



THE GROVE

INDEPENDENT SCHOOL

Safeguarding Policy

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**Safeguarding Children Policy Whole School
including EYFS.**

This policy must be read annually by all members of staff. The

policy must also be read in conjunction with the staff handbook

This policy is available to parents on the website as well as on request.

The Grove Independent School fully recognises its responsibilities for Safeguarding children / child protection. Safeguarding is everyone's responsibility and **any member of staff can make a referral to children's social care.**

The school always considers the best interests of the child when dealing with safeguarding. The children have daily opportunities with their form tutors to be listened to. The school is always ready if necessary to involve safeguarding agencies by acting on and referring early signs of abuse, neglect and radicalisation.

Staff working with children should maintain an attitude of **'It could happen here'**.

The school ensures that it has adequate filtering systems to keep the children safe when accessing the internet. On line e-safety is taught to the children in their ICT lessons. **All our systems are closely monitored.**

All staff are DBS checked and undergo the 'Safeguarding Course' training provided by the Milton Keynes Safeguarding Children Board (MKSCB) with respect to the 'Keeping Children from Harm' requirement in 'Every Child Matters' as well as 'Working Together to Safeguard Children' 2015 (WTSC). This policy has regard to the Independent Schools Standards Regulations (2014) and 'Keeping children safe in education', Sept 2016 of which all school staff should read part 1.

Induction training for new staff and volunteers also includes the reading of the whistle blowing policy as well as the acceptable use of technologies policy.

All staff should use appropriate language and conduct when addressing the children. No slang or swear words should be used. When addressing

a child or group of children no words or phrases should be used that may humiliate them.

All staff who work directly with the children should read **Annex A** (KCSIE Sept 2016).

Sufficient numbers of relevant staff are trained in safer recruitment processes.

KCSIE incorporates the additional guidance Disqualification under the Childcare Act 2006 (Updated June 2016). KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015).

Working Together to Safeguard Children (March 2015) (WT) refers to the non-statutory advice: Information sharing (March 2015)

Declaration-Disqualification (Safeguarding).

This policy should also read in conjunction with the most recent government statutory guidance concerning safeguarding of children and young people entitled 'Keeping children safe in education: childcare disqualification requirements-supplementary advice dated September 2016.

The guidance advises schools to ask staff to sign a declaration if they do not meet the disqualification criteria set out within the regulations.

This part of the policy applies to all staff working in the school and during the out of school care provision. There are five main elements to our policy:

- Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children.
- This includes not allowing people to work in these settings or to be directly concerned in their management, if they or others in their households are disqualified.
- Other orders have been made to them against them relating to the care of children.
- They have had their registration cancelled in relation to

childcare or children's homes or have been disqualified from private fostering. (Disqualification occurs as soon as the above criteria are met, for example, as soon as a caution or conviction occurs, even before the person is formally included in the children's barred list).

- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting pupils who have been abused in accordance with his/her agreed child protection plan.
- Establishing a safe environment in which children can learn and develop.

In case of serious harm, the police will be informed from the outset

Prevent Strategy

The over-arching legal duty is to **“have due regard to the need to prevent people from being drawn into terrorism”**

There are two key source documents for the Prevent strategy:

Statutory guidance (Home Office)- see paras 1-27 and 57-76 for sector specific guidance for schools.

Advice for schools (Department for Education)

There are 9 main elements to this part of our policy

- **Demonstrate effective leadership** : display an awareness and understanding of the risk of radicalisation in our area; communicate and promote the importance of the Prevent duty to staff; ensure that staff implement the Prevent duty effectively.
- **Train Staff** : ensure that staff understand what radicalisation and extremism mean and why people may be vulnerable to being drawn into terrorism; ensure that staff know where and how to refer children and young people for further help. All staff are to complete their online training as part of their induction at The Grove. This training will then be updated annually. Alongside this there will be regular updates throughout the year during staff meetings and training

sessions. Staff will at least annually complete a questionnaire testing their knowledge.

- **Work in partnership with other agencies** : co-operate productively, in particular with local Prevent co-ordinators, the police and local authorities, and existing multi-agency forums, for example Community Safety Partnerships.
- **Share Information appropriately**: ensure information is shared between organisations and that people at risk receive appropriate support.
- **Risk Assess**: assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- **Build resilience to radicalisation**: promote fundamental British values through curriculum and through social, moral, spiritual and cultural education. Avoid political indoctrination.
- **Safeguard and promote the welfare of children**.
- **Ensure suitability of visiting speakers**: operate clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves are suitable and appropriately supervised.
- **IT policies**: ensure that children are safe from terrorist and extremist material when accessing the internet in school.

Channel guidance

Staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Please refer to [Channel guidance](#).

Vetting Contractors

Arrangements with contractors can take many forms. Some will be in regulated activity and some will not. Paid contractors working in school will not be in regulated activity unless they are working frequently or regularly and have the opportunity to have contact with children. If they are not in a regulated activity, it will not be possible to obtain a check of the children's barred list for them.

If schools experience obtaining checks of the barred list for contractors who are working regularly in school and who do have the opportunity for contact with children, they should provide ISI with precise details of problems encountered to support dialogue with the DfE . This should include information about why they believe the work to be regulated. Pending clarification, we will continue to follow the guidance in paragraphs 85-88 of Keeping Children Safe in Education and note in their records the action they have taken.

We will inform OFSTED, as soon as is reasonably practicable but within 14 days , of any allegations of serious harm or abuse by any person living, working or looking after children at the premises of The Grove Independent School and of the action taken in respect of these allegations.

We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Include opportunities in the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

We will follow the procedures set out by the Local Safeguarding Children Board (MKSCB) and take account of guidance issued by the Department for Education and Skills to:

- Ensure we have a designated senior person (Designated Safe Guarding Lead –DSL For EYFS and School) (Deborah Berkin - Principal) in Deborah Berkin’s absence the Deputy DSL is (Emma Carlin-Deputy Head Pre-Prep) for child protection who has received appropriate training and support for this role for both school and EYFS. (Please refer to KCSIE Sep 16 Annex B for the role of the Designated Safeguarding Lead-DSL)

- Ensure that the training of the DSL is in accordance with locally agreed procedures (Including the LSCB's approach to prevent duties) such that they can provide support and advice to others. The DSL must in addition keep informal supplementary training up-to date at least annually.
- Ensure every member of staff (including temporary and supply staff and volunteers) knows the name of the designated senior person responsible for child protection and their role. (Deborah Berkin- Principal) If the Principal is absent any allegation against a member of staff is made The chairperson of the advisory board Mr Jason Foster.
- If an allegation is made against the Principal, the local authority should be informed straight away.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection.
- Ensure that appropriate child protection checks and procedures apply to any staff employed by another organisation working with the school's pupils on another site.
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- Notify social services if there is an unexplained absence of more than two days of a pupil who is on the child protection register.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, separate from the main pupil file, and in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

- Photos are often required for the children's development folders and we ensure that staff use school owned cameras when taking photos and not their own.
- Following the Serious Case Review from Plymouth Safeguarding Children Board; the use of mobile phones and cameras is not allowed within the whole setting including the EYFS, this covers all visitors (including parents) to the setting not just staff We ensure that all staff leave their Mobile Phones in their vehicles when they arrive at work, or store them in their locker. Staff are only allowed their mobile phones on them during their break in designated areas (The staff room/resources room or off site) with the exception of the fire wardens.

The designated person (Deborah Berkin -Principal) and Deputy DSL (Emma Carlin-Deputy Head-Pre-Prep) are trained at least every two years in child protection and inter-agency working. All staff also complete on- line training annually as well as more detailed safeguarding training every two years. All staff and volunteers are provided with induction training that includes child protection.

All temporary staff and voluntary staff who work with children are to be made aware of the school's arrangements including the identity of the DSL (Deborah Berkin-Principal) and Deputy DSL (Emma Carlin-Deputy Head –Prep Prep). All temporary and voluntary staff must receive updated safeguarding training and have read and understood the most recent update of Part 1 Keeping Children Safe in Education including Annex A.

(This also includes the Schools child protection policy and The staff code of conduct policy).

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self- worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil

through:

- The content of the curriculum.
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil such as children's social services, Child and Adult Mental Health Service, education welfare service and educational psychology service. The latter should lead to inter-agency assessment using local processes such as "Common Assessment Framework" CAF and "Team around the Child" (TAC). Consent is not required for a referral when there are reasonable grounds to believe that the child is at risk from significant harm.
- Ensuring that, where a pupil on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

At The Grove Independent School & Day Nursery our prime responsibility is the welfare of all the children in our care. We believe we have a duty to the children, staff and parents to act professionally and accordingly in any situation that comes to our attention. The Grove has a duty to report any suspicions of abuse to the relevant bodies who then have a duty to investigate them appropriately.

The person responsible for dealing with any child protection issues is the DSL -Deborah Berkin (Principal) who will liaise with child protection agencies and ofsted accordingly.

It is our policy to provide a secure and safe environment for all our children. We aim to:

- Ensure children are never placed at risk whilst in the Groves care.
- Ensure confidentiality is maintained at all times.
- Ensure all staff are familiar with child protection issues and procedures, and training. (If receiving a disclosure staff should avoid asking leading questions to the child and explain that confidentiality cannot be promised)
- Review and update this policy when needed.
- Ensure that staff by their actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil (for example, in one-to one tuition, sports coaching, conveying pupil by car, engaging in inappropriate electronic communication with a pupil)

**ALL STAFF ARE CHECKED BY THE DBS (Disclosure and Barring).
Please refer to the schools recruitment policy for this procedure)**

Visiting Speakers

Visiting speakers are CHECKED AS SUITABLE before they are invited into school. The children are not left without a member of The Grove Staff present with a visitor.

Definition of abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

All staff should have an awareness of safeguarding issues. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should recognise that children are capable of abusing their peers. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

Possible abuse by one or more pupils against another pupil will not be tolerated and should be reported to the DSL immediately. An investigation will take place where all information will be recorded. External Safeguarding Agencies will be informed by the DSL.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Information can be found for example on **TES, MindEd** and **NSPCC** websites

A list of specific safeguarding issues are as follows;

- Cyberbullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation
- Forced marriage
- Gangs and youth crime
- Gender-based violence against women and girls
- Hate crimes
- Mental issues
- Preventing radicalisation
- Sexting
- Trafficking

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. The school should follow its procedures for unauthorised absence and for dealing with children that go

missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in the future.

If a child is found to be injured or there is cause for concern about the child's welfare this will be discussed on most occasions with the parent/carer. In some cases of suspected abuse parents/carers may not always be told first, this is done to provide protection for the child. Our aim is to work alongside parents/carers in an honest and professional manner for the interests and wellbeing of the child. If at any time there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately.

Physical abuse

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

Action will be taken if staff has reason to believe that there has been a physical injury to a child.

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 child that they are worthless or unloved, inadequate or valued only insofar that 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 the child.

Action will be taken if we feel that there is a severe, adverse effect on a child's behaviour or emotional development due to persistent ill

treatment or rejection.

Neglect

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

Action will be taken if we have reason to believe that there has been severe neglect of a child .

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities , not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of the clothing. They may also include non-contact activities, such as involving children 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 (via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Action will be taken if staff have witnessed occasions where a child has indicated sexual activity through words, play, and drawing or has preoccupation with sexual matters or has an inappropriate knowledge of adult sexual behaviour.

Child sexual exploitation (CSE)

Action will be taken here if staff have reason to believe that the child has been involved in exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts money or in some cases simply affection) as a result of engaging in sexual activities.

Female Genital Mutilation (FGM)

Professionals need to be alert to the possibility of a girl being at risk of FGM, or having already suffered FGM. There is a range of potential indicators that a child or young person may be a risk of FGM, which individually may not indicate risk but if there are two or more indicators present could signal a risk to the child or young person. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police

Any instances of female genital mutilation (FGM) SHOULD BE REPORTED DIRECTLY TO THE POLICE personally by the Teacher. For further information, please make reference to the FGM Fact Sheet To be found on P55 of KCSIE Sept 2016.

Forced marriage and so-called honour based violence

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the free and full consent of one or both parties. Threats can be physical or emotional and psychological. Schools can play an important role in safeguarding children from forced marriages.

Radicalisation

Protecting children from the risk of radicalisation should be seen as part of the schools wider safeguarding duties. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- 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;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Children with SEN and disabilities

Children with Special educational needs (SEN) and disabilities can face additional safeguarding challenges. The Grove ensures that additional barriers can exist when recognising abuse and neglect in this group of children, these can include.

- Assumptions that indicators of possible abuse such as

behaviour, mood and injury relate to the child's disability without further exploration.

- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers, and overcoming these difficulties.

Procedure

What should school staff do if they have concerns about a child?

Parental consent is not required.

If staff members have concerns about a child as opposed to them being in immediate danger they need to decide what action to take. There should be where possible a conversation with the DSL to decide a course of action, although any staff member can make a referral to children's social care.

What the school should do if a child is in immediate risk of harm?

If a child is in immediate danger or at risk from harm, a referral should be made to children's social care and or the police immediately. Anyone can make a referral, where referrals are not made by the designated safeguarding lead, the designated safeguarding lead (DSL) should be informed as soon as possible. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about how to do this discuss with the DSL.

What to do if the school has concerns about another member of staff?

If staff members have concern about another member of the staff then this should be referred to The Principal (Deborah Berkin) d.berkin@groveschool.co.uk. When The Principal is also the sole proprietor of the school allegations should be reported directly to the

designated officers at the local authority. LADO

What should a member of staff do if they have concerns about safeguarding practices within the school?

All staff and volunteers should feel able to raise concerns about poor or unsafe practice. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistle blowing channels may be open to them.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 the line is available from 8.00am until 8.00pm, Monday to Friday and email help@nspcc.org.uk.

What the school should do if they have concerns about a child.

Procedure

- Any unexplained marks/bruises etc that are noticed on a child's arrival will be recorded in an incident book and any further injuries also be recorded.
- If staff remains concerned the relevant bodies will be notified.
- If you have a safeguarding concern while changing a child's nappy, clothes or underwear, which you are going to report to the duty social worker or police – You must save the nappy, clothes or underwear and any wipes and gloves used in separate bags labelled with the child's name and the date and time of the change.
- When receiving a disclosure staff should avoid asking leading questions to the child.
- Staff should also explain to the child that confidentiality cannot always be promised.
- Any identified weaknesses or deficiencies in child protection arrangements will be rectified without delay
- Any allegations of abuse by one or more pupils against another will be dealt with in a serious manner. Staff must refer to the anti-bullying policy when dealing with this type of situation.

Allegations against a member of staff –refer to part 4 of KCSIE.

Any allegations against a member of staff will be treated seriously and investigated immediately. Allegations are referred to the LADO for advice before any investigation takes place, in borderline cases these discussions can be held informally and without naming the individual . The LADO will provide presiding advice during an investigation of any allegation or suspicion of abuse directed against anyone working in the school.

Advice will be sought from social services and Ofsted = local authority (LADO) =01908 254306

Please refer to the disciplinary procedure as laid down in the staff contract.

We take child protection issues very seriously. It should be therefore noted that action will be taken against any persons making allegations that are found to be malicious, vexatious or spurious.

Procedure

Action will be taken where it is alleged a member of staff has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they are unsuitable to work with children.

What to do?

MKSCB procedures – Allegations against staff, chapter 13 carers and volunteers.

- Allegations should be made to the DSL (Deborah Berkin - Principal)
- A referral will be made to the Local Authority & Designates officer for all allegations against staff as soon as possible but within 24 hours by the DSL (Deborah Berkin- Principal) to LADO directly on 01908 254300. If Deborah Berkin is unavailable, the

allegation should be reported to the chairperson of the advisory board - (Jason Foster)

- If the allegation is against Deborah Berkin –Principal and Proprietor the allegation should be reported to the LADO.
- Ofsted will be immediately notified of the referral and allegation.
- The member of staff will be suspended pending the investigation.
- Any safeguarding issues will be dealt with by a member of the leadership team or a safeguarding officer and treated with sensitivity and confidentiality.
- Disciplinary action against the alleged member of staff may follow.
- Substantiated allegations will be referred to the DBS.
- Ofsted will be notified of the outcome of any investigation.

Offenders

The school will provide a report to be promptly sent to the Disclosure and Barring Service (DBS) if the school dispenses with a person's services because of their unsuitability to work with children.

The school is committed to make a referral to The National College for Teaching and Leadership (NCTL) where a teacher has been dismissed or would have been dismissed had he or she not resigned.

Safeguarding Children - Useful Numbers

DUTY SOCIAL WORKERS

01908 253169

01908 253170

Out of Hours - 01908 265545

LOCAL AUTHORITY DESIGNATED OFFICER (LADO) –JO CLIFFORD

01908 254300

Lado@Milton-keynes.gov.uk

LOCAL PREVENT CO-ORDINATORS

MK MASH 01908 253169

MKSCBtraining@milton-keynes.gov.uk

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Updated April 2018

MKSCB

(Milton Keynes Safeguarding Children's Board)

(mkscb.org)

01908 254373

NSPCC

0800 800 500

NSPCC

Whistle blowing 08000280285

help@nspcc.org.uk

OFSTED

03001 231231

POLICE

101

www.police.co.uk/101

ADVISORY BOARD CHAIR

Jason Foster

advisoryboardchair@groveschool.co.uk

The policy will be made available to parents upon request.

This policy, the content and implementation will be reviewed by the Proprietor and advisory board annually. Staff with safeguarding experience may contribute to the writing of the policy.

Policy to be reviewed Sept 2018