

# Tower House School

## Safeguarding and Child Protection Policy

This policy applies to the Whole School, including EYFS

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## 1. KEY EXTERNAL CONTACT DETAILS

	Telephone No.	Email	Website
Kingston and Richmond Safeguarding Children Partnership	020 8831 6323	lscb-support@achievingforchildren.org.uk	<a href="http://www.kingstonandrichmondscb.org.uk/">http://www.kingstonandrichmondscb.org.uk/</a>
Local Authority Designated Officer (LADO)	020 8891 7969	lado@achievingforchildren.org.uk	<a href="http://kingstonandrichmondscb.org.uk/practitioners/managing-allegations-against-adults-29.php">http://kingstonandrichmondscb.org.uk/practitioners/managing-allegations-against-adults-29.php</a>
London Borough of Richmond Single Point of Access Team	Office hours: 020 8547 5008 Our of hours: 020 8770 5000	spa@richmond.gov.uk	<a href="http://www.richmond.gov.uk/single_point_of_access">www.richmond.gov.uk/single_point_of_access</a>
Support and Advice about Extremism	Police emergency: 999 Police non emergency: 101 Helpline for non emergency advice for staff and Governors: 020 7340 7264	counter.extremism@education.gsi.gov.uk	
NSPCC Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk	
Disclosure and Barring Service	01325 953795	dbsdspatch@dbs.gsi.gov.uk	
Teaching Regulation Authority (TRA)	020 7593 5393	misconduct.teacher@education.gov.uk	
OFSTED Safeguarding Children	0300 123 4666 (Monday to Friday from 8am to 6pm)	Whistleblowing@ofsted.gov.uk	

## 2. KEY SCHOOL CONTACT DETAILS

Position	Name	Mobile	Email
Governor responsible for safeguarding	Mr Alex Wilson	07539 301063	AGW@stpaulsschool.org.uk
Acting Chair of Governors	Mr Charles Pike		

Designated Safeguarding Lead (DSL) inc. EYFS	Mr Justin Ryan	07885100009	ryan@thsboys.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mr Gregory Evans	07739803453	head@thsboys.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mrs Kerry Hogan	07799 840256	Hogan@thsboys.org.uk
Designated Teacher for looked after children	Mr Joe Morris	07863 793061	Morris@thsboys.org.uk
Head	Mr Greg Evans	07739 803453	head@thsboys.org.uk
SENCO	Mrs Anna Patel	0208 876 3323	patel@thsboys.org.uk
Health and Safety Officer	Mr Joe Morris	07863 793061	Morris@thsboys.org.uk

### 3. POLICY STATEMENT

This policy applies to Tower House School ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website or from the School office. The safety and welfare of all our pupils at Tower House School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety.

This policy has regard to the following guidance and advice:

- [Keeping Children Safe in Education \(KCSIE September 2020\)](#) ('KCSIE 2020')
  - [Disqualification under the Childcare Act 2006 \(June 2016\)](#)
  - [What to do if you are worried a child is being abused \(March 2015\)](#) advice for practitioners
  - [Working Together to Safeguard Children \(September 2018\)](#)
  - [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 \(June 2015\)](#)
  - [How social media is used to encourage travel to Syria and Iraq Briefing Note for Schools \(July 2015\)](#)
  - [Guidance for full opening of schools \(August 2020\)](#)

This policy also takes into account the procedures and practice of Richmond local authority as part of the inter-agency safeguarding procedures set up by Kingston and Richmond Safeguarding Children Partnership.

All staff, Governors and volunteers have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of children is **everyone's** responsibility. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 and Annex A of KCSIE (September 2020). All staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

Tower House School prides itself on respect and mutual tolerance. Parents/carers have an important role in supporting the School. Copies of this policy, together with our other policies relating to issues of child protection are on our website and we hope that parents and carers will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

### **3.1 Tower House School – Promoting Awareness**

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all staff to lead by example and to play a full part in promoting awareness that is appropriate to the age of pupils, on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our *Behaviour and Discipline Policy* and in enforcing our *Anti-Bullying Policy*.

Time is allocated in PSHE to activities of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding. Time is also allocated to address mental health and wellbeing. PSHE is delivered via the 'Jigsaw' program.

All pupils know that there are adults to whom they can turn to if they are worried such as their class teacher, Head of Year or Deputy Head. If the School has concerns about a child there is always a recognised requirement for sensitive communication and staff members are aware of the need to avoid asking leading questions.

Our support to pupils includes the following:

- Every child from Year 3 upwards has a homework diary which contains guidance on where to turn for advice, including the confidential helpline ChildLine.
- Our notice board displays advice on where pupils can seek help.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to the School's *Anti-Bullying Policy*. E-safety to pupils is taught through lessons, activities and assemblies and our annual E-safety week with separate information evenings for parents.
- The DSL shares with parents regular updates around online safety.

## **4. CONCERNS 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.

The School has arrangements for listening to children and providing early help. The School recognises that there may be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as the Single Point of Access Team). This may lead to a written plan to support a child in need being drawn up or an Early Help Assessment, such as the Common Assessment Framework, being carried out. In either case, the DSL will liaise and take advice from external agencies as appropriate.

### **4.1 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 mental and physical 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.

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, more rarely, by others (e.g. via the internet). 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
- radicalisation.

Staff are aware that abuse can take place wholly online or that contact online can be used to facilitate offline abuse. Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

## **5. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

This includes EYFS.

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.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- 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. However, handled sensitively and shared appropriately.

In addition we advise not to probe or put words into the child's mouth, to limit questioning to the minimum necessary for clarification, remain calm and 'neutral', be aware of your non-verbal and verbal communication, give the child your full attention, time and privacy, conduct the meeting in a room with the door open and maintaining 'sightlines' to other staff, only ask open-ended questions for clarification purposes, encourage the child to talk spontaneously and reassure the child it is not their fault.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing by completing a safeguarding concern form, as quickly as possible, which includes the following information:

- The child's name; address, date of birth;
- The day, date and time of the observation or the disclosure;
- An objective record of the observation or disclosure;
- The exact words spoken by the child; this will form a vital piece of evidence in any subsequent investigation. Make clear differences between fact, opinion and hearsay.
- The name of the person to whom the concern was reported, with date and time;
- The names of any other person present at the time. Also note how the child presents themselves.

Report the matter to the DSL / DDSL / Single Point of Access Team. If the child is in immediate danger or is at risk of harm a referral should be made to the Single Point of Access Team or the police immediately. Anyone can make a referral.

The record of concern should be signed and dated and kept in a separate confidential file by the DSL.

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. In the light of any disclosure made, the DSL/DDSL may decide to initiate an enquiry with the pupil's parents or carers.

During such enquiries the identity of the adult who received the disclosure will not usually be shared, so long as this is practical and does not compromise the welfare of the child.

However, this information may be shared with relevant agencies should the subsequent effective case management require it.

The School supports such pupils by recognising that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. School may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may be withdrawn and difficult to engage. Some children actually adopt abusive behaviours and these children must be referred on for appropriate support and intervention.

The School will endeavour to support pupils through:

- Providing a key adult to act as counsellor and mentor. This adult will have the appropriate mental health issues training;
- The content of the curriculum to encourage self-esteem and self-motivation;
- The School ethos which, promotes a positive, supportive and secure environment, and gives pupils a sense of being valued;
- Allowing children to express their views and give feedback via their class teacher or Head of Year or directly to the Deputy Head who is in charge of pastoral care.
- The School's Behaviour and Discipline Policy, which is aimed at supporting vulnerable pupils in the School;
- Ensuring all staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the child but does not damage the pupil's sense of self-worth;
- Ensuring that the pupil knows that some behaviour is unacceptable but he is valued and not to be blamed for any abuse which has occurred;
- Recognising that children living in a home environment where there is domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection;
- Vigilantly monitoring children's welfare, keeping records and notifying the relevant agencies as soon as there is a recurrence of a concern;

The School operates its processes with the best interests of the pupil at their heart.

If the DSL believes the child requires additional support from one or more agencies, an Early Help Assessment (EHA) is completed. If the DSL (or Deputy) believes the child has suffered from or is likely to suffer significant harm then the Single Point of Access Team / Police must be informed immediately.

See Appendix 2 for a flow chart of the procedure

### **5.1 Early Help**

All staff are expected to identify when a child may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

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 [Kingston and Richmond Safeguarding Children Partnership Multi Agency Threshold Document 2018](#). 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.

### **5.2 Monitoring and Managing ongoing Cases of Concern**

Ongoing Safeguarding cases are monitored and managed on an individual and case by case basis. Weekly reviews of such cases take place within SMT meetings. Additional meetings are held with relevant parties (ie class teacher / parents / outside agencies) as required. All cases are monitored by the DSL, in liaison with DDSs, especially the Head. Minutes of all meetings, details of all decisions made and copies of all

related emails are retained (as hard copies) in the Safeguarding Concern file which is held securely in the Head's office.

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

If staff (including governors, agency staff 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 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. If a child's situation does not appear to be improving, the DSL (or the person that made the referral) 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.

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

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care 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.

The School's safeguarding partner is Kingston and Richmond Safeguarding Children Partnership. A full copy of their local procedures can be found on their [website](#).

### **5.5 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, as set out above. This may include a referral to Channel or children's social care 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 or inform the DSL or Contact the Richmond Single Point of Access Team.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). School staff should be aware of and able to recognise engagement, intent and capability factors which indicate that a person may be vulnerable to being drawn into terrorism.

Indicators for vulnerability to radicalisation are:

- Family tensions
- Sense of isolation
- Low self-esteem/feeling of failure
- Migration / distance from cultural heritage
- Events affecting the pupil's country or region of origin
- A sense of grievance triggered by personal experience

Early indicators of radicalisation or extremism may include:

- Becoming involved with a new group of friends
- Searching for answers to questions about identity, faith and belonging
- Expressions of support for terrorism, justifying the use of violence to solve real or perceived grievances
- Possessing or accessing extremist materials
- Changes in behaviour and language

It is important to note that children and young people experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour including those detailed in this policy.

The School has carried out a Prevent Risk Assessment for its pupils. Concerns about a pupil thought to be at risk of radicalisation or of being drawn into terrorism must be referred in accordance with the school's safeguarding procedures. Staff must report concerns immediately to the DSL or the Deputy DSL in the first instance; advice will be sought from the Single Point of Access Team and a referral will be made where this is deemed necessary. Additionally, staff can also contact the Police or dial 101. The police can talk to you in confidence about your concerns and help you gain access to support and advice.

The Counter-Terrorism and Security Act 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police, and where considered appropriate and necessary, consent is obtained, to arrange for support to be provided to those individuals. The Act requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel.

Additional support / advice can be obtained from the Department for Education, which has a dedicated telephone helpline (020 7340 7264) to enable staff and Governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). Note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

All teaching staff undertake online Prevent training ([see website](#)) to ensure they are aware of real life scenarios of radicalisation. The School's ICT Administrator has visibility of the actions pupils perform via our network. The ICT Administrator sets criteria to flag alerts and monitors online activities of pupils using the applications and hardware detailed below. Interventions are made as appropriate.

The technical details of the filters used by the School are Paloalto with accreditation from (amongst others) Forrester, CRN and Best Container Security Platform 2019.

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

A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, FGM or forced marriage. Unauthorised absences from school will be managed in accordance with the School's *Missing Child Policy*.

The School monitors all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. 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 will be reported to the local authority. For further details on when the School has a duty to report to the local authority, please see the *Missing Child Policy (including a child missing education) and Procedures when a Child is not Collected on Time*.

The School will inform the local authority, and that of where the pupil is usually resident, of any pupil who is going to be deleted from the admission register where they:

- Transition before completing the School's final year or joins a school after the beginning of the school's first year and is of compulsory school age.
- Have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- Have ceased to attend school and no longer live within reasonable distance of the school;
- Have been certified by a suitable medical professional as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her

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

- Are in custody for a period of more than four months due to a final court order and the Head does not reasonably believe they will be returning to the school at the end of that period; or,
- Have been permanently excluded.
- Have excluded a pupil on the child protection register (whether fixed term or permanently)

The local authority will be notified when a school is to delete a pupil from its register under the above circumstances. This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that the School complies with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

In addition, if there is an unexplained absence of a pupil on the child protection register of more than two days duration from school (or one day following a weekend); or as agreed as part of any child protection or core group plan, then the local authority will be notified. For a child not on the child protection register, the local authority will be notified of an unexplained absence of more than 10 days.

### **5.7 Serious violence**

All staff should be aware of indicators, which may signal that 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.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

### **5.8 What staff should do if they discover an act of Female Genital Mutilation (FGM) / Honour Based Violence (HBV)**

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

Any concern regarding FGM or the preparation of a girl for FGM by a member of the School or wider community must be reported to police, they should also activate local safeguarding procedures by contacting the Richmond Single Point of Access Team. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve the Single Point of Access Team as appropriate. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information.

Further details are available here: <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>.

### **5.9 What staff should do if they have concerns about another staff member, including Agency Staff**

If staff have concerns about another staff member, including agency staff, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Acting Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below (See point 7) regarding managing allegations of abuse against staff (including agency

staff and volunteers) and refer the matter directly to the Richmond LADO. Staff may consider discussing any concerns with the School's DSL and make any referral via them.

### **5.10 What staff should do if they have concerns about Safeguarding Practices (Whistleblowing)**

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 regimes, these should be raised in accordance with the School's separate *whistleblowing policy* which can be found in the *Staff Handbook*. 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.

## **6. ARRANGEMENTS FOR DEALING WITH PEER ON PEER ALLEGATIONS**

Peer-to-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying (including cyber bullying), sexting (also known as youth produced sexual imagery), sexual assault and gender-based issues, 'upskirting' which typically involves taking a picture under a person's clothing without them knowing, 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. Anyone of any gender can be a victim of upskirting.

The School recognises that children are capable of abusing their peers and it is never regarded by the School as 'part of growing up' or 'banter', and is dealt with as a serious and possibly criminal activity.

The School minimises the risk of peer on peer abuse by addressing the issue via the PSHE curriculum, year group and whole school workshops. 'Anti-Bullying' Week provides a focus for this work. Class teachers and heads of year regularly review and discuss this issue with their classes, reminding children of the need to speak out and the adults to whom they can turn for help.

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', 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 Richmond Single Point of Access Team 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 Single Point of Access Team, 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 Single Point of Access Team or police as appropriate.

The School reserves the right to seize any mobile device which a pupil brings on site for evidence of sexting. When considering the initial evidence the DSL in conjunction with the DDSL and/or Head will decide if it is necessary to view the imagery in order to safeguard the young person – **in most cases, imagery should not be viewed.**

Advice regarding shared imagery from the UK Council for Child Internet Safety: Sexting in schools and colleges: Responding to incidents and safeguarding young people states that: If a young person has shared imagery consensually, such as when in a romantic relationship or a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with

aggravating factors, eg, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or the Richmond Single Point of Access Team.

Perpetrators and victims of peer on peer abuse will meet with the Head of Year / Class Teacher and the Deputy Head. They will be given individualised support and guidance on how to deal with bullying or how to avoid bullying type behaviours in the future. The parents of each will also be informed and will fulfil a very important role in the support and guidance of victim and perpetrator, and support from external agencies will be sought, as appropriate.

Also see the School's *Anti-Bullying and Behaviour and Discipline Policy*.

## **6.1 Child on Child Sexual Violence & Sexual Harassment**

The School is aware of and compliant with advice [Sexual Violence and Sexual Harassment between Children in Schools and Colleges, May 2018](#).

This advice contains what sexual violence and sexual harassment is, the related legal responsibilities and advice on a whole school approach to preventing child on child sexual violence and sexual harassment.

Tower House will make appropriate decisions on a case-by-case basis. This process will be led by the DSL (or DDSL) using professional judgement, liaising with and being supported by other agencies such as Richmond Children's Social care or the Police as appropriate.

## **6.2 Responding to a disclosure:**

All victims must be reassured that they are being taken seriously, will be supported throughout the process and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.

The victim will not be promised confidentiality at the initial stage. The concern will be shared with the DSL (or DDSL) and Richmond Children's Social care. The concern will only be shared with those required to progress the case (ie DSL / DDSL / Headmaster). The victim must be made aware (in age appropriate language) what the next steps would be and with whom the disclosure will be shared.

Staff must appreciate that the child has placed trust in the person receiving the disclosure. This could be anyone on the school staff. They must be respectful and supportive of the child. Staff must listen actively to the child. The staff member must be non-judgemental, clear about boundaries and how the disclosure will be progressed. Leading questions must not be asked; prompting the child appropriately with open questions – where, when, what, etc. Staff must consider the best way to record the disclosure. Best practice is to wait until after the disclosure to write a Record of Concern form. It may be appropriate to make notes during the disclosure, especially if a second member of staff is present. However, if making notes, staff should be conscious of the vital need to remain engaged with the child and not appear distracted. Either way, a written record of the disclosure is essential.

Staff must only record the facts as presented by the child. Staff members must be mindful that such notes could become part of a criminal investigation and must not reflect the personal opinion of the staff member receiving the disclosure.

Where the disclosure includes an online element, staff should not view, download or forward illegal images of a child. The associated device should be taken to the DSL (or DDSL or Headmaster). Please see further advice [Searching, Screening and Confiscation advice for schools, 2018](#) and [UKCCIS Sexting Advice](#).

If possible, the disclosure should be received in the presence of two members of staff (preferably including the DSL, DDSL or Headmaster).

### 6.3 Risk Assessment

When there has been a report of sexual violence, the DSL (or DDSL, Headmaster) should 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, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, Tower House will actively consider the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The DSL (or DDSL, Headmaster) will ensure they are engaging with children's social care and specialist services expeditiously and as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform Tower House's approach to supporting and protecting our pupils and updating our own risk assessment.

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible (and age appropriate) over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and other related issues and wider contextual safeguarding issues.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, Tower House will follow general safeguarding principles as set out in KCSIE (2020) and local safeguarding arrangements. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

### 6.4 Options to manage the report

Tower House will manage all sexual violence and sexual harassment situations on a case-by-case basis. The decision when to inform the alleged perpetrator will be considered carefully. Where a report is going to be made to Richmond Children's Social Care and/or the police, then, as a general rule, Tower House will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, this does not and should not stop Tower House from taking immediate action to safeguard our children, where required. There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment.

### **6.4.1 Manage internally**

In some cases of sexual harassment, for example, one-off incidents, Tower House may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.

Whatever the school's response, it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### **6.4.2 Early help**

Tower House may decide that the children involved do not require statutory interventions, but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. Full details of the early help process are in Chapter one of [Working Together to Safeguard Children 2018](#).

Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers. Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### **6.4.3 Referrals to Richmond Children's Social Care**

Where a child has been harmed, is at risk of harm, or is in immediate danger, Tower House will make a referral to local children's social care. At the referral to children's social care stage, the school will usually inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, the school (especially the DSL, DDSL or Headmaster) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

The school should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the DSL (or DDSL, Headmaster) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. Risk assessments will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the school should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (led by the DDSL, DSL or Headmaster) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL (or DDSL, or Headmaster) should consider other support mechanisms such as early help, specialist support and pastoral support.

Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

#### **6.4.4 Reporting to the Police**

Any report to the police will generally be in parallel with a referral to Richmond Children's Social Care. It is important that the DSL (or DDSL, or Headmaster) are clear about the local process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that Tower House is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. The DSL (and DDSL, Headmaster) is aware of the local arrangements. In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continues to engage with specialist support for the victim as required.

Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

#### **6.4.5 Considering bail conditions**

From April 2017, the use of police bail has been dramatically reduced and will only be used when deemed necessary and proportionate in exceptional circumstances. Consideration will be given to less invasive options to safeguard victims and witnesses and the administration of justice. Therefore, it is less likely that a child attending school will be on police bail with conditions attached if there are alternative measures to mitigate any risk.

In the absence of bail conditions, when there is a criminal investigation, early engagement and joined up working between the school, children's social care and the police will be critical to support the victim, alleged perpetrator and other children involved (especially potential witnesses). Where required, advice from the police should be sought in order to help the school or college manage their safeguarding responsibilities.

The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.

Where bail is deemed proportionate and necessary, the school will work with children's social care and the police to manage any implications and safeguard their children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

#### **6.4.6 Managing any delays in the criminal process**

There may be delays in any case that is being progressed through the criminal justice system. Tower House should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school or college. The risk assessment will help inform any decision.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, it will be important for the DSL (or DDSL, Headmaster) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

If the school has questions about the investigation, they should ask the police. The police will help and support the school or college as much as they can (within the constraints of any legal restrictions).

#### **6.4.7 The end of the criminal process**

If a child is convicted or receives a caution for a sexual offence, the school should update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in light of their behaviour policy. If the perpetrator remains in the same school as the victim, the school should be very clear as to their expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. It will be important that the school ensures both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school should continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

#### **6.4.8 Ongoing response: safeguarding and supporting the victim**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The school should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

#### **Support can include:**

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with the school to ensure the best possible outcomes for the victim. Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made

directly to the ChISVA service by the young person or school. Contact details for ChISVAs can be found at [Rape Crisis](#) and [The Survivors Trust](#).

- Child and adolescent mental health services (CAMHS)
- Rape Crisis Centre's can provide therapeutic support for children who have experienced sexual violence.
- [Internet Watch Foundation](#) (to potentially remove illegal images)

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their class teacher or Head of Year) or the DSL to talk to about their needs. The choice of any such adult should be the victim's. Schools and colleges should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the school should provide a physical space for victims to withdraw to, should they wish to and not because it makes it easier to manage the situation.

It may be necessary for the school to maintain arrangements to protect and support the victim for a long time. Tower House should be prepared for this and should work with children's social care and other agencies as required.

Whilst they should be given all the necessary support to remain in the school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice will help support this process.

#### **6.4.9 Safeguarding and supporting the alleged perpetrator**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

- The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
- Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from Richmond Children's Social Care, specialist sexual violence services and the police.
- It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and

where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice help support this process.

## **7. ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF INCLUDING THE HEAD, GOVERNORS, AGENCY STAFF AND VOLUNTEERS**

These provisions cover EYFS.

The School will liaise with the Richmond LADO, managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Head and DSL) and volunteers follows KCSIE 2020 and Working Together 2018 guidance, and local LADO arrangements and apply when staff, including volunteers and agency staff, have (or alleged to have):

- Behaved in a way that has or may have harmed a child.
- Possibly committed a criminal offence against or relating to a child.
- Behaved towards a child, or children, in such a way that indicates he or she may pose a risk of harm if they worked regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Been involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children ie domestic abuse.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police. Where a teacher has been dismissed (or would have been dismissed if he/she had not resigned) the School will consider making a referral to the TRA as a prohibition order may be appropriate ie 'unacceptable professional conduct', conduct that may bring the profession into disrepute' or a conviction, at any time, for a relevant office. Further advice can be found in the document [Teachers Misconduct: the prohibition of teachers.](#)

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 Richmond LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with Richmond LADO on a no-names basis.

All allegations should be investigated, via LADO, as a priority to avoid any delay and within 24 hours of the allegation.

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. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Acting Chair of Governors (the case manager). Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Acting Chair of Governors and Richmond LADO. 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 Richmond LADO 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 agreed with Richmond LADO. Richmond LADO 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 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 Richmond LADO and KCSIE 2020 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 Richmond LADO whether a referral to the Disclosure and Barring Service or TRA 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 TRA 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). Further details on when and how to refer to the DBS can be found here: [DBS barring referral form - GOV.UK](#)

7. On conclusion of the case, the case manager should review the circumstances of the case with Richmond LADO 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 unfounded or 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 2020 and a copy will only be provided to the individual concerned.

Allegations proven to be unfounded, false, unsubstantiated 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.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

The aim of the Code of Conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm, or of allegation of harm to a pupil.

Please also read the separate *Code of Conduct* and *Neutral Notification Policy*.

### **7.1 Neutral Notification Policy**

There are occasions when staff, as professionals, have to act in a particular way in order to protect the health, safety and welfare of pupils. Such situations could put the adult in a potentially vulnerable position

and perhaps cause them, with hindsight, to consider that they might have chosen to act in a different manner.

There may be occasions when an incident occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another child, such doubts which fall below the threshold for a Safeguarding Concern Report.

There may also be occasions when a member of staff has concerns about how their own behaviour in a specific situation might be misinterpreted by others.

It is important that any occasions or incidents which might give rise to such concerns are reported to the DSL. In the vast majority of cases, there will be a perfectly innocent and reasonable explanation for what has occurred.

Neutral Notifications can be made in person in the first instance, to the DSL. The Neutral Notification Form (available on the staff intranet) should be completed and passed to the DSL as soon as possible thereafter.

Further details can be found in the full *Neutral Notification Policy*.

## **8. 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.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's *Safer Recruitment Policy*.

The School undertakes a risk assessment before agreeing to a visiting speaker being allowed to attend. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers, whilst on the School site, are supervised by a School employee. Visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School keep a formal register of visiting speakers in line with its Data Protection Policy.

We have procedures for recording the details of visitors to the School. 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.

## **9. MANAGEMENT OF SAFEGUARDING**

Mr Justin Ryan, Director of Studies, History, Theology, Philosophy, Religion, is the School's Designated Safeguarding Lead (DSL). He is the main DSL for the School, including EYFS, and is a member of the School's senior management team.

Mr Gregory Evans, Head and Mrs Kerry Hogan, Head of Junior School, are the Deputy Designated Safeguarding Leads and to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to:

- Provide induction training
- Have an overview of staff safeguarding training and needs to facilitate that training as required
- Take lead responsibility for safeguarding and child protection matters in the School, including online safety
- Maintain an overview of safeguarding within the School
- Open channels of communication with local statutory agencies
- Support staff in carrying out their safeguarding duties
- Monitor the effectiveness of the School's policies and procedures in practice.
- Work with the Governors to review and update the School's safeguarding policy, at least annually.
- 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
- Help promote educational outcomes of all pupils, including children with a social worker. The DSL holds this responsibility collegiately with the SENDCO and looked after children (LAC) teacher and other relevant staff.
- Ensure this Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made directly or via the DSL, and are aware of the role of the School in this
- Link with the Kingston and Richmond Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

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 the Single Point of Access Team.

During term time, the DSL or DDSLs 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 School's arrangements are in the first instance to contact Mr Gregory Evans, the DDSL.

Full details of the DSL's role can be found in [Annex B of KCSIE 2020](#).

The DSL and DDSLs have responsibilities of their safeguarding role as DSL included in their job descriptions.

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

## **10. TRAINING**

Induction and training are in line with advice from the Kingston and Richmond Safeguarding Children Partnership.

### **10.1 All Staff**

All new members of staff (including agency, temporary and volunteers) receive appropriate induction training, on commencement of work or prior to that date, on their responsibilities in being alert to the signs

of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or deputy DSLs. This includes those working in EYFS.

The induction training includes:

- This Policy, including information about the identity and role of the DSL and DDSL
- The *Staff Code of Conduct*
- The *Staff Handbook*
- The identity and contact details of the Safeguarding Lead and his/her Deputy
- Child protection training in accordance with Richmond Safeguarding Children Board procedures
- A copy of Part 1 and Annex A of Keeping Children Safe in Education (2020) for school leaders and staff who work directly with children. Other staff members need only read and understand Part 1 but in practice all staff are encouraged to read Part 1 and Annex A.

All staff are also required to:

- Read Part One and Annex A of KCSIE 2020 and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes via email bulletins.
- Understand key information contained in Part One and Annex A of KCSIE. In September 2020 all staff completed a questionnaire detailing understanding of Part One and Annex A of KCSIE 2020 (school leaders and staff who work directly with children are obliged to read and understand Part One and Annex A, other staff need only read and understand Part One).
- Receive training in safeguarding and child protection regularly, in line with advice from the Kingston and Richmond Safeguarding Children Partnership. Training will include online safety. 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. The School provides these via emails, e-bulletins and staff meetings, at least annually.
- A range of appropriate Educare Courses around safeguarding, mental health and welfare.

All adults working at the School are trained to a minimum of the Kingston and Richmond Safeguarding Children Partnership Safeguarding Training: Basic Awareness Level 1. All staff who come into contact with children are trained to the Kingston and Richmond Safeguarding Children Partnership Safeguarding Training Level 2 as expeditiously as possible.

Training also promotes staff awareness of child sexual exploitation, Prevent (including referrals to Channel programmes), so called 'honour based' violence, on-line safety and forced marriage and female genital mutilation. Training on the Early Help Process and process for making a referral to the Single Point of Access Team and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) is also provided, together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals. Staff are made aware of the signs, symptoms and indicators of all forms of abuse and are required to take action *without delay* if such a practice is suspected. We encourage a culture of 'it can happen here' and listening to children and taking account of their wishes and feelings, among all staff, in all measures the School has in place to protect them, and to seek early help.

The DSL has responsibility to ensure these protocols are upheld. These protocols apply to EYFS.

## **10.2 The DSL**

The DSL has attended a child protection training course (Level 3) and receives updated 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 and training in the Kingston and Richmond Safeguarding Children Partnership's approach to Prevent duties; WRAP Awareness Trained (Workshop to Raise Awareness of Prevent).

The School's focus is to support children in need through listening to them and seeking early help and/or inter agency working, including using the Team around the Child Approach and/or Early Help Assessment.

Further details of the required training content for the DSL are set out in Annex B of KCSIE, 2020. The DSL and DDSL job description is available on request.

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. This includes:

- ✓ DSL attends Termly Independent Schools Safeguarding Forum. These are organised by the Kingston and Richmond Safeguarding Children Partnership and respond to local issues as well as national learning via Serious Case Reviews. (ie December 2018: Managing allegations: the role of the LADO)
- ✓ DSL attends relevant CPD provided by Richmond & Kingston Children's Social Care. (ie January 2018: Preventing CSE / November 2018: Why neglect Matters).
- ✓ DSL has completed an extensive range of CPD offered by EduCare: The Prevent Duty / Preventing Bullying / Introduction to CSE / Safeguarding Young People / Child Protection / Online safety / Preventing Bullying / Neglect / Awareness of Peer on Peer Abuse / Sexual Violence & Sexual Harassment between Children & Young People.
- ✓ DSL liaises at least every term with the nominated governor for safeguarding on suitable training.
- ✓ DSL receives weekly & termly online advice regarding online and real world safeguarding issues and advice from eg: Safeguardingschools.co.uk / UK Internet Centre / National Online safety / NSPCC

The learning as gained above is cascaded through the staff community as appropriate.

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

## **11. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Mr Alex Wilson is the board-level Governor with responsibility for safeguarding and child protection in the School. He is a member of the governing body.

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. The Governor with responsibility for safeguarding and child protection issues conducts regular audits of policy and practice; 'stress testing' staff knowledge of safeguarding issues and protocols to follow in the event of a concern being raised.

The School draws on the expertise of staff, including the DSL and DDSLs, in shaping the School's safeguarding arrangements and policies by way of staff meetings and inset day safeguarding training.

If there has been a substantiated allegation against a member of staff, the School will work with Richmond LADO 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.

In addition, the Board of Governors ensures that the School has:

- A DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken the appropriate training (Mr Justin Ryan)
- Child protection policies and procedures which are reviewed annually and made available to parents
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head
- Safer recruitment procedures in line with national guidance
- A training strategy to ensure all staff, including the Head and Governors, receive child protection training, with refresher training at regular intervals in accordance with the Kingston and Richmond Safeguarding Children Partnership requirements
- A nominated Governor to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head. The Acting Chair of Governors should be contacted in this instance on 07539 301063 (Mr Alex Wilson).
- A nominated Governor is responsible for safeguarding and child protection issues. The designated Governor responsible for child protection is Mr Alex Wilson (07539 301063).

The DSL will submit to the Governing Body an Annual Safeguarding Report. This report will allow the Governing Body to ensure the school's compliance, highlight any issues, and plan for improvements. This report will include any safeguarding issues within EYFS. The minutes of the Governing Body's review will accurately reflect the breadth and depth of the review.

## **12. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **12.1 Teaching children how to keep safe**

The Governing Body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours 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 curriculum and is embedded in ICT, PSHE and sex and relationships education (SRE). The School works with pupils, parents and carers alerting them to online safety. Safer use of the internet is taught through lessons, activities and assemblies, and parents are encouraged to make use of websites such as [The UK Safer Internet Centre](#).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School's systems are Paloalto. Such systems aims 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 detail of the School's approach to online safety can be found in the School's Acceptable Usage of Internet and E-Safety Policy (reviewed annually by the Governing Body) which also includes detail on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) 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. The Policies are also included in the pupil's homework diaries.

Staff are equipped with the knowledge to safeguard children online by attending online safety training.

The School's *Acceptable Usage of Internet, E-Safety Policy* also set out the School's approach to online safety. The school's procedures reflect [Teaching Online Safety in Schools, June 2019](#).

## **12.2 Looked After Children**

The School recognises the increased vulnerability of Looked After Children. 'Looked After Children' is generally used to mean those looked after by the local authority. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

The Governing Body 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.

Mr Joe Morris 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.

As such the School will be especially vigilant for signs and symptoms of abuse. The School will ensure it has up-to-date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents / delegated authority / carers.

## **12.3 Arrangements for Visiting Speakers**

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that 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 are 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. The School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being given.

Visiting speakers, whilst on the School site, are supervised by a School employee. Visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School keep a formal register of visiting speakers in line with its Data Protection Policy.

## **12.4 School Trips**

The organising member of staff is responsible for checking safeguarding procedures and appropriate DBS checks as part of the Risk Assessment, carried out prior to the visit. Such Risk Assessments are checked and reviewed by the Health and Safety Officer and the DSL / DDSL where appropriate. Risk Assessments are a vital part of the Health and Safety procedures undertaken prior to these trips. Our policy for *Educational Visits and Residential Trips* is set out in a separate document.

# **13. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

## **13.1 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 (including before school and after school clubs), the School will take steps to check whether those staff are disqualified under the Childcare Act 2006, including by association with others.

All staff at the School are required to notify the School immediately if there is any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association'.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

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 School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration, 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.

The School has a *Safer Recruitment Policy* which ensures operation of safe recruitment procedures and complies with 'Keeping Children Safe in Education' (2018) and Independent School Standards Regulations (ISI).

### **13.2 Use of mobile phones and cameras**

Staff must keep mobile devices out of sight when in contact with children in school, set mobile phones to 'silent' or switch off and not answer calls / SMS messages when in direct contact with children; ensure mobile phones are 'locked' to prevent malicious use if lost / stolen.

Staff who wish to take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school must read and abide by the School's Bring Your Own Device Policy.

Staff who act in breach of this may be subject to disciplinary action.

Mobile phones and cameras are prohibited from use in EYFS.

### **13.3 DSL for the EYFS**

Mr Justin Ryan is the Designated Safeguarding Lead responsible for safeguarding children in the early years setting.

### **13.4 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).

## APPENDIX 1 SIGNS AND TYPES OF ABUSE

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 cyber bullying), 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**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.

### Indicators of Abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed or their abuser has threatened further violence or trauma if they "tell". Staff should familiarise themselves with the range of behavioural indicators of abuse and report any concerns to the designated person.

The government guidance ['What to do if you're worried a child is being abused'](#); advice for practitioners' provides detailed advice on the signs of abuse and neglect to look out for and the action to take if you think a child is being abused or neglected.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather

- Be concerned about changing for PE or swimming
- Look uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy to withdrawn
- Challenge authority
- Become disinterested in their school work
- Be constantly tired or pre-occupied
- Be wary of physical contact
- Be particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children at Tower House day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff will avoid the language of diagnosis but report (to the DSL/DDSL) what we see, not what we think it means

Individual indicators will rarely in isolation provide conclusive evidence of abuse. They should be viewed as part of a jigsaw. What is important is that you report your concerns. You do not need “absolute proof” that the child is at risk.

[The NSPCC website](#) also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer 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 Sexual Exploitation:** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

Children who:

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections or become pregnant;
- suffer from changes in emotional well-being;

- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

**Illegal drug use and child protection:** The discovery that a young person is using illegal drugs is not necessarily sufficient in itself to initiate child protection proceedings but the School will consider such action in the following situations when there is evidence or reasonable cause:

- To believe the young person's drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being prompted by serious parent/ carer drug misuse.

**Children of drug using parents:** Further enquiries and/or further action will be taken when the School receives reliable information about drug and alcohol abuse by parents/carers in the following circumstances:

- The parental misuse is regarded as problematic (i.e. multiple drug use including injection);
- A chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse;
- Pupils are not being provided with acceptable or consistent levels of social and health care;
- Pupils are exposed to criminal behaviour.

**So Called 'Honour Based' Violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Signs of Female Genital Mutilation are most likely to be identified through disclosures, but other indicators can be found on the [NSPCC website](#)

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**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;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying (including peer on peer abuse) without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Statistically children with behavioural difficulties and disabilities are most vulnerable to abuse. Staff who deal with children's special educational needs or emotional and behavioural problems should be particularly sensitive to signs of abuse.

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.

**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 Schools *Missing Child Policy*. All unexplained absences will be followed up in accordance with the Missing Child Policy.

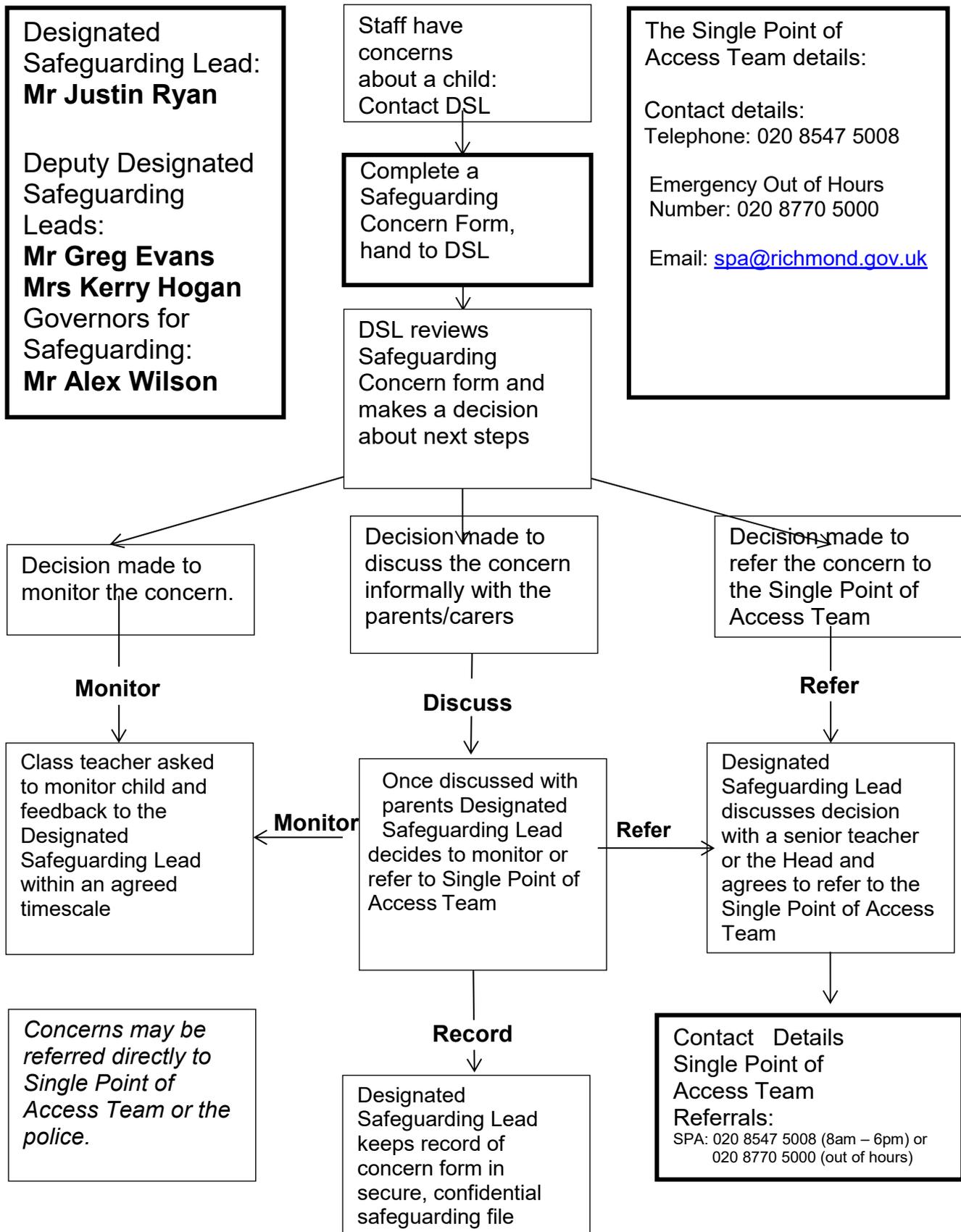
The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the 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 the local authority (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. These intervals are termly or more frequent if repeated incidents arise.

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  
PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD FLOWCHART**



### **APPENDIX 3 OTHER RELATED POLICIES AND DOCUMENTS**

*Anti-Bullying Policy*

*Behaviour and Discipline Policy*

*Bring Your Own Device Policy (BYOD)*

*Data Protection Policy*

*Missing Child (including children missing education) and the process for a Child not Collected on Time*

*Neutral Notification Policy*

*Restraint Policy*

*Safer Recruitment Policy*

*Staff Code of Conduct*

*Staff Handbook*

*Social Medical Policy (within the Staff Handbook)*

*Whistle Blowing Policy (within the Staff Handbook)*

**APPENDIX 4  
RECORD OF CONCERN**

Child's Name :
Child's DOB :
Date, Day and Time of concern :
Your account of the concern :
Additional information : (your opinion, context of concern/disclosure)
Your signature :
Your position in school :
Date and time of this recording :
Action and response of DSL/Alternate Safeguarding Lead
Name: ..... Date:.....

**APPENDIX 5  
TABLE OF SUBSTANTIVE CHANGES FROM SEPTEMBER 2017**

<b>Where</b>	<b>Change</b>	<b>Date</b>
Key School Contact Details Page 3	Mr J Morris is responsible for looked after children	From November 2017
Throughout	NCTL replaced by Teaching Regulation Authority TRA	September 2018
Throughout	Chair of Governors replaced by Acting Chair of Governors, Alex Wilson	September 2018
Throughout	KCSIE 2016 to KCSIE 2018 Working Together 2015 to Working Together 2018	September 2018
Throughout	Richmond Safeguarding Children Board threshold document replaced by Multi-agency Threshold Document 2018	September 2018
Page 11	Behaviour towards a child indicates the child would pose a risk to <i>may</i> pose a risk	September 2018
Page 12	Allegations proven to be found 'unfounded' included in text	September 2018
Page 15	Common Assessment Framework replaced by Early Help Assessment	September 2018
Page 18 and 19	Reference to 'by association requirement if you live in the same household as someone disqualified' removed	September 2018
Section 6 amended	To include more detail on child on child sexual violence and how to manage it	September 2018
Throughout	KCSIE 2018 updated to KCSIE 2019	September 2019
Throughout	LSCB renamed Kingston and Richmond Safeguarding Children Partnership	September 2019
Section 2	Joe Morris now H&S Officer	September 2019
Section 4	Radicalisation added as a form of abuse	September 2019
Section 5	Paragraph regarding the non-disclosure of staff identity during a disclosure added.	September 2019
Section 5.6	Section on Serious Violence added	September 2019
Section 6	Details of Upskirting, sexting and initiation/hazing included as forms of peer on peer	September 2019

	abuse. Paragraph stating imagery of sexting should not be viewed by investigating staff included.	
Section 12	Reference to Teaching Online Safety in Schools, June 2019 added	September 2019
Throughout	Cyber bullying reference in Anti bullying policy, not in a separate policy	January 2020
Throughout	Updates to reflect amendments in updated KCSIE September 2020	September 2020