**

*This policy is directed by the DfE advice Preventing and Tackling Bullying, July 2017.*

Winchester College aims to be a caring community where individual and collective responsibilities are paramount. We aim to create a culture and environment where pupils and staff are treated equitably with due regard for protected characteristics such as race, ethnic origin, nationality, gender, disability, age, religion, sexual orientation, marital/parental status, political belief and social/economic group.

We recognise that bullying between our pupils presents particular challenges especially where the pupils involved are living in the same boarding house and when the majority of our pupils do not go home as often as others might. As such our counter bullying strategy seeks to promote positive relationships between pupils of all ages, encourages older pupils to proactively look out for younger ones and model positive behaviour, as well as seeking to enable all pupils to tell someone if they are being bullied. We aim to be a community that is truly inclusive; that understands, appreciates and values the equality and diversity of each individual and creates an environment that makes people feel valued and able to participate and achieve their full potential. Bullying undermines this aim and will not be tolerated.

**It is everyone's responsibility to prevent bullying from happening** and with this in mind this Counter Bullying Policy lays down certain guidelines.

### **Definition of Bullying**

Bullying is defined as any repeated behaviour - verbal, psychological, electronic, social or physical - directed towards another which intentionally physically or emotionally hurts another individual and prevents them from living at ease with themselves or other members of the School. Bullying often involves an imbalance of power, which could for example be social, emotional or physical. It is often prejudiced against individuals or particular groups on the grounds of race, religion, culture, gender, sexual orientation, special educational needs and disability or because a child is adopted or is a carer.

*For example it can be:-*

- Name calling.
- Making fun of someone in an unpleasant way.
- Sexual misconduct, which includes sexist language and sexual harassment.
- Unwanted touching.
- Stealing, breaking or hiding someone's possessions and/or repeatedly using someone else's possessions without their consent

- Storing or sending inappropriate material or messages electronically (defined as cyber bullying and including social networks, mobile phones, text messages, photographs, email, and the school's own platforms such as Teams). For more information about this, refer to the Online Safety and Counter Cyber Bullying Policy.
- Pushing or hitting someone.
- Frightening someone into doing things they do not want to do (coercion).
- Intimidation to prevent someone doing something they want.
- Excluding another from a game, conversation or information.

*It is not Bullying, for example when:*

- Two people have the occasional disagreement;
- Senior pupils are appropriately carrying out their responsibilities to supervise others, carrying out daily routines to ensure the smooth running of House and School;

*Bullying can occur between:*

- Pupil to pupil. See below.
- Adult to pupil. See Sections 1-5, Child Protection & Safeguarding Policy and the Complaints Procedure Policy.
- Adult to adult. See Staff Code of Professional Conduct document and Whistleblowing Policy.
- Pupil to adult. The Second Master or Deputy Head Pastoral will investigate and then refer the matter to the Headmaster. A record of the incident and the response will be kept by the Second Master.

Bullying behaviour is demeaning and frightening and can cause psychological damage and even suicide. At Winchester we aim to provide a safe and stimulating environment, including within the electronic network, in which every pupil can reach their full potential in all areas. The essence of this experience is that each person will gain self-esteem and be uniquely valued by others. We, as a staff, have a responsibility to help both the bully and the victim.

## **Counter bullying Strategy**

### **The prevention of bullying**

We are pro-active and aim to provide:

- An atmosphere and culture across the College which builds positive self-image and friendships among pupils of all ages and commends positive behaviour in all areas.
- One-to-one contact with personal tutors in every house for each pupil on a regular basis.
- Opportunities for all pupils to speak to or communicate with someone they trust if they are experiencing bullying or know someone who is
- A structured PSHEE programme within the curriculum tutorial time which develops personal and inter-personal skills and deals specifically with the issue of bullying, including instances of bullying, including sexual bullying. The programme also addresses bullying arising from prejudice against pupils on the basis of gender or sexual orientation, bullying against pupils with learning difficulties, special educational needs and disabilities, and bullying against pupils from different cultures and family circumstances.
- Reassurance that all senior pupils with some responsibility for younger pupils are sensitively prepared for this role and receive regular support.
- Staff and pupils who challenge and report inappropriate behaviour (calling out/calling in)
- Staff who are aware that they act as role models in terms of communication and respect for each other and their pupils.

– Child Protection and Safeguarding Policy

- INSET days for staff on how to react to and deal with instances of bullying or possible bullying. Staff are trained so that the principles of the School policies are understood and the needs of their pupils are acknowledged.
- Appropriate internet security, filtering and IT education.

## **Monitoring**

Monitoring in School is achieved through:

- Staff vigilance and professional curiosity (as well as good pupil/staff and good pupil/tutor relationships).
- Records on CPOMS and their analysis
- Making bullying an item on the agenda of all Pastoral Support Group Meetings at which, if necessary, any bullies or pupils at risk are discussed.
- PSHEE discussions.
- Appropriate internet monitoring and filtering
- Awareness raising and surveys amongst pupils and staff.
- The Designated Safeguarding Lead (Deputy Head Pastoral), Headmaster and Second Master regularly report to the Governing Body about bullying, monitor bullying records and update and amend relevant policies and procedures as required.

## **What happens when bullying occurs?**

The School will react firmly and promptly where bullying is identified. There is a range of follow-up steps available to the staff depending on the situation. Some of these steps include:-

- Discussion with staff and pupil(s).
- Imposition of sanctions and referral to senior staff.
- Communication with parents.
- All incidents are recorded on CPOMS.

## **The 'mediation' approach**

There is not always a quick and easy way to change the behaviour of children who use bullying tactics. Educating and raising awareness are key to success: talking to bullies, getting them to see that their behaviour is upsetting to others and getting them to suggest better ways of behaving are often more effective than punishing and reduce the likelihood of the 'revenge' factor. Sanctions, however, should be used where appropriate, as part of the wider strategy, particularly if mediation is unsuccessful.

Sometimes bullying involves a specific serious incident, such as a serious physical or sexual assault, including rape. In such situations, the Designated Safeguarding Lead will contact Hampshire Children's Services for guidance or to make a referral.

## **What can all staff members do?**

In some cases victims of bullying do not want anyone else to know what is happening, because they:

- do not want to tell tales;
- do not want the bully to be punished;
- are afraid of what the bully will do;
- have become demoralised and feel they do not deserve any better.

For these reasons we always need to be pro-active in our counter bullying strategy (this includes geographical location and time of day). We must:

- Encourage all pupils to break the silence about bullying behaviour. Emphasise that those who watch bullying and do nothing about it are encouraging and endorsing bullying behaviour.
- Respond immediately, swiftly and unambiguously to individual incidents of bullying and inform relevant colleagues who will provide support, investigate and mediate/invoke the disciplinary process as appropriate.
- Use the pastoral network to raise awareness and identify ways of reducing the risk of bullying at times and in places where it is most likely.
- Support and protect children who are being bullied and help them develop positive strategies and assertion. They need a balance between protection and empowerment. Keep a special watch on those involved.
- Help bullies to change their behaviour.
- Inform parents at an early stage.
- Record incidents using CPOMS.

Training on counter bullying will be given to staff.

### **Advice to pupils**

Pupils should report any instances of bullying, including the bullying of another pupil, to any of the following:

- In the House:** parents,  
Housemaster,  
Assistant Housemaster,  
House Tutor,  
Matron.
- In the School:** a Don,  
a senior pupil,  
a doctor or nurse at the Medical Centre  
a counsellor, [pupilcounsellor@wincoll.ac.uk](mailto:pupilcounsellor@wincoll.ac.uk)  
a chaplain  
the Headmaster or Second Master  
the Designated Safeguarding Lead,  
Mrs Ali Harber (07436 588321)  
a Deputy Designated Safeguarding Lead,  
Mr Callum Barnes, Mr Iain Smith, Mr Simon Mildinhall, Mrs Belén Lopez or Mr Jack Fisher (07436 588321)
- Outside the School:** an independent listener  
Mrs Elizabeth Webster (07793 076006)

There are lists of additional people you can talk to on your house notice board including ChildLine (0800 1111), the Children's Commissioner (0207 783 8330) and the Independent Schools Inspectorate ([concerns@isi.net.org](mailto:concerns@isi.net.org) or 0207 600 0100). The Children's Commissioner also operates a help@hand initiative which is a free helpline for all children living away from home.

Help@Hand freephone: 08005280731 and email: [help.team@childrenscommissioner.gov.uk](mailto:help.team@childrenscommissioner.gov.uk)

The National Youth Advocacy Service can also provide additional support and advice should you need help in sharing your feelings. Their Freephone helpline is 08088081001 and their website is here: <https://www.nyas.net/get-support/support-for-young-people/advocacy/>

If you are being bullied, it is always better to tell someone, because:

- sharing what is happening will help you to deal with your feelings;
- bullying thrives on secrecy – it is best dealt with by being brought into the open;
- it may save other people from becoming victims of the same bully.

**REMEMBER do not stand by and watch someone being bullied. It is everyone's responsibility to prevent it happening.**

### **What happens next?**

Any of these people will be able to advise and support you and to help you take this matter further. In most cases the action taken in the first instance will not be disciplinary – a bully will be asked to talk about their behaviour and encouraged to find ways to change it. It may sometimes be the case that the bully genuinely has not recognised the distress caused to the victim by their behaviour. If those responsible for the bullying behaviour repeat it, sanctions may be applied. Ultimately a bully who will not change their behaviour may have to leave the School.

When bullying has been reported and action to prevent it has been taken, the situation will be monitored carefully by staff to prevent it recurring. Everyone involved has responsibility for helping the bully to change their behaviour. In addition, the victim may need to deal with their feelings and to understand and overcome their vulnerability.





## Online Safety and Counter Cyber Bullying Policy

**Reviewed: August 2023**

**Next Review: July 2024**

**Author: DSL**

**This policy must be read in conjunction with the School's Counter Bullying Policy, Staff Code of Conduct (Employees) and Acceptable User Agreement.**

Our intention is to ensure that pupils fully understand and are prepared for the possibilities – both positive and negative – presented by the digital world.

As well as the information provided in this document, the following resources provide useful advice and guidance:

[Appropriate Filtering - UK Safer Internet Centre](#)

[Appropriate Monitoring - UK Safer Internet Centre](#)

[www.childnet.com](http://www.childnet.com)

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

[www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)

[www.saferinternet.org.uk](http://www.saferinternet.org.uk)

[www.internetmatters.org](http://www.internetmatters.org)

[www.educateagainsthate.com](http://www.educateagainsthate.com)

<https://parentzone.org.uk/>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

[www.stopcyberbullying.org](http://www.stopcyberbullying.org)

### **Keeping Safe Online**

The school acknowledges that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams

### **Filtering and Monitoring**

The School is equipped with a robust monitoring and filtering service called Lightspeed which operates across the school network and on every school device (currently the Surface Pro). This software blocks users from accessing inappropriate websites on the school network and also records search terms, with the ability to block search terms or alert on particular searches, for example 'self-harm'. The filtering on the network is permanently in place on all school devices and the usage of the school network is monitored on a daily basis. The DSL and Head of Infrastructure liaise frequently when concerns arise over pupil usage.

The School is committed to protecting pupils and staff from potential harm deriving from their use of the internet, mobile telephones and other electronic and digital technology or systems. The School Network is subject to continuous monitoring in the interests of safeguarding the wellbeing of all members of the School community. The School takes reasonable steps to control and monitor the use of the internet and other electronic means of communication without disproportionately compromising pupils' privacy or their ability to communicate with their parents/carers or outside agencies. It also does not unreasonably impact teaching or learning or school administration, nor does it restrict pupils from learning how to assess and manage risk themselves.

The filtering and monitoring system utilises blocklists to prevent users from accessing inappropriate websites. The blocklist categories are reviewed by the DSL, the Second Master (also a DDSL), the Director of Safeguarding and the Surmaster Pastoral (Head of PSHEE & DDSL), alongside the Director of IT and the Head of Infrastructure.

A regular safeguarding report is generated for housemasters and the safeguarding team to review. Initial conversations with pupils are held by housemasters who may refer the concern on to the Surmaster Pastoral and/or the DSL if deemed necessary. The Surmaster Pastoral meets fortnightly with the Head of Infrastructure to review trends and pupils of concern, and to check that the appropriate follow up has been put in place.

All staff have an important role to play in the physical monitoring of pupils' use of IT. This might be in a lesson, during toytime or more generally across the campus. Staff should report concerns about a pupil's use of IT to the safeguarding team.

The Online Monitoring Group, comprising the Director of IT, Director of Studies, Deputy Head Pastoral (DSL), Head of PSHEE and a Housemaster Representative meet termly to discuss the effectiveness of the IT arrangements. The DSL and Surmaster Pastoral liaise frequently (often daily) with the Head of Infrastructure over inappropriate use of the network by pupils and the resulting follow up actions. An online safety review is carried out annually by the Head of Infrastructure in conjunction with the Director of IT and the DSL.

Parents are strongly encouraged to consider having content filters or parental controls in place on their broadband network at home.

Pupils who attempt to circumvent the filtering and monitoring systems are in breach of the School Rules and the Acceptable Use Agreement (AUA) and place themselves at risk. Pupils are also liable to be sanctioned for any breaches of the school rules. Pupils are responsible for everything they do when using the school network and must adhere in all cases to the terms of the AUA, a copy of which they are asked to sign when they join the school and at regular points thereafter.

Pupils are made aware of the role that they have in keeping themselves safe online; the tutor group programme and the PSHEE programme involve talks and discussions with pupils and parents about the safe use of the internet. The School is particularly alert to the way in which individuals or groups use the internet for grooming and so it has robust IT filtering systems to keep pupils safe when using the School Network.

Further information about this can be found in the PSHEE Policy, and the IT AUA.

The School's IT AUA aims to ensure that pupils are responsible in their use of IT (including the use of IT in the classroom, which is supported by the School's Surface Policy), making sure that they safeguard their own wellbeing, do nothing that adversely affects others, adopt good practice to enable the efficient operation of the School network and do not waste time. The IT AUA:

- defines what constitutes safe and acceptable use of the internet and any other electronic and digital services to which pupils have access whether or not provided by the School
- identifies clearly what pupils are and are not allowed to do in the digital environment
- provides clear information and guidance about how to be safe in the digital environment
- requires pupils to confirm that there is no harmful content downloaded onto any device they bring into school and that they do not download any harmful content onto their device via 3G, 4G, 5G which bypasses the school's filtering and monitoring systems

Pupils are expected to confirm their agreement to adhere to the policy online on a regular basis.

In addition to this, the following actions are deemed illegal under The Computer Misuse Act 1990 and therefore a pupil must not:

- attempt to log onto the network with any username or password that is not their own, or change any other person's password, with the intent to use that account for unauthorized purposes;
- reveal their password to anyone except to a system administrator;
- use or possess any computer programme designed to reduce network security.
- leave any device logged on when unattended, even for very short periods of time.

Any attempt to breach The Computer Misuse Act will be treated as serious. Breach of this Code will lead to disciplinary action. Serious or repeated breaches may lead to dismissal.

### **Mobile phones**

Access to the internet on mobiles has made unsuitable material easily available to children. It is impossible entirely to prevent pupils from accessing unfiltered internet content via their personal mobile data allowance; however, we strongly encourage parents to set up filters on their child's phones which exclude such content, and when they are at school pupils should only use the school's Wi-Fi on their phone. The use of a Virtual Private Network (VPN) is considered a deliberate act to circumnavigate the school's filtering system and contravenes the AUA.

Additionally, we give the following advice to our pupils:

- never give out any information about yourself online;
- if you receive an unknown call, ask the caller to identify himself/herself – particularly if no number is displayed;
- if you receive a call or text from a problem number, don't respond, and then block calls from that number;
- do not leave alternative contact details on your voicemail greeting;
- be very careful to whom you give your number and ask those to whom you have given it not to pass it on.

If you do receive a nuisance or unsolicited text message, you should:

- never respond to the message;
- show it to a trusted family member, teacher or parent;
- keep the message as evidence;
- make a note of the sender's number

### **Picture & video messaging**

Pupils must be very cautious about how they share images of themselves taken on their phones. Control over the images is immediately lost and they can end up in the hands of strangers. Images have the potential to be used to fuel bullying, harassment and exploitation.

We advise our pupils:

- never to send pictures that embarrass other people or show them partially clothed: this is especially true of images taken of other children<sup>2</sup>;
- posting photos of yourself online in public areas can help you to be identified by strangers;
- sending unpleasant or indecent images to others is an offence in certain situations, even when the sharing of images is consensual (see below);
- watch out for people – particularly unknown adults – taking pictures of you or your friends;
- if you are sent an image of an assault on another person, keep the image and show it straightaway to a trusted adult.

Winchester College has the power to confiscate and search any electronic device if there is reason to suspect that it has been, or is likely to be, used to commit an offence or cause personal injury or damage to property. The school may examine and erase any data or files on the device where there is a good reason to do so (unless there is a requirement to involve the police), such as the potential to cause harm, disrupt teaching or break the school rules. The powers to search in the Education Act 1996 are compatible with ECHR Article 8. Further information can be found in the school's Search and Confiscation Policy.

### **Social media**

We give the following advice to our pupils regarding Facebook, Twitter, Snapchat, Instagram and other social media platforms:

- remember that anyone, anywhere, could potentially see what you have posted, even if you think you have highly personal settings; some universities and potential employers check applicants' posts on such sites;
- be careful about posting pictures of yourself if they can identify where you live, go to school or otherwise spend time; do not use Snap Map or other features which identify to other users where you are;
- never post pictures that embarrass other people or show them partially clothed; Creating, storing and/or sharing sexual photos and videos of under 18s is illegal, even when the sharing of images is consensual.
- be careful who you share information with;
- do not reply to messages from people you don't know; keep your friends list to people you actually know as distinct from strangers;
- report anything odd or disturbing – or instances of bullying – to an adult and the website itself;
- be aware of the risks associated with collaborative on-line gaming; some users may use the social interaction in an attempt to exploit you.

### **Use of the network for gaming at school**

Pupils are permitted to play computer games:

- between Tea and 1855 Monday - Saturday;
- in the time between the end of Preces and bedtime, providing all the evening's work has been satisfactorily completed;
- for no more than two hours on Sundays

The School reserves the right to ban computer games, which it deems inappropriate or damaging. No pupil may play a game which has been classified (as in a 15 or 18 certification) as unsuitable for their age.

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<sup>2</sup> Please see Section 4b of the Child Protection and Safeguarding Policy:  
<https://www.winchestercollege.org/explore/governance-and-our-policies/policies>

## **Use of computers for educational purposes at school**

Our aim is to help prepare our pupils for the digital, connected workplace they will soon be entering.

At Winchester we are adopting and deploying technology in teaching and learning which will provide dynamic, creative and collaborative educational tools for our pupils. An upgraded network and the introduction of a Virtual Learning Environment (Microsoft Teams) are redefining our approach to the use of IT by teachers and pupils in the classroom, as well as in boarding houses and at home.

In addition to online learning materials devised by teachers and disseminated electronically to pupils, the Microsoft Suite provides pupils with their toytime (homework), timetable and reminders of other commitments within a controlled environment.

Since September 2018 we have specified a hybrid laptop (the Microsoft Surface Pro) which we will require pupils joining JP (Y9) to bring to school. There are distinct advantages in terms of familiarity and uniformity for all pupils and their teachers to be working from the same machines.

It is unlikely ever to be our aim for pupils to undertake all of their learning on a computer. However, pupils will be using their devices to complete an increasingly wide variety of tasks:

Communicating and collaborating with their teachers and with their peers.

- Producing class and homework assignments as directed by their teachers, using materials that have been produced by them and online learning resources.
- Producing word-processed toytime (homework) assignments, other exercises such as presentations, calculations, spreadsheets, graphics, musical compositions, etc.
- Undertaking tasks such as speaking, listening (for Music, English or Modern Languages) that exploit the range of digital media available.
- Undertaking guided online research on specific topics, and learning best practice in respect of the attribution of sources, bibliography etc.

## **Counter cyber bullying policy**

Cyber bullying can be defined as ‘the use of IT, particularly mobile phones and the internet, deliberately to upset someone else’. It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target. However, it differs in several significant ways:

- a far more extreme invasion of personal space;
- the potential for anonymity on the part of the bully;
- the potential for the bully to play to a larger audience;
- the difficulty in controlling electronically circulated messages.

Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Cyber bullying takes different forms: threats and intimidation, harassment or ‘cyber-stalking’ (e.g. repeatedly sending unwanted texts or instant messages), vilification/defamation, exclusion/peer rejection, impersonation, unauthorised publication of private information/images and manipulation. Sexual misconduct can be particularly destructive when perpetrated online through for example, the unwanted sharing of images, and can also involve the sharing of inappropriate jokes and messages. This should never be taken as “banter” or just as a part of growing up. Pupils are educated on the subject of cyber bullying via the PHSEE programme and through pastoral support in Houses from Housemasters and Tutors and they are encouraged to report instances of this or any other dangerous or suspicious online behaviour to be dealt with in accordance with the procedures laid down in the School’s Counter Bullying Policy.

Instances of cyber bullying should be reported in the same way as any other forms of bullying as laid out in the School's Counter Bullying Policy. All staff have a responsibility to safeguard the welfare of pupils online by educating them, supporting them and reporting any instances of cyber bullying or other dangerous or suspicious online activity in line with School procedures.



## Youth Produced Sexual Imagery (Sexting)

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: DSL**

Creating and sharing sexual photos and videos of under-18s is illegal. If an incident in which a pupil under the age of 18:

- creates and shares nudes and semi-nudes of themselves with a peer under the age of 18;
- shares nudes and semi-nudes created by another person under the age of 18 with another person; or
- is in possession of nudes and semi-nudes created by another person under the age of 18

comes to your attention, it should be referred to the DSL as soon as possible. You should not view youth produced sexual imagery unless there is good and clear reason to do so.

Along with our own Safeguarding and Child Protection procedures, the school will follow the advice given in *Sharing nudes and semi-nudes: advice for education settings working with children and young people' 2020* (UK Council for Child Internet Safety, UKCCIS), in which it states:

- The DSL will hold an initial review meeting with appropriate school staff
- subsequent interviews with the young people involved (if appropriate)
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to local authority children's social care and/or the police immediately.

The decision to respond to the incident without involving the police or local authority children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support. For example, where an incident can be defined as 'experimental' and there is no evidence of abusive or aggravating elements.

If managed internally, pupils will be instructed to delete the imagery and to confirm that they have done so on all devices, online storage or social media sites within an agreed timeframe. Failure to do so is a criminal offence and the matter will be referred to the police.

The sharing of nudes and semi-nudes of under 18s by **adults** is illegal and should always be reported to the police.



## **Gender Identity Policy**

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: HM, Nominated Safeguarding Governor, DSL**

[https://www.equalityhumanrights.com/sites/default/files/technical\\_guidance\\_for\\_schools\\_england.pdf](https://www.equalityhumanrights.com/sites/default/files/technical_guidance_for_schools_england.pdf)

### **Introduction**

We aim to be a happy, open, trusting and well-ordered community at Winchester College, free from teasing, harassment, bullying or abuse. We aim to provide a safe, friendly and supportive environment in which each pupil knows they are valued as an individual, and we aim to meet their pastoral, social and academic needs in an atmosphere of respect and toleration.

This policy describes measures in relation to a change in a pupil's gender identity, providing guidance to pupils, parents and staff about how the school will offer support. It also serves to raise awareness of questions about gender, as part of all pupils' preparation for their future, within and beyond the school.

### **Principles**

Gender reassignment is included in the 2010 Equality Act, which states: 'A person has the protected characteristic of gender reassignment if the person is proposing to undergo, or is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.'

Legally, a birth certificate can only be changed through a gender recognition certificate, which can only be made from 18 years of age, except under specific circumstances usually of a medical nature. This means that in certain situations such as census information or examination certificates the school will need to continue to use the gender and birth name stated in the pupil's birth certificate.

We recognise a pupil may be considering or preparing for, and possibly starting, gender reassignment during their time at school. The emphasis of this policy is on pastoral support, though it refers also to practical matters.

### **Support and the process of Gender Transition**

In the early stages gender transition may not involve a change in physical appearance. The school needs to be notified to ensure appropriate support and reasonable practical arrangements associated with the decision. We might be informed by the pupil - via a member of staff or the medical team - by parents or guardians, or when the pupil joins the school.

A small panel of staff supervised by the Deputy Head Pastoral will assess the individual case. The pupil [and under normal circumstances their parents] will be consulted, to allow them to reflect on the decision and how the school can best support them. The age and circumstances of the pupil, as well as the advice of



outside agencies, are likely to be important in determining ongoing pastoral support, which may also include outside agencies. Pastoral support will include [though not be limited to] how the pupil is to be addressed with respect to personal pronouns, the understanding of their decision by the wider community, and considering sensitive aspects of the curriculum, in particular PSHEE.

The panel and the pupil, normally with their parents, will clarify the reasonable practical arrangements necessary. These might include boarding, sleeping and toilet arrangements, sports options and changing facilities, and arrangements on trips involving overnight stays.

All gender identity matters are individual - the support we describe is designed to allow flexibility of approach, and so consultation and discussion with the individual pupil remain crucial.

### **Support of Pupils**

We seek to give support which is well-informed, flexible and clear, expecting to engage with a pupil considering the question of their gender identity.

We expect information to be treated sensitively and confidentially by all members of the school community. The pupil will be consulted and their agreement obtained if the school sees the need to share information, unless the pupil's safety and vital interests would otherwise be compromised.

The school would expect parents to be aware of gender identity dilemmas and, ideally, fully involved in providing support, since, in general, the school's experience is that shared understanding and concerted action between the three parties of pupil, parents, and school provides the most effective way forward in almost all pastoral situations. The school will also engage, where appropriate, with outside agencies in order to provide the best possible support, though support in the first instance will be provided via the pastoral team, including [not exclusively] the Housemaster, Matron, House Tutors, Counselling Service and Medical Centre, at all times and by all parties within the framework of the Gillick ruling\*.

The school does not tolerate any kind of harassment, and transphobic harassment would be dealt with in the same way as other forms of bullying, as detailed in the school's clear Counter Bullying policy [found as Appendix 4 of The Child Protection and Safeguarding policy].

*\* 'The Gillick ruling holds particularly significant implications for the legal rights of minor children in England in that it is broader in scope than merely medical consent. It lays down that the authority of parents to make decisions for their minor children is not absolute, but diminishes with the child's evolving maturity. The result of Gillick is that in England today, except in situations that are regulated otherwise by law, the legal right to make a decision on any particular matter concerning the child shifts from the parent to the child when the child reaches sufficient maturity to be capable of making up his or her own mind on the matter requiring decision'.*



## Missing Pupil Policy

**Reviewed: July 2023**

**Next Review: July 2024**

**Author: DSL/2M**

The Procedure for Missing Pupils at Winchester College is guided by the Independent Schools' Bursars Association 'Guidance on Missing Child Policy & Procedures when a Child is Not Collected on Time' which is aligned with DfE, ISI and OFSTED guidance, in addition to the DfE document *Children missing education* September 2016.

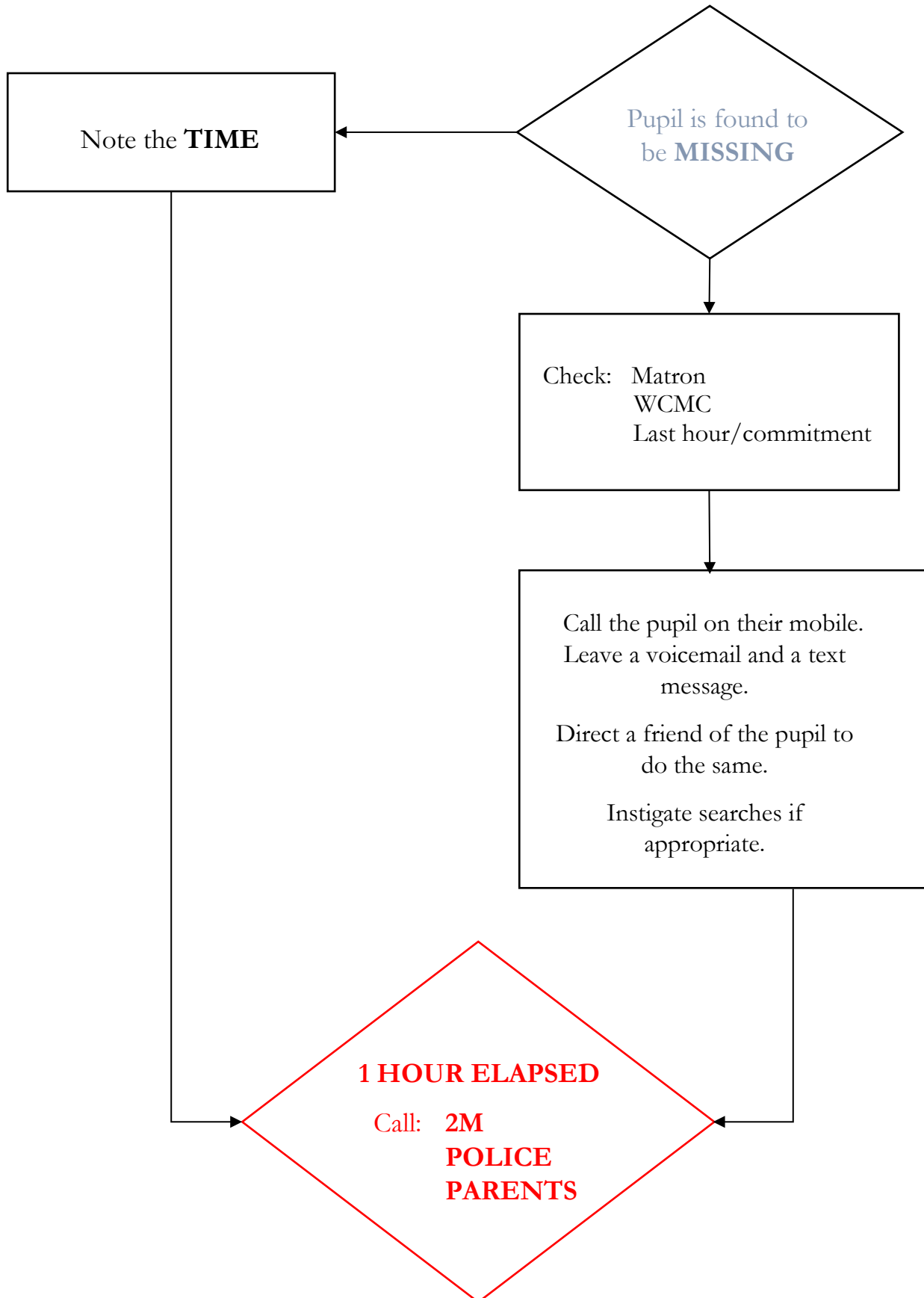
The welfare of all of our pupils is our paramount responsibility. Every adult who works at the School is aware that he/she has a responsibility for helping to keep all pupils safe at all times. Our staffing ratios are generous and are designed to ensure that all pupils are appropriately safeguarded.

### Procedures to Prevent Missing Pupils

- All pupils are registered in their Boarding Houses at meal times. Matrons record absences for pastoral reasons on the central computer system, iSAMS. The administration office records absences for academic reasons on the same system. Day pupils are also registered in their boarding houses.
- The register is taken during each lesson during the day and absences are registered on iSAMS.
- The iSAMS register is checked by the Second Master's office.
- The register is taken during extra-curricular sporting activities. Absences are recorded on SOCS.
- In the evenings, the register is taken before Toytime (prep), at Preces (notices at 2100/2115) and again before bed.
- In unscheduled hours such as weekends pupils must inform their Housemaster, or his representative, of the reason for their absence and sign out on the register. They must sign in again on their return. Parents should use the Microsoft Forms system for Sunday sign-out.
- Day pupils and their parents complete a Weekly Whereabouts Form indicating when the pupils are staying past tea time on a weekday and whether they will be in school on a Saturday evening/Sunday. Day pupils sign in and out of their boarding houses at the beginning and end of their school day.
- Unauthorised absences are reported to the School Office during the academic day and Housemasters at other times.
- Parents needing to take a pupil out of school during scheduled hours must seek and obtain permission in writing from the Undermaster.

### Missing Pupil Procedure

Procedures to be followed if a pupil is missing



Actions on return, full debrief of pupil then:

- If absent minded/first offence – strong admonition & consider gating
- If second offence or deliberate absconding refer to Second Master with full account
- Consider referral to other agencies and drawing up an Individual Welfare Plan if absence caused by distress

### **Procedures to be followed if a pupil is not collected on time**

Prior to School breaks, Housemasters make contact with parents or legal guardians and ensure that they are familiar with the travel arrangements for each pupil. If a pupil is not collected within an hour of the agreed collection time, the Housemaster will telephone the parents or legal guardians. If there is no answer, the Housemaster will phone the emergency numbers for that pupil. During this time, the pupil will be cared for in their Boarding House.

If there is no response from the parents' or guardians' contact numbers or the emergency numbers within a 3 hour period, or when the premises are closing, the Housemaster will contact the Designated Safeguarding Lead who will inform Hampshire Children's Services who will make emergency arrangements for the pupil. The School will make a written report of the incident and submit it to Hampshire Children's Services. During this time, the School will ensure that the pupil is safely cared for.

### **Pupils Missing from Education**

The Registrar's Office will inform the Local Authority of pupils that join the school at JP (Year 9). The Designated Safeguarding Lead (DSL) will inform the Local Authority of pupils who are of compulsory school age that join outside of this regular transition time.

- The Headmaster will inform the DSL if a pupil leaves the School.
- The Designated Safeguarding Lead will then inform the 'Children Missing Education' team of any pupil who is going to be deleted from the admission register where they:
  - have been taken out of school by their parents and are being educated outside the school system e.g. home education;
  - have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
  - have 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 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;
  - have not returned to school for ten days after an authorised absence or are absent from school without authorisation for twenty consecutive school days, having made reasonable enquiries to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause;
  - have been permanently excluded.

**Children Missing Education Team: Email:** Via the generic address: [cme@hants.gov.uk](mailto:cme@hants.gov.uk) **Phone:** 01962 845363.



## School Recruitment, Selection and Disclosure Policy and Procedure

Reviewed: August 2023

Next Review: September 2024

Author: RAC

Approved: Senior Management Committee

### 1.0 Introduction

The school is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The school is also committed to providing a supportive and flexible working environment to all its members of staff. The school recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who shares this commitment.

The aims of the school's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, relationship status, maternity or paternity, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (**DfE**) *Keeping Children Safe in Education* (September 2023) (**KCSIE**), *Disqualification under the Childcare Act 2006* (**DUCA**), the Prevent Duty Guidance for England and Wales 2015 (the **Prevent Duty Guidance**) and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**); the current Independent School Inspectorate Handbook (ISI); the Education (Independent School Standards) Regulations 2014 (ISSRs) and the National Minimum Standards (**NMS**) for Boarding Schools;
- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

## 2. Data protection

The School is legally required to carry out the pre-appointment checks detailed in this policy and procedure. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Staff Privacy Notice.

## 3. Recruitment Process – Application to interview

When a post becomes vacant, the Head of Department (HoD) should discuss the vacancy with the Human Resources Director (HRD) to decide whether or not the post is to be filled. Guidance will be taken from either the Headmaster (for academic vacancies) or Bursar (non-teaching vacancies) as to whether recruitment is justified. Usually the decision will be made to fill the vacancy. However, in some circumstances the vacancy may not be filled (e.g. restructuring, redeployment etc.).

Once the vacancy is agreed, the HRD will review the job description and person specification before placing appropriate advertising. The relevant HoD should draw up with the HRD an agreed timetable setting out interview questions and selection methods. All permanent vacancies, where possible, will be advertised on the school website, and may also be advertised on third party websites, in local media, etc. These advertisements will be coordinated by the HR Office.

All vacancies will have both a **job description\*** and a **person specification\*\*** which will be published online with the vacancy. These will, in the main, appear as a combined document, entitled 'job description'. The School's Safeguarding and Child Protection Policy and procedures is part of the online, and paper if required, application process and it is a condition of applicants that they sign to acknowledge receipt; it is also published on the school's website, and is also available by request from [recruitment@wincoll.ac.uk](mailto:recruitment@wincoll.ac.uk).

All applicants for employment will be required to complete an **online application form** containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided.. A 'curriculum vitae' cannot be accepted in place of the completed application form.

Applicants will also be asked to provide details of their online profile, including account names and social media handles so that online searches can be carried out on shortlisted candidates (see section 4 for more information). This information must be provided by the applicant in order for the application to be accepted.

Applications may be considered as they arrive. The school reserves the right to make an appointment prior to any closing date.

At the closing date, HR will send a complete set of applicants' forms and their details to the HoD (or an alternative coordinator, as specified by the HRD, after consulting with the Headmaster or Bursar).

Shortlisting should be made on the basis of the person specification criteria and must be objective, i.e. based on evidence of how candidates meet the criteria. Best practice will be followed where possible in that shortlisting will be conducted by an appropriate shortlisting panel who will be involved in the process. Where one manager is deemed to carry out the shortlisting process HR will support so as to ensure

consistency. The shortlisting individual or panel will decide, on the evidence given in the application form, which applicants best meet the criteria. Not all applicants who meet the minimum criteria are guaranteed an interview.

Telephone sift interviews may be used in the selection of candidates at any stage in the process. Specifically in academic selection, the Deputy Head (Academic) may use the telephone interview to ascertain candidate's suitability and availability.

On confirmation of the shortlist, HR will write to all unsuccessful candidates.

Applicants may then be invited to attend a **formal interview** at which relevant skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with children.

All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

If a candidate requires adjustments to be made in order to attend and participate in the interview, he/she must request these when accepting the school's invitation to attend. There is an opportunity for this request to be made on the application form. Every effort will be made to meet the identified need.

In academic interviews, unless candidates specify otherwise, the school will, where possible, write for references after a candidate has been shortlisted. Ideally, all references will be available to the interview panel at the time of the interview. Candidates will also be expected to bring to the interview the original certificates of their relevant qualification(s) and also proof of identity, preferably in the form of a passport. A copy will be taken and retained with the candidate's application.

Candidates are required to present documentation to demonstrate their right to work in the UK before the interview may commence.

### **3.0 Pre-Interview Process**

HR will communicate with all candidates as soon as possible after the closing date in the advertisement if they are to be invited for an interview.

The candidate will be interviewed by a series of managers using both one to one and panels with skills and expertise relevant to the post. If appropriate, these will include members of the Governing Body and/or external consultants.

- 3.1.0 Shortlisted candidates may be given details of the selection methods the school will be using. In normal circumstances this will include the following:
  - 3.1.1 a tour of the school site;
  - 3.1.2 a series of interviews, including panels of up to four managers, with pre-set questions for all candidates;
  - 3.1.3 in academic recruitment, a lesson designated by the Head of Department and marked by a teacher on the appropriate mark sheet; sufficient notice will be given of age and ability range of pupils and expected content of lesson via the appropriate form;

- 3.1.4 in support departments, skills tests if applicable, set and agreed beforehand with the HRD;
- 3.1.5 if applicable, psychometric tests to measure the competencies of candidates;
- 3.1.6 if appropriate, an interview with the Headmaster or Bursar;
- 3.1.7 all candidates will be asked the same core questions, with supplementary questions asked by managers as they see fit;
- 3.1.8 every candidate will be assessed for their capability/fitness to work with children/young people;
- 3.1.9 All interviewers will take notes during the interview. These notes will be kept with the candidate's application form.

#### **4.0 Practical Assessments**

4.1 Where practical assessments are used as part of the selection process they should aim to provide the following:

- 4.1.1 additional information about a candidate's knowledge, skills and aptitude; extra information for the selection process.
- 4.1.2 Appointments will not be made solely on the basis of practical assessment.
- 4.1.3 Candidates will be given the opportunity to receive professional feedback on their performance in assessments.

#### **5.0 Other Information**

The decision of the interview panel is made on the basis of information given during the process.

#### **6.0 Recruitment and selection procedure**

In accordance with the recommendations set out in the Guidance, KCSIE and the requirements of the Education (Independent School Standards) (England) Regulations 2010 and the NMS for Boarding Schools the school carries out a number of pre-employment checks in respect of all prospective employees.

If the School decides to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the school's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
- verification of the applicant's employment history
- the receipt of two references (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory;
- for teaching positions, confirmation from the Teaching Regulation Agency that the applicant is not subject to a prohibition order, has not failed their induction or probation or have a sanction imposed;
- the receipt of an enhanced disclosure from the DBS which the school considers to be satisfactory;
- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the School.
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School



- where the position amounts to ‘regulated activity’ confirmation that the applicant is not named on the Children's Barred List administered by the DBS\*;
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School;
- verification of the applicant's medical fitness for the role (see section 7 below);
- verification of the applicant's right to work in the UK;
- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK; and)
- verification of professional qualifications which the school deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

**\* The School is not permitted to check the Children’s Barred list unless an individual will be engaging in “regulated activity”. The School is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity.**

**However, the School can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e roles which would amount to the regulated activity if carried out more frequently.**

**A check of the Children's Barred List is not permitted if an individual will not be undertaking ‘regulated activity’. Whether a position amounts to ‘regulated activity’ must therefore be considered by the school in order to decide which DBS checks are appropriate. It is however likely that in nearly all cases a Children's Barred List check will be carried out.**

## **7.0 Medical fitness**

The school is legally required to verify the medical fitness of anyone to be appointed to a post at the school. Applicants will be asked to state that they are capable of fulfilling the job as outlined in the job description at application stage. In addition, a health screening questionnaire will be completed **after** an offer of employment has been made but **before** the appointment can be confirmed. The school will arrange for the information contained in the Health Questionnaire to be reviewed by the school's medical advisor, if applicable.

This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed timetable, extra-curricular activities, and layout of the School etc. If the school's medical advisor has any doubts about an applicant's fitness, the school will consider reasonable adjustments in consultation with the applicant. The school may also seek a further medical opinion from a specialist, or request that the applicant undertakes a full medical assessment.

The school is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

### **Pre-employment checks**

In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs Education (Independent School Standards) Regulations 2014 [\* and the *Boarding schools: national minimum standards*] the School carries out a number of pre-employment checks in respect of all prospective staff.

In fulfilling its obligations to carry out pre-employment checks the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

### **Online searches**

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with KCSIE this will include online searches on shortlisted candidates (**online searches**). The online searches the School carries out may include searches of internet search engines, websites and social media platforms. Applicants are asked in the application form to provide details of their online profile, including account names and social media handles. This information will be used to carry out online searches. Applicants are not required to provide account passwords or to grant the School access to private social media accounts .

Online searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The School will not carry out online searches as part of its initial sift of applications.

The School will determine how it approaches online searches on a case by case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

Wherever possible online searches will be undertaken by a person who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the School is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied;
- may be relevant to their suitability to work at the School or in an education setting;
- is of a safeguarding nature; and/or
- may have an impact on the School's reputation (whether positive or negative).

Any information generated from online searches will be entered in an 'Online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches.

In evaluating any online information for relevance the School will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information could have an impact on the School's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and

- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its Retention of Records Policy after employment ends.

For unsuccessful candidates, the School retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

## 8.0 Verification of identity, qualification, right to work and address

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents at Appendix 1 (these requirements comply with DBS identity checking guidelines). Candidates are required to provide the following:

- one document from Group 1 as listed in Appendix 1; and
- two further documents from either of Group 1, Group 2a or Group 2b, one of which **must** verify the applicant's current address as listed in Appendix 1;
- a document confirming the applicant's Right to Work in the UK, as listed in Appendix 2 (this may be the same document as being used as a Group 1 or Group 2 document for DBS purposes);
- original documents confirming any **relevant** educational and professional qualifications referred to in their application form.

The School asks for this information at interview to ensure that the person attending interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.

Where an applicant claims to have changed his/her name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change.

The school asks for the date of birth of all applicants (and proof of this) to assist with the vetting of applicants. Proof of date of birth is necessary so that the school may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The school does not discriminate on the grounds of age.

**Right to work in the UK:** all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist': (Right to work checklist ([publishing.service.gov.uk](https://publishing.service.gov.uk))).

The School will check this evidence in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 1 July 2021' (Code of practice on preventing illegal working ([publishing.service.gov.uk](https://publishing.service.gov.uk))).

**Qualifications:** all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which the School requests.

## 9.0 References

In the case of teaching appointments in particular, and where candidates have approved contact in non-teaching positions, references where ever possible will be taken up on short- listed candidates prior to interview. References may however be taken up after interview by exception / agreement

All references received from a school must be countersigned by the Head of that school and where possible verbal clarification will be sought prior to interview.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the school. One of the references must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of 'Extremism' (see the definition of "extremism" at section 8 below). All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness\* and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated, unfounded or malicious;
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated, unfounded or malicious;
- whether the applicant could be considered to be involved in 'extremism' (see the definition of 'extremism' at section 8 below)

(\*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made.)

The school will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The school will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarifications before an appointment can be confirmed.

If factual references are received i.e those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although an additional reference may be sought before an appointment can be confirmed.

The School may at its discretion make telephone contact with any referee to verify the details of the written reference provided.

The School treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

All internal candidates who apply for a new role at the School will have their application assessed in accordance with this procedure. References will be taken up on all internal candidates as part of the application process but can be provided by colleagues as the School will be the most recent employer.

The NMS for Boarding Schools recommends that direct contact be made with the referees of any person applying for a position working with boarders. The school goes beyond those standards by making direct inquiries with referees of applicants for all positions where possible.

The application form requires all applicants to supply a full employment history. Applicants should understand that the school may approach any previous employer for information.

Wherever feasible, before appointment, the school will contact each previous employer involving work with children or vulnerable adults to check the reasons the employment ended.

The school will require an explanation of any gaps in an applicant's CV and the HRD will make a written record that explanations for any gaps in the CV of a successful applicant have been sought and are satisfactory.

## **10. Prohibition Checks**

### **10.1 Prohibition from teaching check**

The School is required to check whether staff who carry out "teaching work" are prohibited from doing so. The School uses the Teaching Regulation Agency Teacher Services system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

In addition the School asks all shortlisted applicants for roles which involve "teaching work" (and their referees) to declare in the application form whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the Teaching Regulation Agency or other equivalent body in the UK.

It is the School's position that this information must be provided in order to fully assess the suitability of an applicant for a role which involves "teaching work". Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

The School carries out this check, and requires associated information, for roles which involve "teaching work". In doing so the School applies the definition of "teaching work" set out in the Teachers'

Disciplinary (England) Regulations 2012 which states that the following activities amount to "teaching work":

- planning and preparing lessons and courses for pupils
- delivering lessons to pupils
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

The above activities do not amount to "teaching work" if they are supervised by a qualified teacher or other person nominated by the Head. If in any doubt or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

In addition, for all appointments made on or after 18 January 2016, where an applicant has carried out teaching work outside of the UK the School will ask the applicant (and their referees) whether they have ever been referred to, or are the subject of a sanction issued by, a regulator of the teaching profession in the countries in which they have carried out teaching work. This will include checking for the existence of any sanctions issued by regulators of the teaching profession in other EEA countries using the Teaching Regulation Agency Teacher Services system.

## **10.2 Prohibition from management check**

The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school (a **section 128 direction**).

This check applies to appointments to the following positions made on or after 12 August 2015:

- Head
- teaching posts on the senior leadership team
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

All individuals who are appointed to the governing body will be subject to a section 128 direction check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the School obtains for all posts at the School that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. The School will use either, or both, methods to obtain this information.

In addition, the School asks all shortlisted applicants for management roles to declare in the application form whether they have ever been the subject of a referral to the Department for Education, or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent school.

It is the School's position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body whether that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

## **10.3 Disqualification from acting as a charity trustee or senior manager**

**9.1.1 Background** Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

#### **9.1.2 Who is covered**

A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent school the trustees will typically be the governors of the school.

Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the School the disqualification rules will be applicable to all governors, the Head / Principal, Bursar and potentially other senior staff who report directly to the governors.

There is no single list or register that covers all of the disqualification criteria and the School therefore adopts a pragmatic approach to checking whether a person is disqualified. This is achieved by the use of a self-declaration form and the checking of relevant publicly accessible registers.

#### **9.1.3 Self-declaration**

All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to the School's attention may result in the termination of an appointment as a governor or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform the School if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

#### **9.1.4 Checks by the School**

To ensure that it has accurate and up to date information the School will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- (a) the Bankruptcy and Insolvency Register;

- (b) the register of disqualified directors maintained by Companies House; and
- (c) and the register of persons who have been removed as a charity trustee.

### 9.1.5 Waiver

A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

The School may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. The School is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

## 11.0 Criminal Records Check

**Due to the nature of the work, the school applies for an enhanced disclosure from the DBS in respect of all prospective staff members, governors and volunteers.**

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as 'spent' under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the school.

As of 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and the Home Office have developed a set of filtering rules relating to spent convictions, details can be found in the school's policy on the recruitment of ex-offenders.

The school applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the school which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of, the school (whether paid or unpaid), will amount to 'regulated activity' if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the 'period condition', meaning four times or more in a 30 day period; and
- provides the opportunity for contact with children.



Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

This definition will cover nearly all posts at the school. Limited exceptions could include an administrative post undertaken on a temporary basis in the school office outside of term time.

It is for the school to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances.

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the school. It is a condition of employment with the school that the **original** disclosure certificate is provided to the school, in person, within two weeks of it being received by the applicant. A convenient time and date for doing so should be arranged with the HR Office as soon as the certificate has been received. Original certificates should not be sent by post. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy by post or email within [\* two weeks] of the original disclosure certificate being received. Certified copies must be sent to the HR Department. Where a certified copy is sent, the original disclosure certificate must still be provided [\*prior to the first day of work/on the first working day].

Employment will always remain conditional upon the original certificate being provided and it being considered satisfactory by the school before starting work.

If there is a delay in receiving a DBS disclosure the Headmaster, Bursar, or HRD has discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. The School will take into account the "DBS unusual addresses guide" in such circumstances. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s) if this is practically possible.

The School takes into account the guidance issued by the NSPCC when deciding whether to request overseas information from applicants, which recommends that such information should be sought on those who have lived overseas for periods of three months or more in the last five years. However, the School recognises that Education (Independent School Standards) Regulations 2014 do not specify that a minimum period of overseas residence is required. The School therefore assesses each applicant's situation on its individual facts.

Where applicants are provided further overseas information this will include a criminal records check from the relevant jurisdiction(s) or a certificate of good conduct (as appropriate) and/or references from any employment held.

Work can only commence once sufficient overseas information has been received and only if the School has considered that information and confirmed that the applicant is suitable to commence work at the School.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any

sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the School, continued employment will remain conditional upon the School being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the School may allow an applicant to commence work if they are considered suitable based on all of the information that has been obtained during the recruitment process.

The School will take proportionate risk based decisions on a person's suitability in these circumstances. All suitability assessments must be documented and retained on file

If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

## **12.0 Regulated activity**

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended).

The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant

is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it is carried out:

- (d) frequently, meaning once a week or more; or
- (e) overnight, meaning between 2.00 am and 6.00 am; or
- (f) satisfies the "period condition", meaning four times or more in a 30 day period; and
- (g) provides the opportunity for contact with children.

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

It is for the School to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances.

### **13.0 Volunteers**

The school will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the school (the definition of regulated activity set out in section 10.0 above will be applied to all volunteers).

The school will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the school has deemed appropriate to supervise and ensure the safety of those pupils in their care.

Under no circumstances will the school permit an unchecked volunteer to have unsupervised contact with pupils.

It is the school's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the school for three consecutive months or more. Those volunteers who are likely to be involved in activities with the school on a regular basis may be required to sign up to the DBS update service as this permits the school to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition the school will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers;
- character references from the volunteer's place of work or any other relevant source;
- an informal safer recruitment interview.

### **13.0 Visiting speakers, the Prevent Duty and other matters**

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised. Other matters relating to keeping pupils safe from manipulation, indoctrination and exploitation also require these protocols to be followed

The school is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the school.

All visiting speakers will be subject to the School's usual visitors protocol in the Visitors and Security Policy. This will include signing in and out at Reception, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

The school will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the school. In doing so the school will always have regard to the Visitors and Site Security Policy, the Prevent Duty Guidance, the potential for manipulation, indoctrination and exploitation, and the definition of "extremism" set out in KCSIE which states:

*"Extremism" is vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."*

In fulfilling its Prevent Duty and other obligations the school does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

### **14.0 Contractors and Agency Staff (Supply Staff)**

Agencies and Contractors who supply staff to the school must also complete the pre-employment checks which the school would otherwise complete for its staff. The school requires confirmation that these checks have been completed before an individual can commence work at the school.

The school will independently verify the identity of staff supplied by contractors or an agency in accordance with Section 8 above and requires the provision of the DBS disclosure certificate before those individuals can commence work at the School.

More detailed Policy Guidance can be found in the school's policy on the use of contractors and supply staff.

### **15.0 Whistleblowing and exit interviews**

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the Whistleblowing policy, the Safeguarding policy and the Staff Code of Professional Conduct). All staff receive training so that they

understand the School's expectations. Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at an exit interview which may be held with leavers.

The school's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information, but is under no obligation to do so.

### **Referrals to the DBS and Teaching Regulation Agency**

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position at the School despite being barred from working with children; or
- has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, the School may also decide to make a referral to the Teaching Regulation Agency.

### **16.0 Queries**

If an applicant has any queries on how to complete the application form or any other matter he/she should contact the HR Office via [recruitment@wincoll.ac.uk](mailto:recruitment@wincoll.ac.uk).

### **17.0 Policy Review**

This policy will be reviewed annually to ensure it complies with current legislation. It may be reviewed more frequently, if relevant legislation is updated.

\* The **job description** describes the post in detail and is a guide to the level and range of responsibilities the post holder will be expected to undertake initially. It is not exhaustive and may be changed from time to time to meet changing circumstances and demands. It will not form part of the post holder's contract of employment.

\*\* The **person specification** is a list of criteria identifying the skills, knowledge, abilities, aptitudes and qualifications or experience required to carry out the duties of the job effectively. The criteria must be clear, fair and justifiable, but not directly or indirectly discriminatory. The criteria must also be job-related, reasonable and focussed on skills rather than personality. Specific headings are:

- Qualifications and experience – what qualifications or equivalent (where there is a specific requirement for the job) and experience the candidate needs;
- Knowledge, skills, aptitude and abilities – the other qualities the candidate will need in order to do the job.

The person specification should identify which criteria are essential and which desirable.

† The **formal interview** may be either a one-to-one interview or a panel interview. It may involve more than one stage. The nature and complexity of the interview will depend on the nature and complexity of

the role being applied for. Candidates will be informed of the nature of the interview when they are invited to interview.

**Note**

All driving licences must be valid.

If a document in the list of valid identity documents is:

denoted with \* - it should be less than three months old

**denoted with \*\* - it should be less than 12 months old**

**List of valid identity documents**

**Group 1: primary identity documents**

- current valid passport
- biometric residence permit (UK)
- current driving licence (photocard - full or provisional (UK/Isle of Man and Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

**Group 2a: trusted government documents**

- current driving licence (photocard - full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands)
- current driving licence (paper version if issues before 1998; UK / Isle of Man / Channel Islands and EEA; full or provisional)
- birth certificate - issued after time of birth (UK, Isle of Man and Channel Islands)
- marriage / civil partnership certificate (UK and Channel Islands)
- Immigration document, visa or work permit (issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa / permit must relate to the non UK country in which the role is based)
- HM Forces ID card (UK)
- fire arms licence (UK, Channel Islands and Isle of Man)

### **Group 2b: Financial and social history documents**

- mortgage statement (UK)\*\*
- bank / building society statement (UK and Channel Islands)\*
- bank / building society statement (countries outside the UK)\*
- bank / building society account opening confirmation letter (UK)\*
- credit card statement (UK)\*
- financial statement - e.g. pension, endowment, ISA (UK)\*\*
- P45 / P60 statement \*(UK and Channel Islands)
- council tax statement (UK and Channel Islands)\*\*
- letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)\*
- benefit statement - e.g. child benefit, pension (UK)\*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue & Customs, Jobcentre, Jobcentre Plus, Social Security (UK and Channel Islands) \*
- EEA national ID card (must be valid at time of application)
- cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of applications)
- letter from Head or College Principal (UK: for 16-19 year olds in full-time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).



## **Use of Supply Staff and Contractors Policy**

**Reviewed: August 2023**

**Next Review: September 2024**

**Author: RAC**

### **1.0 The Use of Supply Staff**

Winchester College recognises that all departments may, from time to time, have a requirement to employ temporary staff when permanent staff are not available.

Authorisation should be sought from the HR Director (HRD) in all instances and only approved agencies used. At present the recognised employment agencies are 1-1 Recruitment and Blue Arrow. These suppliers have been approved by the HRD and have confirmed that they are able to carry out the required level of safeguarding checks on their staff (see section 6 of the Recruitment Policy).

All agency staff must adhere to the Standards as set out in the School Policy on Recruitment and Selection. This includes proof of identity, reference checks, a satisfactory enhanced DBS check and not being barred from working with children. All the relevant checks will have been verified by the employment agency and it will be their responsibility to ensure that all details are sent to the HR Administrator at [temps@wincoll.ac.uk](mailto:temps@wincoll.ac.uk) before any person commences work.

If the enhanced DBS check done by the agency has disclosed anything, this must be shared by the agency with the HRD, in order that a decision can be made regarding the supply staff and a risk assessment completed if necessary.

Upon arrival at the School, the agency staff member will have their identity checked by their HoD/Line Manager. The HoD/Line Manager will ask to see the supply staff member's passport and DBS, in the instance that the agency have not provided scans of this documentation prior to the agency staff worker commencing their first shift, the line manager will take a copy of the original paperwork and forward this to the HR Department. In the absence of a passport, or if the member of supply staff has a non EEA issued passport, the HoD/Line Manager will liaise with the HoD to establish what appropriate documentation may be seen. In any instance photographic ID will be required to establish identity.

All agency staff will begin their period of employment with an induction. This induction includes health and safety training and, importantly, familiarisation with the School's Child Protection and Safeguarding Policy.



Upon completion of the employment it is the Line Manager's responsibility to complete the necessary paperwork for the employment agency. It is also the Line Manager's responsibility to ensure all property belonging to the School is returned, and to ensure any personal property belonging to the employee is removed from the premises.

To avoid confusion, this process is to be repeated each time a supply member of staff is required, even if they have worked for the School before.

On the occasions that supply staff might become permanent employees for the School, the School will take up their own checks in addition to those already carried out by the agency.

## 2.0 The Use of Contractors within the School

Winchester College recognises that the following will occur from time to time:

- a) **Emergencies.** There is not an expectation for a tradesperson, making repairs, on a 'one off' basis, to have undertaken all National Minimum Standard (NMS) checks which includes an enhanced DBS when coming onto the site. However, this person would need to sign in and out, obtain a visitors badge from the Works Department, Porters' Lodge or Bursary and to be supervised at all times.
- b) **Deliveries.** Will occur to all areas of the site during an average working day and all employees should not give access to any area except when fully supervised and for the actual passing on of the goods. Considered a 'low risk' activity, as there would be no unsupervised access.
- c) **Contractors providing regular or unsupervised services.** No contractor should begin unsupervised regular work at the school until the HR Office has received written confirmation that the regulated recruitment checks have been carried out by either the Agency for a Supply Staff worker or the HR Department for contractors employed directly by the School.
  - i) All Heads of Departments should notify the HR Office of any contractors they wish to bring into the school for regular and/or unsupervised services. As much notice as possible should be given in order to undertake necessary Contractor checks (e.g. enhanced DBS checks, Right to Work and references) prior to commencing work at the School.
  - ii) Contact details should be provided to HR along with:
    - (1) A description of the work the contractor will be undertaking;
    - (2) The anticipated frequency that the contract personnel will visit the School.
  - iii) The HR Office will then contact the contractors to arrange an appointment for the Contractor and any contracting staff within the firm who may attend the site to undertake the appropriate safeguarding checks prior to commencement of work. The following regulatory checks will be undertaken for each individual:
    - (1) The person's identity;
    - (2) Right to work in the UK.
    - (3) Medical fitness for the role (where appropriate);
    - (4) Qualifications (as appropriate to the role);
    - (5) Complete work history, exploring any gaps;

- (6) That the person is not barred from working with children;
  - (7) An Enhanced criminal record check is undertaken with the DBS along with the date that DBS clearance was received;
  - (8) A certificate of good conduct (or similar) obtained for contractors/agency staff who have lived or worked outside of the UK within the last 5 years;
  - (9) A copy of any information disclosed by the DBS **must** be forwarded to the school.
- iv) Once all the regulatory checks have been successfully confirmed with the HR Office, the relevant HoD/Line Manager will be notified and the named individual(s) can commence work, following the relevant induction, ID check and work permit has been issued. No further checks are required.
- d) **Contractors employed on a project basis.** Project work for the school can vary in timeframes, but often involves a number of contractors working either simultaneously or sequentially for the school. All personnel are required to report to the relevant department they have been contracted to on their first visit to the school to complete an induction and the issuing of a visitors badge.
- i) Where the work undertaken is less than four times in a 30 day period, the contractors will be supervised to ensure the safeguarding of pupils, unless either the Contractor has completed all NMS check or work is undertaken on a closed site. Supervision: the supervisor should know where the contractor is at all times and the contractor should be aware that the supervisor is in the vicinity. The contractor should have had the boundaries of their operation clearly defined.
  - ii) Where the work undertaken is four times or more in a 30 day period, the contractors will be supervised to ensure the safeguarding of pupils, with agreement from the HRD, unless the Contractor has completed the full recruitment checks or work is undertaken on a closed site.
  - iii) Where there is a closed site which is defined by the school as an area that is fenced or zoned off and cannot be accessed by pupils or unauthorised members of staff. Access to a closed site should generally be away from pupil areas wherever physically possible to minimise any opportunity for Contractors to interact with pupils. There is no requirement to check Contractor's staff accessing closed site locations. An overview of safeguarding supervision will be discussed and agreed by the Project Manager with the Contractor. All contract personnel will be required to sign in and out of the closed site for Health and Safety regulations.
  - iv) An Open site is where a contractor has potential access to pupils and/or pupil boarding or common areas. Unless contract personnel have completed all the recruitment checks, contract personnel will display visible work permits and be under close supervision of the Project Manager or an alternative nominated member of staff who have completed all the Safeguarding checks.
  - v) The HR Office will maintain the validity of the Contractor records by way of a yearly audit in which they will contact the Contracting company and request information of any employee no longer working for the company, and arrange checks for anyone new that the Contractor may wish to visit the site.

### 3.0 During School Holiday Periods

Maintenance work is often carried out during periods when the pupils are not present at the school especially during holidays. Contractors and Agency staff used throughout these periods are not usually

required to undertake DBS checks as they should have no access to pupils, however the employing department must liaise closely with Enterprises to ensure that any work carried out by unchecked staff does not conflict with any restrictions to access due to the lettings of facilities for children, young persons or people at risk and are protected. In the event that the school has let out its facilities, restrictions (as stated above) will apply to people accessing areas of the school.



## **Recruitment of Ex-offenders Policy**

**Reviewed: September 2021**

**Next Review: September 2024**

**Author: RAC**

**Approved: Senior Management Committee**

### **1.0 Introduction**

The school will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The school makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record, this will not automatically bar him/her from employment within the school. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 2.0 below.

All positions within the school are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except for those to which the DBS filtering rules apply (see section 4.0 below). A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the school to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to attempt to apply for a position at the school. The school will make a report to the Police and/or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application;
- it has serious concerns about an applicant's suitability to work with children.

### **2.0 Assessment Criteria**

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the school will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- The circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence;
- serious Class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted of a serious motoring offence (i.e Drink Driving) within the last ten years.

### **3.0 Assessment Procedure**

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the school will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Headmaster, Bursar or the HRD before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, he/she can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the school will, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

### **4.0 DBS Filtering Rules**

Since 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

#### **For those aged 18 or over at the time of an offence**

An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of conviction;
- it is the person's only offence;
- it did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of "**specified offences**" which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.

A caution received for an offence committed in the United Kingdom when a person was aged 18 or over will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

#### **5.0 For those aged under 18 at the time of an offence**

A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- five and a half years have elapsed since the date of conviction;
- it is the person's only offence;
- it did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of "specified offences", or if a person has more than one offence on their criminal record.

A caution received when a person was aged under 18 for an offence committed in the United Kingdom will not be disclosed if two years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

#### **6.0 The list of "specified offences" which must always be disclosed**

This contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at:

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

#### **7.0 Retention and security of disclosure information**

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.



## Disciplinary Rules and Procedures for All Staff

Reviewed: August 2023

Next Review: September 2024

Author: RAC

Approved: Senior Management Committee

### Disciplinary rules

1. **Introduction:** These rules should be read in accordance with the School's disciplinary procedure. It is the contractual duty of every member of staff to observe the rules set out below.
2. **Safeguarding:** The welfare of children is placed at the centre of the School and its culture and School's policies are designed to ensure that all those who work in the School and may have contact with children are clear on the rules of conduct and the expectations of the School. Children place trust in those connected to the School creating obligations which we must all meet to ensure the successful outcomes achieved by the children in our care.
3. **Rules of conduct:** Whilst employed by the School, you should at all times maintain professional and responsible standards of conduct. In particular, you should:
  - 3.1 observe the terms and conditions of your contract of employment;
  - 3.2 ensure that every pupil feels safe and protected from any form of abuse and actively commit to safeguarding and promoting the welfare of children and young people;
  - 3.3 ensure that you understand and follow the School's Code of Professional Conduct for all Staff (Appendix 1, Child Protection and Safeguarding Policy);
  - 3.4 observe all other policies and procedures included in the Staff Handbook or otherwise notified to you from time to time;
  - 3.5 comply with all reasonable advice given by staff who are senior to you;
  - 3.6 act at all times in good faith and in the best interests of the School, its pupils, parents, guardians or carers and staff;
  - 3.7 uphold public trust in the School and maintain high standards of ethics and behaviour; and
  - 3.8 have an understanding of, and always act within, the statutory frameworks which set out your professional duties and responsibilities.

4. **Instances of misconduct:** The following is a non-exhaustive list of offences which amount to misconduct falling short of gross misconduct:
- 4.1 lateness;
  - 4.2 unauthorised absence from work;
  - 4.3 inappropriate standard of dress;
  - 4.4 smoking on School premises;
  - 4.5 contravention of minor safety regulations; or
  - 4.6 disruptive behaviour.
5. **Gross misconduct:** You must not commit any act of gross misconduct. Any such act may result in your dismissal without notice. Gross misconduct includes but is not limited to the examples set out below, offences of a similar nature and attempts to commit such offences.

Examples of gross misconduct (whether committed at or outside work):

- 5.1 failure to comply with the School's child protection and safeguarding policy and procedures and a failure to commit to safeguarding and promoting the welfare of children and young people;
- 5.2 failure to immediately notify the School of any child protection investigation of you or any member of your household;
- 5.3 failure to immediately notify the School of any investigation, arrest, charge or conviction of any criminal offence brought against you during your employment;
- 5.4 failure to immediately notify the School of any investigation for any allegation of a disciplinary nature at any other employer or organisation at which you are a volunteer;
- 5.5 failure to comply with any of the School's policies and procedures in the Staff Handbook the School's IT acceptable use policy or the School's social media policy;
- 5.6 accepting or giving bribes or other secret payments or other breach of the School's antibribery and corruption policy;
- 5.7 failure to immediately notify the School if you are or become the subject of a referral to or a sanction, restriction or prohibition issued by the Teaching Regulation Agency (previously known as the National College of Teaching and Leadership) or any successor body, or by a regulator of the teaching profession in any other country;
- 5.8 failure to immediately notify the School of any change in circumstances which may or will result in you being disqualified from providing childcare in connection with early or later years provision or from being directly involved in its management;
- 5.9 indecent, violent or offensive behaviour;
- 5.10 inappropriate conduct or communications with a pupil of the School, or a pupil of another school;
- 5.11 misuse of or deliberate damage to School property;



- 5.12 fraud, theft or dishonesty to include giving false information or representations before or during your employment;
- 5.13 failure to obey a lawful order;
- 5.14 gross dereliction of duty;
- 5.15 gross negligence;
- 5.16 being on duty whilst under the influence of drugs and / or alcohol;
- 5.17 possession, use, supply or attempted supply of controlled substances or the sale of any drug or substance (prescribed or not);
- 5.18 actions that could be interpreted as glorifying or supporting terrorism, extremism or organisations promoting terrorist or extremist views, or encouraging others to do so;
- 5.19 bullying or harassment;
- 5.20 conduct which is likely to damage the School's reputation or bring it into disrepute;
- 5.21 discrimination (including harassment or victimisation) and the use of discriminatory language on grounds of sex, sexual orientation, marriage and civil partnership status, gender reassignment, race, religion or belief, pregnancy and maternity, disability or age;
- 5.22 disregarding health and safety rules / requirements (including the School's Health and Safety at Work Rules) and endangering yourself or others;
- 5.23 wilful neglect or refusal of duty;
- 5.24 misuse of information including breach of confidence, misuse of private or confidential information or breach of data protection law. This includes information that is confidential to the School (such as financial information) as well as information about individuals. Such misuse may include accessing or attempting to access information, or sharing or attempting to share it;
- 5.25 viewing, retrieving or downloading of pornographic material, or any other material which the School believes is unsuitable at any time when on School premises or otherwise in the course of your employment;
- 5.26 causing loss, damage or injury through serious negligence;
- 5.27 making a disclosure of false or misleading information under the School's whistleblowing policy for personal gain, or which is not in the public interest; or
- 5.28 making untrue allegations in bad faith against a colleague

## **Disciplinary procedure**

### **Introduction**

1. **Flexibility:** The School will follow a fair procedure in the event that disciplinary action is necessary but this procedure does not have contractual effect. There may be occasions when the School considers it appropriate to change or omit parts of this procedure.

2. **Amendments:** The School may revise this procedure from time to time and will publish any amendments on the Portal.
3. **Capability:** This procedure does not apply to incompetence, incapability or other poor performance unless this is attributable to misconduct.
4. **Record of proceedings:** The School may, at its sole discretion, appoint someone to take notes of any interview or hearing under this procedure. No recordings shall be made without the express approval of all those present at the interview or hearing.

### **The investigation stage**

5. **Investigation:** As a first step any disciplinary issue will be investigated. If, after investigating the matter, it appears that there are no reasonable grounds for concern, you will be informed of this in writing and, if relevant, allowed to return to work as normal.
6. **Suspension:** If the matter to be investigated is thought at any stage of the investigation to involve gross misconduct, or if it is in the interests of the School, a pupil, an employee or you, the Headmaster, Bursar or HR Director may immediately suspend you from work on full pay and benefits whilst the investigation proceeds.
7. **Support and guidance:** The School will notify you of a person to contact during any period of suspension or investigation. You may also wish to seek the advice of your union representative where available.
8. **Separation of roles:** The School will appoint a member of staff or an external consultant to carry out the investigation (**Investigating Officer**).
9. **Interview:** As part of the investigation the Investigating Officer may (if considered appropriate) undertake an interview with you.
10. **Next stage:** If on completion of the investigation the Investigating Officer considers that it is necessary, a disciplinary hearing will be arranged and you will be invited to attend. You must take all reasonable steps to attend the disciplinary hearing.
11. **Information:** You will be given advance reasonable notice of the timing and the location of the hearing. You will be informed in writing of the purpose of the hearing and the allegations against you. You will be provided with a copy of any documents which may be referred to at the Disciplinary Hearing and invited to submit any relevant documents. You will be given a reasonable opportunity, normally 7 calendar days, to consider your response to this information. If your dismissal is a possible outcome of the hearing, you will be informed of this possibility in advance.
12. **Right to be accompanied:** You may be accompanied to the disciplinary hearing by a colleague or a qualified trade union official.
13. **Witnesses:** You may ask relevant witnesses to attend the disciplinary hearing, provided it is reasonable to do so and you give the School sufficient advance notice to arrange their attendance. You will be given the opportunity to respond to any information given by a witness. However, you will not normally be permitted to cross-examine witnesses unless, in exceptional circumstances, the Disciplinary Meeting decides a fair hearing could not be held otherwise.
14. **Witness statements:** If statements have been obtained from witnesses during the course of the investigation you will be given a copy of them. In certain circumstances it may be necessary to preserve the anonymity of a witness.

15. **Disciplinary Officer:** The School will appoint a Disciplinary Officer to hear the matter. The Investigating Officer shall not be a member of the final Disciplinary decision.
16. **The disciplinary hearing:** The hearing will be conducted by the Disciplinary Officer. The Investigating Officer will be asked to report on his / her investigation. Both you, or the person accompanying you, and the Disciplinary Officer may question the Investigating Officer and witnesses on prior agreement. You will be entitled to give your explanation and may be questioned by the Investigating Officer as well as by the Disciplinary Officer. You or the person accompanying you and the Investigating Officer will be given the opportunity to address the Disciplinary Officer. The person accompanying you will not be permitted to respond to questions which are addressed to you.
17. **Adjournment:** The Disciplinary Officer may adjourn the proceedings at any stage if this appears necessary or desirable. You may request an adjournment if you need to consult the person accompanying you. If adjourning for the purpose of enabling further information to be obtained, the Disciplinary Officer will specify the nature of that information. Any adjournment will normally be for a specified period of time.
18. **Decision making:** On completion of the hearing, the Disciplinary Officer will retire to consider the decision. Neither you, the person accompanying you nor the Investigating Officer will be allowed to take part in nor be present during the Disciplinary Officer's deliberations.
19. **Communication of decision:** The decision of the Disciplinary Officer will be communicated to you in writing as soon as reasonably practicable. If the complaint is upheld you will be informed of the action to be taken and your right of appeal.

### **Disciplinary action**

20. **Sanctions:** Depending upon the nature of any misconduct found to have been committed, any explanation given by you and any mitigating circumstances, the Disciplinary Officer may impose any of the following sanctions which need not be in the sequence below:
  - 20.1 a written verbal warning;
  - 20.2 a written warning;
  - 20.3 a final written warning;
  - 20.4 suspension without pay for a defined period;
  - 20.5 demotion;
  - 20.6 dismissal with or without notice.
21. **Currency of warnings:** A written warning will be recorded on your file but will be considered spent for disciplinary purposes after a period of 12 months from the date the warning is given. A final written warning will be recorded on your file but will be considered spent for disciplinary purposes after a period of 24 months from the date the warning is given.
22. **Gross misconduct:** Where there has been gross misconduct the Disciplinary Officer may impose dismissal without notice. Examples of what the School considers to be gross misconduct are set out in the Disciplinary Rules section of this Employment Manual.

### **Appeal**

23. **Right of appeal:** If an employee wishes to appeal against any disciplinary action, he/she should notify the HR Director in writing giving the full and detailed grounds for the appeal within seven calendar days of the disciplinary action being communicated to him/her.
24. **Appeal meeting:** The Appeal Meeting shall not include any member of the first Disciplinary Meeting nor the initial Investigatory Officer and may comprise one or more persons. As far as reasonably practicable the person chairing the Appeal Meeting will be someone holding a more senior position than the person chairing the Disciplinary Meeting.
25. **Appeal procedure:** The procedure at the appeal hearing shall be the same as that for the disciplinary hearing save that there will be no right of appeal from the decision of the Appeal Meeting. You must take all reasonable steps to attend the appeal hearing. The Appeal Meeting will be entitled to reach a different conclusion and impose a different sanction (although not greater) than that imposed by the Disciplinary Meeting. You will be informed of the Appeal Meeting's decision in writing as soon as reasonably practicable.
26. **Right to be accompanied:** You may be accompanied to the appeal hearing by a colleague or trade union official.
27. **Employment status:** If an appeal is made against a dismissal decision, that dismissal decision will have immediate effect so that, if the dismissal is by notice, the period of notice will have begun at the date given in the dismissal decision. If summary dismissal without notice has been imposed, you will not be entitled to be paid for the period between that decision and the decision of your appeal unless you have been reinstated on appeal. If having been dismissed you are reinstated on appeal, your continuity of employment will be unaffected.

### **Termination of employment**

28. All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the whistleblowing policy, the child protection and safeguarding policy and procedures and the Staff Code of Conduct). Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with leavers.
29. **Termination of employment:** If the School ceases to use your services because you are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay. The School may also need to consider a referral to the Disclosure and Barring Service if a member of Staff is suspended, or deployed to another area of work that is not regulated activity.
30. **Resignation:** If you tender your resignation, or cease to provide your services to the School at a time when child protection concerns exist in relation to you, those concerns will still be investigated in full by the School and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.

31. **Teaching Regulation Agency (TRA) (previously known as the National College for Teaching and Leadership):** Separate consideration will also be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he or she not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.



WINCHESTER  
COLLEGE

## Whistleblowing Policy

**Reviewed: August 2021**

**Next Review: August 2024**

**Author: RAC**

**Approved: Senior Management Committee**

The Whistleblowing policy is guided by Lord Nolan's Second Report of the Committee on Standards in Public Life, or the Public Interest Disclosure Act 1998. Employees desiring external advice on whistleblowing should contact the charity Public Concern at Work on Telephone Number: 0207 4046609, [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk).

Staff who do not feel able to raise concerns regarding child protection failures internally may contact the NSPCC whistleblowing helpline Tel: 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### 1.0 Introduction & Purpose

1.1 Winchester College is committed to the highest standards of professional conduct. All staff, including temporary, agency and contract staff, who have serious concerns about any aspect of their work, have a right and duty to come forward and express those concerns without fear of reprisal, victimisation or harassment. In most cases, concerns or complaints will be dealt with through other procedures, such as those for resolving grievances, disciplinary matters or concerns relating to discrimination. However in some cases, it is recognised that staff will want to come forward on a *confidential* basis (whistleblowing). This policy makes it clear that this can be done without fear of reprisal, victimisation or harassment. Disclosures should be made in the public interest.

### 2.0 Consultation and information

2.1 **The school will ensure that every new** member of staff, temporary or permanent, is made aware of all requirements and expectations encoded in the Staff Handbook.

2.2 Staff are protected when they make a disclosure of information which they reasonably believe indicates one or more of the following matters. This list is not exhaustive:

- a criminal offence has been committed, is being committed or likely to be committed;

- a colleague has failed, is failing, or is likely to fail to comply with any legal obligation to which he/she is subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health and safety of any individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- any of these matters has been, is being or is likely to be deliberately concealed.

It should be noted that in making a disclosure the member of staff must have a reasonable belief that the information disclosed shows one or more of the matters listed above. The belief need not be correct but the member of staff must show that he/she held the belief and that it was a reasonable belief in the circumstances at the time of the disclosure.

The only additional requirement on the member of staff is that he/she should act in good faith. The school will not tolerate malicious or vindictive disclosures and if such a disclosure is made the individual(s) involved will be subject to action under disciplinary procedure.

2.3 In addition to the above, the school expects and encourages staff to come forward with disclosures if they suspect:

- fraud, corruption or malpractice;
- failure to deliver approved standards of Child Protection;
- damaging personal conflicts at senior level;
- bullying, discrimination, harassment or victimisation in the workplace;
- serious breaches of the standards set out in the Dons' Handbook or other Code.

2.4 Senior Management notified of a concern will:

- ensure that concerns raised are taken seriously;
- where appropriate, investigate properly and make an objective assessment of the concern;
- keep the member of staff advised of progress;
- ensure that necessary action is taken.

### **3. Confidential reporting**

The law protects employees against unfair dismissal or being subjected to detriment as a result of a protected disclosure. If anyone tries to prevent a member of staff from coming forward to express a concern, this may be treated as a disciplinary offence.

Workers who 'blow the whistle' on wrongdoing in the workplace can claim unfair dismissal if they are dismissed or victimised for doing so. An employee's dismissal (or selection for redundancy) is automatically considered 'unfair' if it is wholly or mainly for making a protected disclosure. From 25th June 2013 if a case goes to a tribunal and the tribunal thinks the disclosure was made in bad faith, it will have the power to reduce compensation by up to 25%.

A worker will have to show three things to claim PIDA protection:

1. that he or she made a disclosure
2. that they followed the correct disclosure procedure
3. that they were dismissed or suffered a detriment as a result of making the disclosure.

#### **4. Whom to contact**

- In most cases, the member of staff should be able to raise any concerns with his/her Head of Department or other Senior Manager. If for some reason this is not possible, an approach should be made to directly to the Director of HR. If necessary, the member of staff should ask for a confidential meeting.
- A member of staff may also in the first instance report a concern to the Director of HR. These concerns should be put in writing and include, if possible, some background, relevant dates and the reason why the situation has caused concern. The recipient of the information will acknowledge the concern within 48 hours. If a meeting or interview is held to discuss the concern, this will usually be done within 14 days. At this meeting, the member of staff raising the matter may be accompanied by a work colleague or a qualified trade union official.
- If staff do not feel able to go to their employer with the disclosure first they should contact a prescribed person or body first. (Guidance is available from [Whistleblowing: list of prescribed people and bodies - GOV.UK](#))

#### **5. Review**

This Policy will be reviewed tri-annually by The Human Resources Director and the Senior Management Committee and updated as appropriate.





## **Child protection and safeguarding training**

**Reviewed: July 2023**

**Author: DSL**

Winchester College is committed to ensuring that their staff are familiar with safeguarding and child protection procedures and are able to implement them in an effective and empathetic manner.

All staff should:

- Understand their role and responsibilities with regard to safeguarding children
- Be familiar with the legal framework that relates to safeguarding children
- Understand the concepts of confidentiality and disclosure
- Be familiar with key policies and procedures
- Be familiar with key definitions, signs and indicators of abuse
- Be familiar with factors that may increase risk to children and families
- Read Part 1 of Keeping Children Safe in Education\*

### **Resources**

Documentation of the safeguarding and child protection policy is available on the School's Information Portal (Wykehampedia). In addition to the School's policies, there are links to national and local documents and online resources available in the same place. Hard copies of the Child Protection and Safeguarding Policy, and its associated policies, are stored in the:

- Porters' Lodge
- Works Department
- Sports Department
- Dons' Common Room
- Music School

A summary of Child Protection contacts and procedures is carried by all members of staff - it appears at the back of Short Roll, which is supplied to all teaching staff, and it is issued as a card that can be stored in a wallet or handbag to all staff.

### **Record keeping**

Copies of all child protection training attendance records are kept in the Bursary and overseen on a database managed by the Human Resources Department.

## Training schedule

### Induction Training for all staff covers:

- Child Protection & Safeguarding Policy
- Duty to report and to whom
- Definitions and signs of abuse
- Staff Code of Conduct
- Behaviour Policy
- Missing from Education
- Whistle-blowing procedures
- Identity of DSL
- KCSIE Part 1\*
- Online Safety
- Risks of Radicalisation

### Headmaster & Governing Body Representative:

- **Initially:** Training provided by the DSL during orientation
- **Triennially:** Comprehensive Training provided by an external provider
- **Annually (and as required):** DSL to brief on changes to policy, practices and legislation.

NB: DSL briefs whole GoBo annually and as required on changes to policy, practices and legislation.

### Housemasters, Matrons, Assistant Housemasters, Nursing Staff:

- **Initially:** Training provided by the DSL during orientation
- **Triennially:** Comprehensive Training provided by an external provider

- **Annually (and as required):** DSL provides regular updates in line with HSCP advice to include Prevent and on-line safety, plus informal updates.

### Designated Safeguarding Lead & Deputy DSL

- **Initially:** DSL initial training provided by Hampshire County Council covers:
  - Interagency working
  - Child Protection Conferences
  - Supporting Children in Need
  - Children at risk of radicalisation
  - Record keeping
  - Promoting a culture of listening
- **Bi-ennially:** refresher training provided by Hampshire County Council or accredited body
- **As required:** Training courses on relevant issues or issues arising including

### Dons:

- **Initially:** Training provided by the DSL during orientation
- **Triennially:** Training provided by an external provider
- **Annually (and as required):** DSL provides regular updates in line with HSCP advice to include Prevent and on-line safety, plus informal updates.

### Administrative & Support Staff, Peripatetic Music Teachers, Sports Staff, Volunteers and Temporary Staff:

- **Initially:** Training provided by the DSL or line manager during orientation

- **Triennially:** Training provided by the DSL include Prevent and on-line safety, plus informal updates.
- **Annually (and as required):** DSL provides regular updates in line with HSCP advice to

**All staff have access to 38 online Child Protection, Health and Safety courses provided by EduCare.**

**\*Staff who do not work directly with children can read either Part one or Annex A (a condensed version of Part one) of this guidance.**



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## Risk Assessment for Visiting Speakers

Reviewed: July 2023

Author: DSL

No	Prevent Vulnerability/Risk Area	Risk Y/N	Action taken/already in place to mitigate/address risk	Owner	When
1	<p><b>Speakers and Events</b></p> <p>Is there an effective policy/framework for managing speaker requests? Is it well communicated to staff/students and complied with?</p> <p>Is there an effective policy/framework for assessing the risks of radicalisation by speakers?</p>	N	<p>The event is approved by the Events Committee the term before the date of the event is published in the School Calendar.</p> <p>Details of the lecture/s are circulated to all dons and pupils prior to the event. Dons with concerns about the speaker or the content of the speech are asked to alert the organising don, who will act accordingly and liaise with the Second Master.</p> <p>There is a supervising staff member who has received Child Protection Training at each lecture. That don will remain for the duration of the presentation and intervene if there is inappropriate action or content. Staff are particularly alert to whether visiting speakers express fundamentalist views, as outlined in the 'Prevent Duty (July 2015)'.</p>	<p>SJB</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p> <p>Reviewed AEH</p> <p>Reviewed AEH</p>	<p>June 2018</p> <p>June 2019</p> <p>June 2020</p> <p>June 2021</p> <p>July 2022</p> <p>July 2023</p>
2	<p><b>Unsupervised Access</b></p> <p>Do visiting speakers have independent access to pupils?</p>	N	<p>Visiting speakers sign in and out of the Porters' Lodge and can be identified as they wear a Visitor's Badge.</p> <p>There is a supervising staff member who has received Child Protection Training at each lecture. That person will escort the speaker to and from the presentation. Speakers are given a 'Visitor's Brochure' that outlines the School's Child Protection Policy.</p>	<p>ECM</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p> <p>Reviewed CPB</p>	<p>Sept 2015</p> <p>June 2018</p> <p>June 2019</p> <p>June 2020</p> <p>June 2021</p>

				Reviewed AEH	July 2022
				Reviewed AEH	July 2023





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## Hampshire Safeguarding Children Partnership Threshold Chart

Reviewed: July 2023

Author: DSL

1 Universal	2 Early Help	3 Targeted Early Help	4 Children's Social Care
<p>Has needs met within universal provision. May need limited intervention within the setting to avoid needs arising.</p> <p><b>Developmental needs</b></p> <ul style="list-style-type: none"> <li>• Achieving learning targets</li> <li>• Good attendance</li> <li>• Meeting developmental milestones</li> <li>• Has psychological well-being</li> <li>• Ability to protect self and be protected</li> </ul>	<p>Has additional needs identified within the setting that can be met within identified resources through a single agency response and partnership working.</p> <p><b>Developmental needs</b></p> <ul style="list-style-type: none"> <li>• Absence/truancy from school</li> <li>• Incidence of absence/missing from home</li> <li>• Use of fixed term exclusions</li> <li>• Risk of social exclusion</li> <li>• Poor attachment</li> <li>• Language and communication difficulties</li> <li>• Reduced access to core needs</li> <li>• Disability or additional special need</li> <li>• Potential for becoming NEET</li> <li>• Potential not to attain</li> <li>• Slow in meeting developmental milestones</li> <li>• Missing health checks/immunisations</li> <li>• Minor health problems</li> <li>• Early signs of offending/antisocial behaviour</li> <li>• Underage sexual activity</li> <li>• Early signs of drug/alcohol misuse</li> <li>• Poor self-esteem</li> <li>• Low level emotional/mental health issues</li> </ul>	<p>Has multiple needs requiring a multi-agency coordinated response.</p> <p><b>Developmental needs</b></p> <ul style="list-style-type: none"> <li>• Despite intervention at 2, there is evidence of continuing:</li> <li>• Persistent absence from school</li> <li>• Missing from school / home regularly with no explanation</li> <li>• Permanent exclusions/no school place</li> <li>• Social exclusion</li> <li>• Poor attachment</li> <li>• No access to core services</li> <li>• Significant disabilities</li> <li>• NEET</li> <li>• Developmental milestones not being met due to persistent parental failure/inability</li> <li>• Chronic/recurring health problems</li> <li>• Regular missed appointments affecting developmental progress</li> <li>• Teenage pregnancy</li> <li>• Drug/alcohol misuse impacting negatively</li> <li>• Risky sexual behaviour (e.g. unprotected sex)</li> <li>• Offending / anti-social behaviour resulting in risk of entering Youth Justice System</li> <li>• Emotional / mental health issues</li> <li>• Community harassment / discrimination</li> </ul>	<p>Has a high level of unmet and complex needs, or is in need of protection.</p> <p><b>Developmental needs</b></p> <ul style="list-style-type: none"> <li>• Persistent/continued/severe:</li> <li>• Chronic persistent absence, permanent exclusions or no school place that risks entry to the care system</li> <li>• Frequently missing from home resulting in self-neglect</li> <li>• Persistent social exclusion</li> <li>• Poor attachment</li> <li>• Complex/multiple disabilities</li> <li>• Teenage parent/pregnancy under the age of 13</li> <li>• Drug/alcohol use severely impairing development</li> <li>• Offending and in the criminal justice system</li> <li>• Complex mental health issues affecting development needs, including self-harm</li> <li>• Very low self-esteem</li> <li>• Non-organic failure to thrive</li> <li>• Sexually inappropriate/aggressive behaviour</li> <li>• Sexual exploitation/abuse</li> <li>• Relationship breakdown</li> <li>• Unaccompanied minors</li> </ul>

<b>Family and environment</b> <ul style="list-style-type: none"> <li>• Supportive relationships</li> <li>• Housed, good diet and kept healthy</li> <li>• Supportive networks</li> <li>• Access to positive activities</li> </ul>	<b>Family and environment</b> <ul style="list-style-type: none"> <li>• Young carers</li> <li>• Poor parent/child relationships</li> <li>• Children of prisoners/parents subject to community orders</li> <li>• Bullying</li> <li>• Poor housing and poor home environment impacting on child's health</li> <li>• Community harassment/discrimination</li> <li>• Low income affects achievement</li> <li>• Parent advice needed to prevent needs escalating</li> <li>• Poor access to core services</li> <li>• Risk of relationship breakdown</li> <li>• Concerns about possible domestic abuse</li> </ul>	<b>Family and environment</b> <ul style="list-style-type: none"> <li>• Housing tenancy at risk</li> <li>• Community harassment/discrimination</li> <li>• Relationship breakdown</li> <li>• Domestic abuse</li> <li>• Transient families</li> </ul>	<b>Family and environment</b> <ul style="list-style-type: none"> <li>• Suspicion of physical, emotional or sexual abuse or neglect</li> <li>• Community harassment/discrimination</li> <li>• Domestic abuse resulting in child being at risk of significant harm</li> <li>• Homeless child/young person</li> <li>• Family intentionally homeless</li> <li>• Extreme poverty affecting child well-being</li> <li>• Force marriage, honour-based violence, female genital mutilation</li> </ul>
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Appendix 13 – Child Protection and Safeguarding Policy

<b>Parents and carers</b> <ul style="list-style-type: none"> <li>• Protected by carers</li> <li>• Secure and caring home</li> <li>• Receive and act on information, advice and guidance</li> <li>• Appropriate boundaries maintained</li> </ul>	<b>Parents and carers</b> <ul style="list-style-type: none"> <li>• Inconsistent care arrangements</li> <li>• Poor supervision by parent/carer</li> <li>• Inconsistent parenting</li> <li>• Poor response to emerging needs</li> <li>• Historic context of parent/carer's own childhood</li> </ul>	<b>Parents and carers</b> <ul style="list-style-type: none"> <li>• Parental learning or physical disability, substance misuse or mental health impacts on parenting</li> <li>• Inconsistent care arrangements</li> <li>• Poor supervision by parent/carer</li> <li>• Poor response to identified needs</li> <li>• Historic context of parent/carer's own childhood</li> </ul>	<b>Parents and carers</b> <ul style="list-style-type: none"> <li>• Edge of care</li> <li>• Parental encouragement of abusive/offending behaviour</li> <li>• Continuing poor supervision in the home</li> <li>• Parental noncompliance/disguised noncompliance or co-operation</li> <li>• Inconsistent parenting affects child's developmental progress</li> <li>• Private fostering</li> </ul>
<b>Next steps</b>  <b>No formal assessment</b>  Go direct to service or see Supporting Families	<b>Next steps</b>  <b>Early help checklist/commencement of early help assessment</b>  Consider early help checklist and commencement of early help assessment. Referral to agency for support to meet identified need. For further advice or guidance contact your local team.	<b>Next steps</b>  <b>Early help assessment and plan</b>  If you require advice or guidance about the child or young person's needs, phone Children's reception team on 0300 555 1381	<b>Next steps</b>  <b>Child and family assessment and plan</b>  Contact Children's Reception team on 0300 555 1381, or police on 999 if at immediate risk.

Available at: <https://www.hampshirescp.org.uk/wp-content/uploads/2019/08/Hampshire-IOW-Thresholds-Chart-July-2019-1.pdf>





## Appendix 14

Keeping Children Safe in Education 2023 can be found [here](#)

Colleagues are asked to read Part 1 and Annex B and confirm to the DSL that they have done so. Colleagues who do not work directly with children are asked to read Annex A and confirm to the DSL that they have done so.