



## Kensington Wade Safeguarding Policy

September 2022

### Contents

1. Introduction
  2. What To Do If You Have a Concern About a Child
  3. Key Contacts
  4. Statement of Intent
  5. Aims
  6. Definitions of safeguarding and types and signs of abuse
  7. Responding to Safeguarding and Child Protection Concerns
  8. Arrangements for Dealing with Child-on-child Allegations (including sexting)
  9. Arrangements for Dealing with Allegations of Abuse against Teachers and other Staff (including the head, governors and volunteers)
  10. Whistleblowing
  11. Intimate Care
  12. Safer Recruitment
  13. Management of Safeguarding
  14. Low Level Concerns
  15. Designated Safeguarding Lead
  16. Training
  17. Monitoring
  18. Other Safeguarding Responsibilities and Procedures
  19. Early Years Provision Safeguarding Arrangements
- 
- |              |                                                      |
|--------------|------------------------------------------------------|
| Appendix 1:  | Signs And Types of Abuse                             |
| Appendix 2:  | Role Of Designated Safeguarding Lead                 |
| Appendix 3:  | Responding To Suspicions of Abuse                    |
| Appendix 4:  | Liaison With Other Bodies/Responses to Referrals     |
| Appendix 5:  | Recruitment Of Staff, Volunteers and Other Workers   |
| Appendix 6:  | Whistleblowing Policy                                |
| Appendix 7:  | Online Safety                                        |
| Appendix 8:  | Covid-19                                             |
| Appendix 9:  | Summary Safeguarding And Child Protection Procedures |
| Appendix 10: | Concern Form                                         |

### 1. Introduction

This policy applies to the whole school (staff - permanent, temporary, supply teachers - and contractors and volunteers). Adherence to this policy is mandatory. The policy is available to all parents, staff and volunteers on the school website and a paper copy is available from the office on request. The policy is used in accordance with the locally-agreed inter-agency

procedures, specifically those of the **Local Safeguarding Children Board** for Hammersmith and Fulham, Kensington and Chelsea.

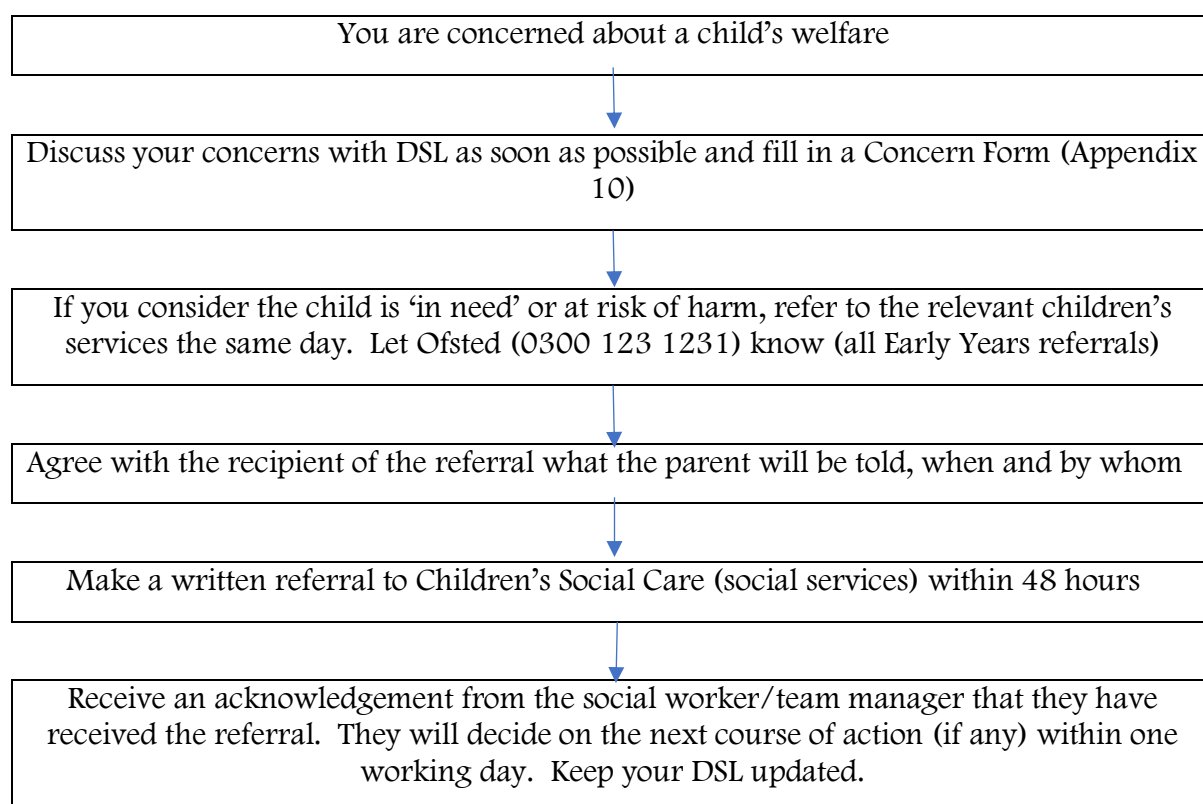
## 2. What to do if you have a Concern about a Child

The school has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.

Staff should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

The school has arrangements for listening to children and providing early help. Our school procedures for safeguarding children comply with Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2022 and are in accordance with locally agreed inter-agency procedures and in line with the London Child Protection Procedures ([londoncp.co.uk](http://londoncp.co.uk)) under the auspices of the LSCB. Details of the school's specific arrangements can be found below (section 3). This policy recognises the requirement to encourage respect for other people, and not to discriminate against pupils with particular regard to the protected characteristics under the Equality Act 2010.

### FLOW CHART OF WHAT TO DO IF YOU HAVE A CONCERN



### 3. Key External Contact Details

<b>Local Authority Designated Officer</b>	TEL: 020 8753 5125 EMAIL: <a href="mailto:LADO@lbhf.gov.uk">LADO@lbhf.gov.uk</a>
<b>Local Authority Contacts</b>	ICAT Initial Consultation and Advice Team TEL: 020 8753 6600 Out of Hours: 020 8748 8588 EMAIL: <a href="mailto:familyservices@lbhf.gov.uk">familyservices@lbhf.gov.uk</a>
<b>Police</b>	<b>Police</b> TEL: 101 31 Fulham Palace Road, W6 8AU EMERGENCY: 999
<b>Support and Advice about Extremism</b>	<b>Local Authority</b> Hammersmith and Fulham, Kensington and Chelsea Prevent Team Prevent Education Officer: Simone Torry <a href="mailto:simone.torry@lbhf.gov.uk">simone.torry@lbhf.gov.uk</a> 07754 222610  EMAIL: <a href="mailto:prevent@lbhf.gov.uk">prevent@lbhf.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> NSPCC website
<b>Disclosure and Barring Service</b>	ADDRESS: PO Box 3961, Wootton Bassett SN4 4HF TEL: 0300 0200 190 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
<b>Department for Education</b>	Helpline for staff and governors TEL: 020 7340 7264 EMAIL: <a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 3155 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>

#### Key School Contact Details

<b>Proprietors</b>	Chairman of Executive Board Professor Hugo de Burgh EMAIL: <a href="mailto:chairman@kensingtonwade.com">chairman@kensingtonwade.com</a>
<b>Governor Responsible for Safeguarding</b>	Mr Chris Skelton <a href="mailto:cskelton@newlandhouse.net">cskelton@newlandhouse.net</a>
<b>Designated Safeguarding Leads (DSL)</b>	<b>Whole school DSL (including EYFS)</b> Mrs Joanna Wallace TEL: 020 3096 2888 MOB: 0737 8142903 EMAIL: <a href="mailto:head@kensingtonwade.com">head@kensingtonwade.com</a> By letter to The Head, Kensington Wade, Fulham Palace Road, London W6 9ER

	<b>Whole school Deputy DSLs</b> Ms Jing Wang TEL: 020 3096 2888 EMAIL: <a href="mailto:j.wang@kensingtonwade.com">j.wang@kensingtonwade.com</a>  Ms Mary-Anne Malloy TEL: 020 3096 2888 EMAIL: <a href="mailto:m.malloy@kensingtonwade.com">m.malloy@kensingtonwade.com</a>
<b>SEND/Inclusion Lead</b>	Ms Marlo Kinnear TEL: 020 3096 2888 EMAIL: <a href="mailto:m.kinnear@kensingtonwade.com">m.kinnear@kensingtonwade.com</a>

The school's overarching Designated Safeguarding Lead (Lead DSL) is **Joanna Wallace**, Principal of Kensington Wade. She is responsible for the implementation of this policy and for the employment of staff alongside the Deputy Heads (**Jing Wang and Mary-Anne Malloy**). Alja Kranjec manages the central record of employment. See Staff Recruitment Policy for further information. The Head works closely with the Proprietors of the school and reports to the Principal, Proprietors and the School Governing Body on all matters including safeguarding.

Joanna Wallace includes in her brief explicit responsibility for matters relating to after-school care and holiday clubs, where such activities are out of school term time as well as ensuring that the Preventing Radicalisation Policy is understood and implemented throughout the school.

The Governor with specific responsibility for safeguarding is **Chris Skelton**. He receives identical training to the school DSLs. The training of all DSLs includes higher-level safeguarding, inter-agency working and the Prevent strategy.

#### 4. Statement of Intent

The proprietors, governors and staff of Kensington Wade fully recognise the responsibilities they have to safeguard and promote the welfare of children who are pupils at the School, including the EYFS, which complies with the Department for Education (DfE) Keeping Children Safe in Education (KCSiE 2022) - statutory guidance for schools and colleges - and has regard to Working Together to Safeguard Children (2018) (WTTSC). To this effect, the school ensures that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare and that the school's safeguarding arrangements reflect the policies and processes of **Local Safeguarding Children Partnership** for Hammersmith and Fulham.

The welfare of pupils at Kensington Wade is safeguarded and promoted by the drawing up and effective implementation of the school's written risk assessment policies and with appropriate action taken to reduce risks that are identified. We recognise specifically the particular vulnerabilities of children with SEND to abuse. Children with special educational needs (SEN) and disabilities and those with mental health problems can face additional safeguarding challenges and we recognise that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury

relate to the child's disability without further exploration;

- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Safeguarding and promoting the welfare of children is everyone's responsibility. No single professional can have a full picture of a child's needs and circumstances. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing and kept as a confidential record. More information in Appendix 3, 9 and 10. Providing early help is more effective in promoting the welfare of children than reacting later. 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 older years. Early help can also prevent further problems arising. Whilst all staff can contribute to early help, such early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child. More can be found on early help on page 10.

To ensure effective management of this and related policies and its implementation, we invite an annual independent external scrutiny of our work in Safeguarding and Child Protection, and that scrutiny includes compilation of an annual report to the governors and also reports on the efficiency with which the related duties have been discharged. Governors take action to ensure that any deficiencies or weakness in safeguarding/child protection arrangements as identified by these reports (or for any other reason) are remedied without delay.

This policy applies to all employed members of staff, including supply staff, contractors and volunteers and governors who have regular access to the school, and are listed as such on our central register of employment. The categories of staff include full and part time staff of all categories, peripatetic music and other visiting staff who are self-employed and those volunteers who also are included as regular in attendance at school. Adherence to this policy is mandatory and applies whenever staff are working with pupils. The Head takes a proportional risk-based approach to the level of information that is provided to temporary staff and volunteers and is guided by both well-trained Deputy Heads and independent safeguarding visitors who check our procedures. The policy also includes guidance on procedures when a member of staff, volunteer, Designated Person for safeguarding and child protection (DSL), Head or one of the Executive Board or Governing Body faces allegations of abuse.

This Policy will be reviewed annually or more frequently in the case of a significant change in any relevant legislation or regulatory guidance. The school recognises the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. Staff contribute to and shape safeguarding arrangements and the child protection policy, these being standing items on the regular weekly staff meetings.

This policy applies to Kensington Wade School which includes the EYFS setting. This policy is reviewed and updated annually and is available on the School website.

This policy has regard to the following guidance and advice:

- [Keeping Children Safe In Education](#) (September 2022) ('KCSIE')
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- [Working Together to Safeguard Children](#) (July 2018)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- [Revised Prevent Duty Guidance for England and Wales](#) (July 2015)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - [The use of social media for on-line radicalisation](#) (July 2015)
  - Use of Reasonable Force in Schools (July 2013)
  - Preventing and Tackling Bullying (July 2017)
  - Mental Health and Behaviour in Schools November 2018
  - Relationships Education, Relationships and Sex Education (RSE) and Health Education September 2020
  - The Education Acts
  - Safeguarding Vulnerable Groups Act 2006
  - Protection of Freedom Act 2012
  - The Children's Act 2004

This policy also takes into account the London Safeguarding Children Protection Procedures (March 2022 – updated every 6 months)

<https://www.londonsafeguardingchildrenprocedures.co.uk/>

**Relevant Policies/Procedures:** *Preventing Radicalisation, Prevent Duty Risk Assessment and Action Plan, Safer Recruitment, Managing Allegations against Staff and Whistleblowing, Promoting British Values from EYFS to KS2, E-safety, Code of Conduct for all Staff, ICT Code of Conduct, COVID-19, Fire, Health and Safety, Critical Incident, Risk Assessment, EYFS Registers and Attendance and Child Missing from Education, Anti-bullying, Rewards and Sanctions, Tutoring and Babysitting, Intimate and Personal Care, Use of Force to Control or Restrain Pupils, Data Protection, Educational Visits*

## 5. Aims

Our aims at Kensington Wade are to:

- To support the child's development in ways that will foster security, confidence and independence;
- To always act in the best interests of the child;
- To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse;
- To develop and promote effective working relationships with other agencies, including Police Liaison and Children's Services;
- To develop a culture of awareness of the types of behaviour a child might manifest that would suggest they are at risk of harm;

- To ensure all staff understand the need for rapid response to any concern, including immediate contact with the Bi-Borough Safeguarding & Child Protection in School and Education Officer depending on the need;
- To provide a systematic means of monitoring children known or thought to be at risk of harm as agreed with the Bi-Borough Safeguarding & Child Protection in School and Education Officer;
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse;
- To emphasise the need for good levels of communication between all members of staff;
- To ensure that all adults within our school who have access to children have been checked as to their suitability;
- To create an environment in the School which encourages children to develop a positive self-image, regardless of race, language, religion, culture or home background;
- To work with parents to build their understanding of, and commitment to, the welfare of all our children;
- To help children to establish and sustain satisfying relationships within their families, with peers, and with other adults;
- To encourage children to develop a sense of autonomy and independence;
- To enable children to have the self-confidence and the vocabulary to resist inappropriate approaches;
- To give the children the right help at the right time to address risks and prevent issues escalating;
- To specifically raise children's awareness of the benefits and dangers inherent with computer activities, associated technologies and online working; and
- To ensure that everyone within our school establishment recognise our duties not only to children at risk of significant harm, but also to children in need. It is not necessary for schools to use the legal phrase "child in need"; to show an understanding that our role includes recognising when a child needs support, preventing problems escalating and working with external agencies to this end if that is what is called for.

## **6. Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. The school recognises that both mental and physical health are relevant to the safeguarding and welfare of children.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse

- emotional abuse
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

## **Mental Health**

All staff should be aware that mental health problems can be an indicator that a child has or is at risk of suffering abuse, neglect or exploitation.

## **Child-on-child abuse**

Children can abuse other children (often referred to as child-on-child abuse). It can happen both inside and outside of school or college and online. All staff should recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff must challenge abusive behaviours between peers. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

## **Contextual Safeguarding**

At Kensington Wade we recognise the importance and value of Contextual Safeguarding and consider this when referring concerns to children's social care.

Contextual Safeguarding can be defined as an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

We therefore support our Local Authority in engaging with different sectors to establish the best outcomes for our pupils, and we train our staff through internal measures to support them in recognising how social contexts can have such an impact on vulnerable children.

### **7. Responding to Safeguarding and Child Protection Concerns**

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

All staff should:

- listen carefully
- avoid asking leading questions
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- reassure victims that they are being taken seriously and that they will be supported and kept safe
- a victim should never be given the impression that they are creating a problem
- a victim should never be made to feel ashamed

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. Where there is a concern the school will keep a separate file for each child, containing a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome. The school has a dedicated Safeguarding concern form (Appendix 10) which staff are trained to fill in in the event of a safeguarding concern. The form records the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure will be managed with two members of staff present (one of them being the Designated Safeguarding Lead or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School operates its processes with the best interests of the pupil at their heart.

## **Early Help**

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

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 later years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the local authority safeguarding arrangements. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **What staff should do if they have concerns about a child**

If staff (including governors, agency staff, contractors and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the school's DSL to agree a course of action although staff can make a direct referral to the local authority. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

If staff (including volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to the local authority and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism. This may include a referral to Channel or the local Prevent team depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from the local prevent team.

The school, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments following consultation with local partners, such as the local Prevent Team Leader and our own Safeguarding internal audit, of the potential risk in the local area. Such risk assessments are shared with the chair of the Executive Board, DSL and DDSLs and the local safeguarding and prevent teams, to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education can also be found at Appendix 1 of this policy.

The School will report to the relevant local authority a pupil who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more.

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

<b>Against</b>	<b>Should be reported to</b>
Staff, volunteers	Head*
Lead DSL/Head	Chris Skelton, Governor with responsibility for Safeguarding, then to LADO (without informing the Head)

\*In the absence of the Head, the allegation should be passed to the Deputy Head, DDSL. The Head will always be kept informed of any allegations against staff or volunteers working at school.

Where there is a conflict of interest in reporting the matter to the head, staff should report directly to the LADO.

Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

The School will adhere to the statutory guidance on dealing with allegations of abuse in force at the time, with any further action - including investigation - taken only with the agreement of the LADO or Duty Social Worker. The following key principles apply:-

- We will consider and thoroughly investigate any allegation expeditiously, fairly and consistently, avoiding all unnecessary delays. The aim will always be to ensure a quick resolution to the benefit of all concerned; the nature, seriousness and complexity of the allegation will have a bearing on timescales.
- In the first instance, and always prior to any internal investigation taking place, the School will contact the LADO at LBHF for further professional advice and discussion within one working day. We will discuss with the LADO the content and context of the allegation and will agree a course of action, including any involvement with the Police. Discussions will be recorded in writing and communication with both the individual and parents of the child/children agreed. For the avoidance of doubt, the School does not require parental consent before reporting allegations to the LADO.
- In the case of serious harm, the Police will be informed from the outset.
- Where appropriate, the person who is subject of an allegation will be notified as soon as is practicable and will be provided with as much information as possible at that time (NB: in some instances the school may not be permitted to disclose full details).
- Suspension will never be a default option; the school will always consider whether the circumstances warrant suspension and/or reasonable alternative arrangements (such as redeployment or working under supervision) are appropriate before a final decision is given in this regard. The LADO's views will always be taken into consideration. The individual will be notified of the reasons and justification for suspension and provided with a named contact within one working day. The school will not conduct an investigation before reporting the case to the LADO.
- Allegations that are found to have been malicious will be removed from personnel records. We will not refer to any unsubstantiated, unfounded or malicious allegations in employer references. (Pupils making malicious allegations will be dealt with under the School's behaviour policy.)
- Whilst care will be taken to ensure the effective protection of the child making the allegation, we will always provide appropriate support to the person who is the subject of the allegation.
- There are restrictions on the reporting or publishing of allegations against staff and the School will take all reasonable steps to ensure that confidentiality is maintained and guard against unwanted publicity while an allegation is being investigated. These restrictions apply up to the point where the accused is charged with an offence, or the DfE publish information about an investigation or decision in a disciplinary case.

- If the subject of an allegation chooses to resign their employ, the school will continue with its investigation and will make every effort to reach a conclusion regardless of whether the individual chooses to assist the investigation.

### **What staff should do if they have concerns about safeguarding practices in the school**

The school aims to ensure there is a culture of safety and raising concerns and an attitude of ‘it could happen here’. Where staff have concerns about poor or unsafe practices and potential failures in the school’s safeguarding systems, these should be raised in accordance with the school’s whistleblowing procedures. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **8. Arrangements for Dealing with Child-on-child Allegations (including sexting)**

Child-on-child abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying, physical abuse, sexting, sexual assault, gender-based issues, hazing and initiation rituals, upskirting, harmful sexual behaviours including sexual violence and sexual harassment, causing someone to engage in sexual activity without consent and abuse in intimate personal relationships between peers. The school takes a zero-tolerance approach to abuse (see page 8 of this policy for more detail). Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. The school recognises that it is more likely that girls will be victims and boy’s perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. The school also recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust and will be taken seriously.

The School recognises that children with special educational needs and disabilities and mental health issues can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for those children. The school takes the following steps to minimise the risk of child-on-child abuse:

- Pastoral care team posters showing children who they can talk to if they have any worries.
- Fostering a culture of openness, positive relationships and taking time to listen.
- Pupil questionnaires and use of worry boxes.
- Safeguarding themed assemblies and lessons (see PSHE and Relationships Education policies).
- Visits from NSPCC with their ‘Speak out Stay safe programme.

Allegations of child-on-child abuse should be recorded on the concern form (Appendix 10) and reported to the DSL immediately (within 24hrs of allegations being made). Where an issue of pupil behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, then this becomes a safeguarding issue and staff should follow the procedures below rather than the school’s Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the safeguarding arrangements put in place by the Local Authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the Local Authority, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the Local Authority team and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. FGM, rape, assault by penetration and sexual assaults will be passed to the police. Advice is sought from the sexual harassment and sexual violence document linked in KCSIE. If the DSL decides to make a referral to the local authority and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. It is clear to all staff that anyone can make a referral and does not require parental consent in the child is deemed at significant risk of harm.

The school's approach to sexting follows our guidance to all sexual harassment allegations. The definition of sexting: 'Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages' (NSPCC website).

It is against the law for a child to: take an explicit picture of another child, to share or store or even download that image, regardless of whether there is consent from the person being photographed. Therefore, all aspects of sexting will be reported to the police, and the police will decide if it becomes a criminal offence or not. The school supports all parties in this matter and appropriate sanctions are put in place in accordance with the behaviour and rewards and sanctions policies.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the school in line with our pastoral care provision, and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator(s); and
- the other children (and, if appropriate, staff) at the school.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The

DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

### **Racist Incidents**

The school acknowledges that repeated racist incidents or a single serious incident may lead to consideration under Safeguarding and Child Protection procedures.

### **Serious Violence**

Staff are aware of the indicators of serious violence and procedures to deal with such incidents.

Indicators of serious violence include:

- Marks on the body
- Poor attendance/punctuality
- Looking for new groups of friends/older friends
- Change in attitude and appearance
- New possessions

All staff are aware of the associated risks and understand the measures in place to manage these issues. Further advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#)

### **9. Arrangements for Dealing with Allegations of Abuse against Teachers and other Staff (including the head, governors and volunteers)**

The School's procedures for managing allegations against staff who are currently working in the school follows Department for Education statutory , Part 4 of KCSiE and multi-agency safeguarding arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the school, the school should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head/DSL. If an allegation is reported to the DSL, the DSL will keep the Proprietors and the Governor with responsibility for Safeguarding informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to Chris Skelton, the Governor with responsibility for Safeguarding. Where the Head/DSL is the subject of the allegation or concern, the Head/DSL must not be informed of the allegation prior to contact with the school proprietor. If the allegation is about the Proprietor the LADO must be contacted. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The school has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the school must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future.

The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

The school's staff code of conduct aims to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of an allegation of harm to a pupil.

Staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the Head, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. See Low Level Concern Policy for more information.

## 10. Whistleblowing

The School aims to create and maintain an environment where staff feel supported in their safeguarding role and able to raise concerns, including about poor or unsafe practice and potential failures in the School's safeguarding regime. The School has a separate Managing Allegations against Staff and Whistleblowing policy shown within the staff handbook; a copy may also be requested from the Head. All staff are required to report to the DSL/Head or to a DDSL in the Head's absence, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. See Appendix 6 for more information. Further Government advice on whistleblowing can be found here - <https://www.gov.uk/whistleblowing>.

## 11. Intimate Care

As a school, we are aware that in some circumstances staff may need to provide intimate care for children. Intimate care includes hands on physical care in personal hygiene, and physical presence or observation during such activities. Parents give written permission for their child to receive intimate care when necessary. Intimate care tasks can include:

- Body bathing other than to arms, face and legs below the knee
- Toileting, wiping and care in the genital and anal areas
- Dressing and undressing
- Application of medical treatment, other than to arms, face and legs below the knee
- Supporting with the changing of sanitary protection

In addition to this there are other vulnerable groups of children and young people that may require support with personal care on either a short, longer term or permanent basis due to SEN and disability, medical needs or a temporary impairment. This could include:

- children and young people with limbs in plaster
- children and young people needing wheelchair support
- children and young people with pervasive medical conditions

When carrying out intimate care, staff should follow the following procedure:

- consider if a child soils themselves then what additional support may the child and staff need
- involve the child as far as possible in his or her own intimate care, taking into account the age of the child and the nature of the incident
- inform parents of the incident
- ensure other staff are aware of the task being undertaken and if possible have another member of staff in attendance
- ensure the adult who is going to change the child informs another member of staff that they are going to do this
- any soiled clothing to be wrapped securely and returned to the parents or disposed of appropriately
- children should be treated with dignity and respect and given privacy appropriate to the child's age and situation

- provide facilities which afford privacy and modesty

More information is detailed in the Intimate and Personal Care Policy found in the Staff Handbook and available on request.

## **12. Safer Recruitment**

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the school may undertake an online update check through the DBS Update Service. More detail can be found in the Safer Recruitment Policy in the Staff Handbook and available on request.

### **Melcombe Primary School**

We exchange assurances with the SLT at Melcombe Primary School about safer recruitment procedures and the admissions of visitors, contractors as volunteers, sharing our practice as laid out above.

## **13. Management of Safeguarding**

The school's DSL is the Head, Mrs Joanna Wallace. The DSL contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school through maintaining an overview of safeguarding within the school, to open channels of communication to allow for sharing of information between and within local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL works with the Governor for Responsibility for Safeguarding to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt with support from the school administrator.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the emergency contact is Joanna Wallace.

Full details of the DSL's role can be found at Annex C of *KCSIE* and more detail can be found in Appendix 2.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

#### 14. Low Level Concerns

##### Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see chart below), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

#### Clarity around Allegation vs. Low-Level Concern vs Appropriate Conduct

##### Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child 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 may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

##### Low Level Concern

Any concern, no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with Kensington Wade's Code of Conduct for all Staff, and/or
- relates to their conduct outside work, which even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

### **Reporting low-level concerns**

Where a low-level concern has been identified, this will be reported as soon as possible to the Head. However, it is never too late to share a low-level concern if this has not already happened.

Where the Head is not available, the information will be reported to the Deputy Designated Safeguarding Lead, i.e. the most senior member of SLT acting in this role.

Low-level concerns about the Head will be reported to the Chair of Governors.

Where the low-level concern has been reported to the Deputy Designated Safeguarding Lead, they will inform the Head of the details as soon as possible.

### **Recording concerns**

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated.

### **Responding to low-level concerns**

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also be sought)

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Code of Conduct for all Staff: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice will be sought.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice sought. In this case the school's Code of Contact for all Staff, the Safeguarding Policy and the Capability, Disciplinary and Grievance Policy will be followed.

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

#### **Can the reporting person remain anonymous?**

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

#### **Should staff report concerns about themselves (i.e. self-report)?**

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for all Staff. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

#### **Where behaviour is consistent with the Code of Conduct for all Staff**

Feedback will be given to both parties to explain why the behaviour was consistent with the Code of Conduct for all Staff.

#### **Should the low-level concerns file be reviewed?**

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

#### **Melcombe Primary School**

As noted in the Whistleblowing Policy, there is a mutual understanding of the need to report concerns which may be observed relating to Melcombe Primary School.

#### **References**

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

#### **What is the role of the Governors?**

The Head will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately

### **15. DSLs**

The DSL and DDSs receive updated level 3 child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LA's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs are trained to the same level as the DSL.

## 16. Training

Induction and training are in line with advice from *LBHF* and the relevant safeguarding organisations.

### All Staff

All new staff will be provided with induction training that includes:

- the child protection policy;
- the role and identity of the DSL(s)
- the behaviour policy
- the staff code of conduct including the whistleblowing procedure and the acceptable use of I.T. policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of *KCSIE 2022*
- School leaders and staff who work directly with children will be required to read *KCSIE 2022*.

Copies of the above documents are provided to all staff during induction. If there are circumstances which mean we cannot give him/her a copy of *KCSIE* (Part One) to read (for example by way of language or lack of literacy) we ensure that they understand the key information, especially by offering Annex A. This may only happen where the risk assessment on appointment identifies them as not being 'workers with children'; for further information, please contact the Lead DSL.

Temporary staff and volunteers are provided with relevant information.

All staff are also required to:

- Read *KCSIE* and confirm that they have done so. Each time Part One/Annex A of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via an oral communication/presentation by the lead DSL and relevant links to the changes for their own reading.
- Understand key information contained in Part One/Annex A of *KCSIE*. The school will ensure staff understanding by explaining all aspects of the documents that are relevant, and hold workshops for staff to voluntarily join should they have any further questions.
- Receive training in safeguarding and child protection (including online safety) regularly, in line with advice from the multi-agency safeguarding arrangements from *LBHF*. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online safety. The school provides these via, for example emails, staff meetings and discussions.

## 17. Monitoring

Joanna Wallace is the Principal and Mr Chris Skelton is the governor-level designate to take a lead in relation to responsibility for the safeguarding arrangements in the School.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. There is an annual audit which takes place using the DfE regulatory requirements, with all DSLs present. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

## 18. Other Safeguarding Responsibilities and Procedures

### Teaching children how to keep safe

The Head ensures that all pupils are taught about safeguarding, including online, through the curriculum to help children to adjust their behaviour in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the school's Computing, PSHE and Relationship Education curricula.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**commerce:** ~ risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and

help manage online behaviour that can increase a child's likelihood of or causes harm. Further details of the school's approach to online safety can be found in the Acceptable use of ICT policy and the school's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the school's systems. See separate e-safety policy.

### **Looked after children**

The Head ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Joanna Wallace is the designated member of staff who has responsibility for their welfare and progress. The school ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the school and British Values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the school, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

## **19. Early Years Provision Safeguarding Arrangements**

This policy applies to the school's provision for the Early Years Foundation Stage. All EYFS staff are expected to adhere to the ICT Use Agreement in the use of mobile phones and cameras, i.e. that images of pupils may not be taken or stored on personal devices. No personal phones are allowed in the EYFS setting.

### **Disqualification from working in childcare**

Where staff work in, or are involved in, the management of the school's early years or provision of care of pupils under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. This forms part of the school's safer recruitment practices, further details of which can be found in the school's Safer Recruitment policy.

The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

### **Use of mobile phones and cameras in school**

Personal mobile 'phones should not be used in any area used by children. The only child-free place where personal mobile 'phones can be used are the school office. Staff sign a code of conduct to agree to this and any breach is regarded as a disciplinary offence.

Parents are asked to sign a permission slip for their children to be photographed taking part in school activities and whether they can be used on the school website and social media accounts. Parents are reminded of their responsibilities when taking photographs in school as to appropriate use of such photographs.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school organised activities with the prior consent of the School. Images taken must be for private use only and not shared via social media or internet sharing sites. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Joanna Wallace.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises whether the allegations relate to harm or abuse committed on the premises or elsewhere.

Joanna Wallace

Last review date: 12 April 2023

Previous review: 24 June 2022

Next review by September 2023, or as directed by primary legislation prior to review date.

## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

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

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

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

**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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media;

exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation,

including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity

- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children missing from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and National Cyber Security Centre - NCSC.GOV.UK.

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

### **Mental health**

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

See separate Mental Health Policy. More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Every Mind Matters for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following procedures laid out in this policy including referral to the DSL.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance.

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental 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.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due

regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. The school’s or college’s designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The most up to date guidance on Prevent can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

The school assesses the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This is based on an understanding, shared with partners, most notably the bi-borough Prevent Team, of the potential risk in the local area. As with all other issues of safeguarding, we aim to prevent people from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk, and intervening as appropriate. Referrals will be adjusted to respond to the level of risk to identify the most appropriate route, which could include Channel or LBHF Children’s Social Care.

As guided by the Staff Code Conduct, any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised.

#### **Staff training**

The school makes sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. They should know where and how to refer children and young people for further help. Prevent awareness training will be a key part of this.

#### **IT policies**

The school ensures children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering to check, monitor, manage and filter usage.

#### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead (or deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel guidance. Additional support The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

### **Sexual violence and sexual harassment between children in schools and colleges**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

#### **Sexual violence:**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 [135] as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe

that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. [137] Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16; [138]
- Sexual intercourse without consent is rape.

### **Sexual harassment:**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
  - Sharing of unwanted explicit content;
  - Upskirting (is a criminal offence);
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - Sexual exploitation; coercion and threats.

### **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

increased absence from school

- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.
- 

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy. Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

### **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

## **Actions**

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

## **FGM**

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

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

## **Forced marriage**

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK](https://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage) (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fmu.gov.uk](mailto:fm@fmu.gov.uk).

**Special educational needs and/or disabilities:** Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, gay, bi or trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Children who go missing from school:** A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. The school's procedure for dealing with children who go missing can be found in the staff handbook. All unexplained absences will be followed up in accordance with this policy.

The school shall inform the local authority of any pupil who is going to be added to or deleted from the school's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a. fulfil its duty to identify children of compulsory school age who are missing from education; and
- b. follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The school will inform both the local authority where the school sits and the local authority where the child is normally resident of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority. Action should be taken in accordance with this policy if any absence of a pupil from the school gives rise to a concern about their welfare.

## **APPENDIX 2: ROLE OF DESIGNATED SAFEGUARDING LEADS**

The overarching 'Lead' Designated Safeguarding Lead (Lead DSL) is **Joanna Wallace**, Principal of Kensington Wade School. She is the Safeguarding Children Manager and is responsible for the implementation of this policy.

The DSL and DDSs 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 KCSIE guidance sets out the broad areas of responsibility to which our DSLs are asked to comply with, having regard for our internal safeguarding policy and in liaison with the Lead DSL as appropriate:

## Managing referrals

Refer 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 Head and Proprietors to inform them of issues especially ongoing enquiries under section 17 and 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.

When making referrals, due consideration must be made about what is known about the child's wider context (i.e., contextual safeguarding).

## Training

- The DSL should receive appropriate training carried out every two years 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 school's child protection policy and procedures, especially new and part time staff
  - 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 written records of concerns and referrals for each child, kept in a separate file.
  - 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, in any measures the school or college may put in place to protect them
- DSLs and all professional staff should, in particular, be alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs;
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
  - has a mental health need;
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
  - is frequently missing/goes missing from care or from home;
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation;
  - is at risk of being radicalised or exploited;
  - has a family member in prison, or is affected by parental offending;

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

## Raising Awareness

- The DSL should ensure the school's policies are known and used appropriately:
  - The Lead DSL has responsibility for ensuring the safeguarding and child protection policy is reviewed annually, however each DSL is expected to participate in the process and assist with implementation as appropriate
  - Ensure the school's safeguarding and child protection 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 School in such activities.
  - Link with the LA to make sure staff are aware of training opportunities and the latest local policies on safeguarding
  - Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible, though a copy is retained with us. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

## APPENDIX 3: RESPONDING TO SUSPICIONS OF ABUSE

- ◆ We acknowledge that abuse of children can take different forms - physical, emotional, sexual and neglect.
- ◆ When children are suffering from physical, sexual or emotional abuse, or neglect, this may be demonstrated through changes in their behaviour, or in their play.
- ◆ Where such changes in behaviour occur, or where children's play gives cause for concern and there is a possibility of a child suffering significant harm, Children's Services will be consulted.
- ◆ We allow investigation to be carried out with sensitivity. Staff in the School take care not to influence the outcome either through the way they speak to children or ask questions of children.
- ◆ Where a child shows signs and symptoms of neglect or of a failure to thrive, we make appropriate referrals.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral will be made immediately to LBHF children's board. This referral can be made by any professional, but would usually be made by the DSL. If any member of staff makes a referral directly to LBHF's children's board, they should notify their DSL as soon as possible thereafter.

## Disclosures

Last Review: April 2023

Next Review: September 2023

Where a child makes a disclosure to a member of staff, that member of staff should:

- listen carefully
- avoid asking leading questions
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- reassure victims that they are being taken seriously and that they will be supported and kept safe
- a victim should never be given the impression that they are creating a problem
- a victim should never be made to feel ashamed

The member of staff must always refer the matter to the Head or appropriate DSL for the site/section concerned and complete a written safeguarding concern sheet.

### **Recording suspicions of abuse and disclosures**

Using the Pupil Safeguarding Concern Sheet, staff make a written record of:

- ◆ The child's name;
- ◆ The child's address;
- ◆ The age of the child/their Class;
- ◆ The date and time of the observation or the disclosure;
- ◆ An objective record of the observation or disclosure;
- ◆ The exact words spoken by the child;
- ◆ The name of the person to whom the concern was reported, with date and time; and
- ◆ The names of any other person present at the time.

These Safeguarding Concern records are signed and dated and kept in a separate confidential file under the direction of the Head. All members of staff are trained in the procedures for recording and reporting by written record, making use of the specific Pupil Safeguarding Concern sheet, as appropriate.

### **Taking concerns forward**

Where the DSL believes a safeguarding concern for a child exists, then she will notify the matter to LBHF's Safeguarding Team.

### **Informing Parents**

Subsequent to a referral to LBHF, the relevant Duty Social Worker (DSW) will advise next steps. As directed by DSW, the responsibility for communication to the parents would be usually be exercised by the Head, or by a suitably trained deputy. In cases where the parent is the likely abuser, the investigating officers of LBHF/Police will inform parents.

### **The child's wishes**

Where there is a safeguarding concern, we ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. When interviewing children, we will do so confidentially and enable the child to express their views and give feedback, and ultimately our systems and processes will operate with the best interests of the child at their heart. Our school council, confidentiality box and pupil questionnaires also provide a platform for pupils to express their wishes on a regular basis.

### **Support to families**

- ◆ The School takes every step in its power to build up trusting and supportive relations among families, staff and volunteers in the group.
- ◆ The School continues to welcome the child and the family whilst investigations are being made in relation to abuse in the home situation.
- ◆ Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child only if appropriate under the guidance of LBHF Children's Social Care.
- ◆ With the proviso that the care and safety of the child is paramount, we do all in our power to support and work with the child's family.

### **Children's Services and Safeguarding Register**

Whilst cases are active, confidential records are kept and updated regularly by the DSL concerned. These records are regularly checked by the governor with responsibility for safeguarding, Chris Skelton, to ensure that a central record of concerns is maintained. If in the event of an unexplained absence of more than one day of a pupil who is on the safeguarding children register, the DSL will notify LBHF's safeguarding team.

### **Confidentiality**

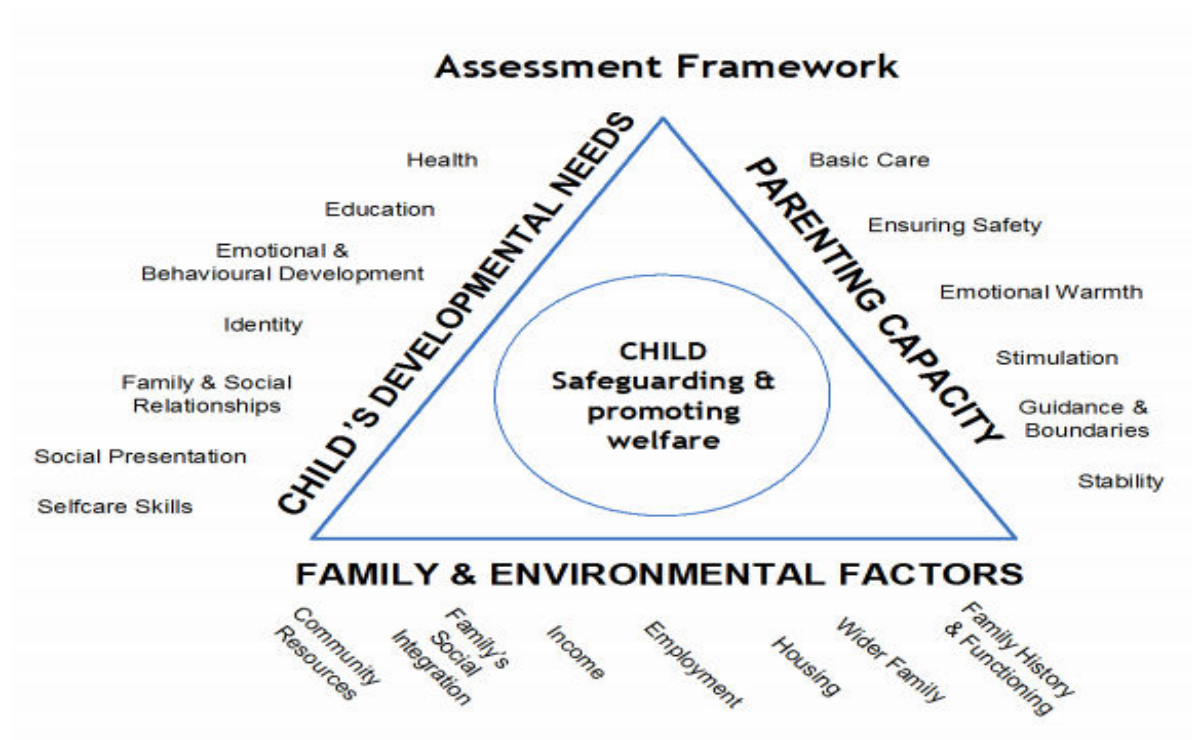
All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the LADO (adults) and Children's Social Care (children/young persons). Confidentiality cannot be promised.

## **APPENDIX 4: LIAISON WITH OTHER BODIES/RESPONSES TO REFERRALS**

We have procedures for contacting the local authority on safeguarding and child protection issues, to ensure that it is easy, in any emergency, for the School and local statutory children's agencies, including social services, to work well together.

We work within the Local Safeguarding Children Board guidelines which confirm locally agreed inter-agency procedures, now based online for our use on demand, and recognise our point of contact to be the Local Authority Designated Officer (LADO) for allegations against staff and Children's Social care for allegations involving children. We will report through the LADO within one working day the actions we take in respect of allegations of abuse by adults, and through Children's Services and their Social Care and Assessment team's Duty Social Worker where we have concerns that a child/young person may be at risk of harm (See Working Together Chapter One). The assessment framework model we abide by is shown below (as directed by KCSIE).

### **Assessment framework**

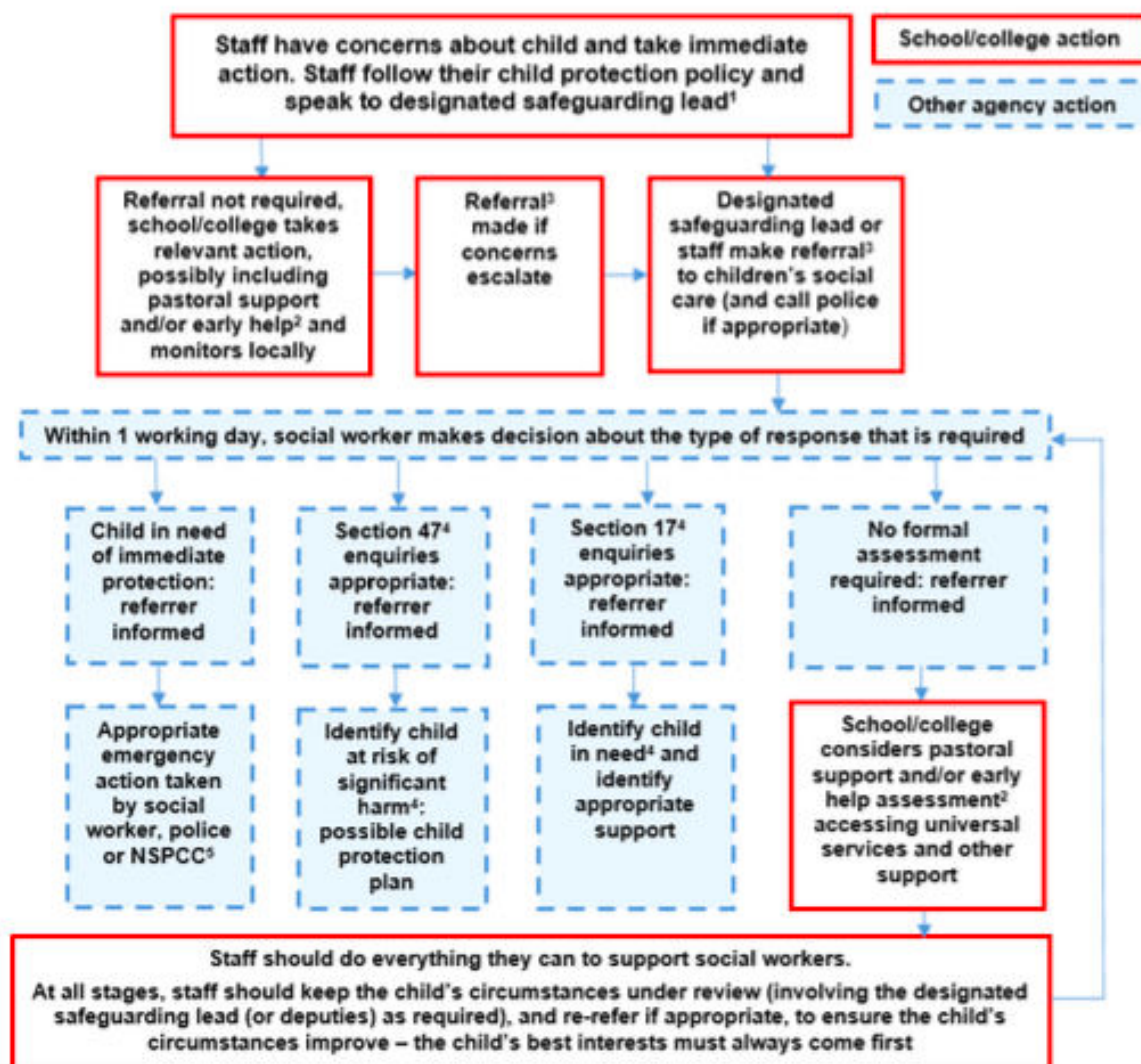


As the Assessment Framework implies, where our concerns involve safeguarding children at risk (who have suffered or are likely to suffer significant harm), those concerns will be reported to Children's Social Care immediately. Where we identify those children who are in need of additional support from one or more agencies, then we will seek inter-agency assessment using local processes, including use of the "Common Assessment Framework (CAF)" and "Team around the Child" (TAC) approaches.

Our procedures and processes are inspected by ISI. ISI is the government approved independent inspectorate for independent schools, quality assured on behalf of the DfE and reports on the extent to which Kensington Wade meets statutory requirements.

What follows below/on the next page is the KCSIE guidance on Actions where there are concerns about a child.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

Below are the priorities once a [Referral of a safeguarding](#) nature about a child has been made to Children's Services.

## Response to a referral

Once the referral has been accepted by local authority children's social care the lead professional role falls to a social worker.

The social worker should clarify with the referrer, when known, the nature of the concerns and how and why they have arisen.

Within **one working day** of a referral being received a local authority social worker should **make a decision** about the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm, and whether enquires must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

### Action to be taken:

The child and family must be informed of the action to be taken.

Local authority children's social care should see the child as soon as possible if the decision is taken that the referral requires further assessment.

Where requested to do so by local authority children's social care, professionals from other parts of the local authority such as housing and those in health organisations have a duty to cooperate under section 27 of the Children Act 1989 by assisting the local authority in carrying out its children's social care functions. This duty also applies to other local authorities.

## APPENDIX 5: RECRUITMENT OF STAFF, VOLUNTEERS AND OTHER WORKERS

For the avoidance of doubt, this applies to all divisions of the school, including EYFS and after-school activities.

- We always aim to ensure safe and fair recruitment and selection is conducted at all times. Safeguarding and promoting the welfare of children and young people is an integral factor in our recruitment and selection and is an essential part of creating safe environments for children and young people.

Last Review: April 2023

Next Review: September 2023

- We operate safe recruitment procedures which have regard to the guidance contained in KCSIE and in compliance with the Independent Schools Standards Regulations, which aim to ensure that no disqualified or unfit person works in the school or has access to children. Though not an exhaustive list, this will include checks via the Disclosure and Barring Service (DBS), checks against the appropriate Barred List, prohibition checks (for teaching posts), employment history, appropriate references and whether a person is disqualified from working with children (including by association, where applicable to the role applied for).
- Regulation on Disqualification from Childcare, including ‘by association’, makes 3 demands of schools
  - A requirement to inform relevant people of the legislation, including that they may be disqualified ‘by association’ (or ensure they have been informed by others, such as their supply agency)
  - A requirement to “take steps to gather sufficient and accurate information about whether any member of staff in a relevant childcare setting is disqualified by association”
  - A requirement to keep records, including “the date disqualification checks were completed”, whether on the Single Central Register (optional) or elsewhere.

Our recruitment procedures comply with these demands.

- We take particular care to ensure those involved in one-to-one teaching are aware of their safeguarding responsibilities, and a weekly check whilst the school is in session is carried out to ensure that all rooms/locations used for this purpose are visited.
- Applicants for posts within the School are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974 (and the Childcare (Disqualification) Regulations where appropriate). Candidates are informed of the need to carry out checks before posts can be confirmed and that any job offer will be withdrawn if any check is not satisfactory. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.
- Volunteers who have not been through the full vetting process do not work unsupervised.
- All school staff are provided with a copy of KCSIE 2022 (Part One) which includes Annex B on their first day of service in the school, and as part of their induction process have their understanding of its contents checked.
- All leaders and those staff that work with children have their attention drawn to Annex B, including as it does further information on Children Missing in Education, Child Criminal and Sex Exploitation, Cybercrime, Honour-based violence, including FGM and Forced marriage and their mandatory reporting, child-on-child abuse and on preventing radicalisation, the Prevent duty and the Channel programme.
- A number of school staff, such as the administration staff, have little opportunity for contact with children. They are always advised not to have contact with children, and not to encourage inappropriate friendships. They are advised on safeguarding on appointment, and updated within every 3 years unless statute requires more frequently. There are circumstances (for example by way of language or lack of literacy) which

mean they cannot be given a copy of KCSIE (PartOne) to read. This may only happen where the risk assessment on appointment identifies them as not being ‘workers with children’; for further information, please contact Joanna Wallace.

### **External workers and visitors**

- We take all appropriate steps to ensure that checks are made on any staff employed by another agency working in school. These are known as Visiting Professionals, and include Psychologists, Nurses, Police, other public sector staff who will have been checked by their employing organisation (such as LA, Primary Care Trust, Strategic Health Authority), Sports referees and other equivalent professionals supplied by a central body.
- We take security steps to ensure that we have control over who comes into the school so that no unauthorised person has unsupervised access to the children.
- Visiting Speakers; all visiting speakers are checked for suitability by the head/deputy/assistant head with responsibility for the invitation and any visiting speakers – whether invited by staff or by children themselves – are always appropriately supervised. They are never left alone with children.

### **Training of staff in safeguarding matters and KCSIE**

- The training of the all the DSLs includes child protection, higher-level safeguarding and inter-agency working, and is updated at least once every two years
- New staff, volunteers and other workers (such as self-employed, visiting instructors) who join the school are required to participate in induction training appropriate to their role, matching those of existing staff (see page 17). This will include as a minimum:
  - Identification of the School’s Lead DSL and site specific DSL(s)
  - The School’s safeguarding policy
  - The Behaviour policy
  - The Children Missing from Education policy
  - The Code of Conduct for staff
  - Whistleblowing procedures/policy
  - Specific reference to online safety and training
  - A copy of Part 1 of KCSIE 2022, including Annex B

Such induction training will usually take place within the first few weeks of employment.

- All existing staff, volunteers and other workers (such as self-employed, visiting instructors) who work with children receive updated training at regular intervals with the content being in accordance with the LSCB. We aim to ensure this happens at least once every three years with training being delivered either by an external consultant or, if not available, the DSLs.
- Those staff, volunteers and other workers (such as contractors) who do not work directly with children receive training as deemed appropriate to their role by the Lead DSL and LSCB. Such workers are always advised not to have contact with children and not to encourage inappropriate friendships. This training and supporting guidance will also be updated at regular intervals. We aim to ensure this happens at least once every three years and is usually delivered by the DSLs.

- All staff, volunteers or other workers who have contact with children are required to have read **KCSIE**  
 \*If there are circumstances which mean we cannot give him/her a copy of KCSIE to read (for example by way of language or lack of literacy) we ensure that they understand the key information. This may only happen where the risk assessment on appointment identifies them as not being ‘workers with children’; for further information, please contact the Lead DSL.
- A record of training in safeguarding/child protection is kept on a central record by the Head.

### **Staff obligations**

- All staff in our school are required to notify the Head immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare.
- The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.
- The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Head immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the Head immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.
- Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head for more details.

### **Staff, volunteers or workers leaving**

- The School will promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met; that is, they have caused harm or posed a risk of harm to a child.
- In addition, consideration will also be given to making a referral will be made to the National College for Teaching and Leadership where a teacher has been dismissed for misconduct (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate. The reasons for such an order include “unacceptable professional conduct”, conduct that might bring the profession into disrepute, or a “conviction”, at any time, for a relevant offence. The TRA (teacher regulation agency) will be informed.

## **APPENDIX 6 – MANAGING ALLEGATIONS AGAINST STAFF AND WHISTLEBLOWING POLICY**

The school has adopted this policy and the accompanying procedure on whistleblowing to encourage and enable members of staff to raise serious concerns internally and in a confidential fashion about poor or unsafe practice, potential failures in the school's management (its safeguarding regime, for example) fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation. The school must follow the procedures for handling allegations made against staff, supply staff and/or volunteers set out in Part 4 of KCSiE.

Though the term 'staff' is used, this policy applies to all those who are employed by the School, employed through an agency, contractors or as a volunteer.

## **1. Purpose of the policy**

The School's policy on whistleblowing is intended to demonstrate that the school:

- Encourages all staff, whatever their status, to raise concerns they have about the conduct of the school's business;
- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

These procedures are in addition to the school's complaints procedures and other statutory reporting procedures.

## **2. Procedure**

This procedure is intended to be used primarily for concerns where the interests of the pupils or of the School itself are at risk. It is separate from the school's adopted procedures regarding grievances; staff should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding poor or unsafe practice, potential failures in the school's management or suspected malpractice within the School. Please note that rather than wait for proof, we would encourage staff to raise matters whilst they are still a concern.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

Staff who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality

that concerns are raised verbally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

### **3. The Investigation**

A member of staff will be at liberty to express their concern to the Head or Deputy.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution. If applicable to the circumstances, the School will take steps to provide mediation and dispute resolution for all parties involved.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Chair of Governors.

### **4. External Procedures**

Where all internal procedures have been exhausted, a member of staff shall have a right of access to a complaints panel made up of two people independent of the school and the complaint.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where he or she reasonably believes :-

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it.

### **5. Malicious Accusations**

Provided that you are acting in good faith, it does not matter if you are mistaken or your concerns are unfounded. However, false, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure and may, depending on the seriousness be regarded as gross misconduct.

#### **Protection from Reprisal or Victimisation**

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the Whistleblowing procedures. The school will not tolerate harassment or victimisation of someone who has raised a genuine concern and any such behaviour will be dealt with as a disciplinary matter.

### **APPENDIX 7 ~ ONLINE SAFETY**

We consider that the increasing availability to children of electronic devices that give unrestricted access to the internet, has direct consequences for both safeguarding and anti-bullying arrangements. Pupils are taught about safeguarding both on and off-line, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience, and are made aware of this policy through the PSHE, Relationships Education programmes and other appropriate activities within a broad and balanced curriculum.

The vigilance of teachers and parents have a part to play in the safeguarding and protection of pupils. We agree that pupils will often have access to technologies that have both positive and negative potential. Our various policies highlight how we use and deploy our technologies and emphasise what is appropriate and acceptable. Links to these policies through the main school website.

We actively manage our hardware, software and connectivity as follows:

- (a) Defined roles and responsibilities for online safety as part of the school's wider safeguarding strategy - the DSL takes overarching lead. Incidents are written up on school Incident forms to ensure tracking of such technology/online events are captured.
- (b) We provide clear guidance on the use of technology in the real and virtual classrooms and beyond for all users, including staff, students/pupils and visitors that references permissions/restrictions and agreed sanctions; our policies and procedures make specific reference to these, in line with [Teaching Online Safety in schools 2019](#)
- (c) Technical provision/infrastructure and the safeguards in place to filter and monitor inappropriate content and alert the school to safeguarding issues: for reasons of security we do not provide this detail in this policy.
- (d) Staff laptops and tablets are subject to scrutiny to ensure compliance with policies and procedures.
- (e) Detail on how the school builds resilience in its students to protect themselves and their peers through education and information;
- (f) Detail on staff safeguarding professional development that includes online safety; All members of staff receive initial training and regular in-service in online safety as part of their safeguarding training, log kept by Head
- (g) Reporting mechanisms available for all users to report issues and concerns to the school and how they are managed and/or escalated;  
See Safeguarding training and use of Concern sheets to 'statement' issues and concerns.
- (h) How the school informs, communicates with and educates parents/carers in online safety;
- (i) The management of personal data in line with statutory requirements. Our data protection policy can be found in the handbook

## **APPENDIX 8: COVID-19**

The school's commitment to safeguarding remains the same during the circumstances brought about by the coronavirus pandemic. Whether the school is open, partially open or closed with online learning in operation, the principles and practice of KCSiE and the school's safeguarding policy and ICT code of conduct, will continue to apply. The school will also adhere to the latest DfE safeguarding coronavirus guidance and advice. The DSL and deputy DSL will always be available.

## APPENDIX 9: SUMMARY OF SAFEGUARDING AND CHILD PROTECTION PROCEDURES

<p style="text-align: center;"><b>YOU MUST:</b></p> <p>Treat all pupils with respect and be mindful of their right to privacy          Be an exemplary role model to pupils          Contribute to the establishment of an environment in which children will feel respected and listened to by adults and have the confidence to approach them about matters of concern to them          Ensure that, where possible, there is another adult present, or you are within sight or earshot of others, if you intend to discuss sensitive issues with a pupil          Remember that someone else may misinterpret your actions or words, no matter how well-intentioned          Report any concerns to the Head</p>	<p style="text-align: center;"><b>YOU MUST NOT:</b></p> <p>Have inappropriate verbal or physical contact with pupils          Make suggestive or derogatory remarks or gestures to pupils          Show favouritism or undue attention to any individual          Rely on your/the school's good name to protect you          Believe that 'it could never happen to me/my school/my colleague'          Exaggerate or trivialise child abuse issues          Jump to conclusions or make assumptions without checking (do not investigate – refer)          Allow yourself to be drawn into inappropriate patterns of behaviour          Fail or forget to report something you are concerned about to the Designated Safeguarding Lead of the Head.</p>
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### What to do if.....

#### ... a pupil discloses to you abuse by someone else:

- Stop, listen and offer the pupil immediate support, understanding and reassurance
- Explain that you cannot promise confidentiality but must tell the people who can help
- Allow the pupil to speak without interruption or leading questions, accept what is said
- Alleviate the pupil's feelings of guilt and isolation while passing no judgement
- Use non-judgemental/supportive phrases like 'I believe you' and 'I'm going to help'
- Let the pupil know you are glad that he/she has shared information with you

#### ....you suspect a pupil is being abused emotionally, physically, sexually, through neglect or is at risk of radicalisation:

- Report the matter immediately to the Designated Safeguarding Leads
- Do not tell other adults or pupils what you have been told – keep the loop tight

#### ...you receive an allegation about another member of staff:

- Report the matter immediately to the Head (and no one else)

#### ...you receive an allegation about the Head

- Report to the Chair of Governors and to no one else

#### In all cases:

- Record the facts at the time (you can write up your notes later but keep the originals)
- NB – YOU MUST LISTEN AND REFER; YOU MUST NOT INVESTIGATE

Although these are normal reporting lines anybody can make a referral to children's social care if necessary

The Designated Safeguarding Lead is Joanna Wallace (Deputies: Jing Wang and Mary-Anne Malloy)

## APPENDIX 10: CONCERN FORM

If you have a concern about a child, fill in this form. Keep it safe and somewhere secure. Hand it to a DSL asap.

### KENSINGTON WADE CHILD PROTECTION INCIDENT/WELFARE CONCERN FORM

Pupil name	Date of birth	Year group
Name and position of person completing form (please print)		
Time and Date of incident/concern: dd.mm.yy		
Incident/concern (who what where when)		
Any other relevant information (witnesses, immediate action taken)		
Action taken		
Reporting Staff Signature.....Date		

DSL – Response/Outcome

DSL Signature.....Date

When a file is started on a child of concern, this form goes at the front of the file

**KENSINGTON WADE CHILD PROTECTION / WELFARE CONCERNS PUPIL FILE FRONT SHEET**

Pupil name:		Date of birth:	
Any other name by which the child is known:			
Home address:		Current address (if different):	
Telephone no:			
Family members i.e. parents/carers/siblings:			
Name	Relationship	Address	School details
Date file started:			
Are records held in school relating to other connected children?			
Contact details of other professionals:			

Name	Agency	Address

Once a child has been raised as a possible concern and a file has been opened in the CP file, this form may be used to monitor further incidents and observations

Continuation Sheet Incident/Concern; other relevant information; Action Taken; Outcome	
PUPIL NAME:	
DATE	DETAILS

Signature	

