

# Tower House School

## Safeguarding and Child Protection Policy

This policy applies to the Whole School, including EYFS

Date Revised:	September 2021
Reviewed by:	Governing Body
Date Approved by Governing Body:	Spring 2021
Review Schedule:	Annually, Spring 2022
Circulation:	Governors, all staff, parents, contractors, volunteers, school website
ISI Document Code:	7a
Date of most recent inspection:	Compliance Inspection, March 2019
Reported findings relating to safeguarding	The ISI report from the Regulatory Inspection of March 2019 records: 'Met' on all of the 8 Parts

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## 1. KEY EXTERNAL CONTACT DETAILS

	Telephone No.	Email	Website
Kingston and Richmond Safeguarding Children Partnership	0783 4386459	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 Out 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	<a href="mailto:extremism@education.gsi.gov.uk">extremism@education.gsi.gov.uk</a>	
NSPCC Whistleblowing Advice Line & NSPCC Report Abuse in Education Advice Line	0800 028 0285	help@nspcc.org.uk	
Disclosure and Barring Service	03000 200 190	customerservices@db.s.gov.uk	
Teaching Regulation Authority (TRA)	020 7593 5393	misconduct.teacher@education.gov.uk	
OFSTED Safeguarding Children	0300 123 4666 (Monday to Friday: 8am-5pm)	<a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>	

## 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 and looked after children	Mr Joe Morris	07863 793061	morris@thsboys.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mr Gregory Evans	07739803453	head@thsboys.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mrs Anna Patel	07930 391119	patel@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 2021')
  - [Disqualification under the Childcare Act 2006 \(September 2018\)](#)
  - [What to do if you are worried a child is being abused \(March 2015\)](#) advice for practitioners
  - [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice \(September 2021\) \("SVSH"\)](#)
  - [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 child care providers \(August 2015\)](#)
  - [The use of social media for on-line radicalisation \(July 2015\)](#)
  - [Relationships education, relationships and sex education \(RSE\) and health education \(July 2020\)](#)
  - [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(December 2020\)](#)
  - [The Charity Commission guidance Safeguarding and protecting people for charities and trustees \(October 2019\)](#)

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.

## 4. CONCERNS ABOUT A CHILD

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. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

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 2021). 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 and are encouraged to raise any concerns directly with the school, if necessary using this policy. 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.

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 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.

## 5. 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 as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## 6. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

This includes EYFS.

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

The guidance, [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- 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. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

The safeguarding concern form contains:

- 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, kept confidential and stored securely with the DSL who will ensure the file is only accessible to those who need it and is shared in accordance with the guidance set out in Parts one and two of KCSIE 2021.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

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

The School manages this ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

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 (Anna Patel SENCO) 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

### **6.1 Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **6.2 Early Help**

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

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

- Is persistently absent from education, including persistent absences for part of the school day.

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.

### **6.3 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.

### **6.4 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. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. 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.

### **6.5 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](#).

### **6.6 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 Prevent referral 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.

## **6.7 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>.

## **6.8 What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

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.

If staff 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.

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](#)

## **6.9 How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance " Sharing nudes and semi-nudes: advice for education settings working with children and young people " (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

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

A child going missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues including abuse, neglect, sexual abuse, and child sexual and/or criminal exploitation.

It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future.

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.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

### **6.11 What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **6.12 What staff should do if a child requires mental health support**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. The School has a PSHE Policy in place and also diarises wellbeing and mental health initiatives across all year groups.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

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

If staff have concerns about another staff member, including agency staff, volunteers and contractors, 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 8) 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.

#### **6.14 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.

### **7. ARRANGEMENTS FOR DEALING WITH PEER ON PEER ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Peer on peer abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

These arrangements apply to all reports and concerns of peer on peer abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of peer on peer abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted via posters around school in a format that is easily accessible and easily understood by children.

#### **7.1 Disclosure**

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse

verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to peer on peer abuse and can recognise the indicators and signs of peer on peer abuse and know how to identify it and how to respond to reports.

A first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children to be provided by Anna Patel (SENCO) who has had mental health first aid training.

Certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

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.

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 will have regard to the procedures set out in KCSIE and the SVSH at all times.

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 child 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.

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

The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Richmond Single Point of Access Team referral process – however, anyone can make a referral.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

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](#).

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.

In the event of disclosures about peer-on-peer abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and/or Head and support from external agencies will be sought, as appropriate.

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 child 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.

## 7.2 Risk Assessment

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

When there has been a report of sexual violence, the DSL (or DDSL, Headmaster) should make an immediate risk and needs assessment in writing and this will be kept under review.

In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support. The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

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

## **8. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS)**

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 2021 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, including behaviour that may have happened outside of school.

Allegations that do not meet the above harms test should be dealt with using the school's procedure for handling low level concerns set out below.

Allegations against a member of staff who is no longer at the School should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the school will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation.

The School should not undertake their own investigation of the 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.

When dealing with allegations about a staff member, the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

- a) Concerns including 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 or DSL is the subject of the allegation or concern, the Head or DSL 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.
- b) 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, or it is an emergency situation, the case manager should contact children's social care and as appropriate 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. The DSL is responsible for ensuring the child is not at risk.
- c) Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to children's social care.
- d) When to inform the individual, who is the subject of the allegation will be considered on a case by case basis and with guidance from the designated officer, and if appropriate, the police and/or children's social care. Subject to any objection, 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. 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.
- e) The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the designated officer, WT and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
- f) Where further enquiries are required to enable a decision about how to proceed, the designated officer and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
- g) 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. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

- h) The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
- i) The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- j) On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

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

Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references.

If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; 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.

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

## **9. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTED STAFF**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

## **10. ARRANGEMENTS FOR DEALING WITH LOW LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)**

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the

School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The School's code of conduct can be found on Engage. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the DSL (or a deputy) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the DSL, it should be shared with the Head. If the low-level concern relates to the Head, it should be shared with the Chair of Governors. A form for a low level concern can be found in Appendix 5.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the DSL will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing by the DSL. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 10 years or until the individual has left retired, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or deputy), and/or the Head. The concern will be recorded in accordance with the School's low-level concern, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

## 11. 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*.

## 12. SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

### Allegation

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

### Low-Level Concern

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

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

### Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

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.

### **13. MANAGEMENT OF SAFEGUARDING**

Mr Joe Morris Head of Sport, is the School's Designated Safeguarding Lead (DSL). He is the main DSL for the School, including EYFS.

Mr Gregory Evans, Head and Mrs Anna Patel, SENCO, 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 take lead responsibility for safeguarding and child protection matters in the School.

The DSL's responsibility is to:

- Maintain an overview of safeguarding within the School
- To open channels of communication with local statutory agencies
- Refer incidents to third parties (including local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties
- To monitor the effectiveness of the School's policies and procedures in practice.
- 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
- 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 and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also

consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard the child and to help them thrive in school.

- 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.

The DSL or Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with WT. "NPCC - When to call the police" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do.

The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health

Whilst the Head should ensure that the policies and procedures adopted are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found in [Annex C of KCSIE 2021](#).

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

## **14. TRAINING**

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

### **14.1 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 the policy and procedures to deal with peer on peer abuse.
- Information about the identity and role of the DSL and DDSL
- The *Staff Code of Conduct*
- The *Staff Handbook* including the whistle blowing procedure, acceptable use of technologies and staff/pupil relationships and communications including the use of social media

- Child protection training in accordance with Richmond Safeguarding Children Board procedures
- A copy of Part 1 and Annex B of Keeping Children Safe in Education (2021) for school leaders and staff who work directly with children. Staff members that do not work directly with children need only read and understand Annex A but in practice all staff are encouraged to read Part 1 and Annex A and B.
- The *Behaviour Policy* including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- The safeguarding response to children who go missing from education.

All staff are also required to:

- Read Part One of KCSIE 2021 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 of KCSIE. In September 2021 all staff completed a questionnaire detailing understanding of Part One of KCSIE 2021 (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 Annex A).
- 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 and harmful sexual behaviours (including peer-on-peer sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. 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.

#### **14.2 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 C of KCSIE, 2021. 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. In particular the school will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

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.
- ✓ DSL attends relevant CPD provided by Richmond & Kingston Children's Social Care
- ✓ 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.

## **15. 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.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. 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, including lessons learnt. 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 Joe Morris)

- 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.

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

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

The Governing Body ensures that all pupils are taught about safeguarding, including online safety, 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.

The school recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

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; restrict access to online risks such as online gambling, phishing or financial scams; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. We recognise however that children have unlimited and unrestricted access to the internet via mobile phone networks (ie 3G, 4G, 5G) which means that children may consensually and /or non consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

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](#).

### **16.2 Relationships and Sex Education ("RSE")**

RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE. RSE will form part of the School's PSHE programme.

### **16.3 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.

### **16.4 Arrangements for Visiting Speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to 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.

### **16.5 Off-site tuition, performances away from school**

In addition to the measures above 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.

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

### **17.1 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. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the School's *Safer Recruitment Policy*.

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

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified.

Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the DSL when appropriate.

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.

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).

### **17.2 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.

It is good practice at times to record photographic and video images of pupils, or to allow pupils to record images of each other to assist teaching and learning, or to celebrate achievement. There is, however, potential for images of children to be misused, in extreme cases for pornographic or grooming purposes.

All staff, including those in EYFS, therefore adhere to the following code:

- only record images when there is a justifiable need;
- ensure that pupils understand the reason for the recording of the images and how the images will be used and stored;
- ensure that all images recorded are available for scrutiny;
- avoid making recordings in one-to-one situations;
- on admission to the School, parents give consent that images and recordings of their children can be used for legitimate reasons;
- if a photograph is used, the pupils should not be named without direct parental consent; and
- where the School has decided that images should be retained for future use, they should be stored and used only by those authorised to do so.
- School tablets using 2 Simple software and personal mobile devices are the agreed media for EYFS staff to take photographs of pupils (in the case of the latter any photographs are immediately deleted from the personal device). All these devices are securely locked via password protection
- Before deletion from personal devices images are transferred to a secure database on the school (internal) drive"
- Unless the device is being used to record activity the camera lens on the phone should be covered with a neon sticker to disable the camera function.

### **17.3 DSL for the EYFS**

Mr Joe Morris is the Designated Safeguarding Lead responsible for safeguarding children in the early years setting.

### **17.4 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 and cannot be covered by one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL or deputy.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or deputy).

**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 (including through corporal punishment). 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 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.

Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as peer on peer abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of

behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the SVSH advice.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the SVSH advice.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or

buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

**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.

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**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 abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting.

Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); 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; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child Sexual Exploitation (CSE):** is a form of child sexual abuse (see above which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

The below CCE indicators can also be indicators of CSE, as can:

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

The DfE has published guidance on this entitled "Child sexual exploitation: guide for practitioners". CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

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

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes, and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture

drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (June 2021)".

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
  - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
  - making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

**Mental health:** all staff should 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children 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.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

**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.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School's local safeguarding procedures.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13.

**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 [fmu@fco.gov.uk](mailto:fmu@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.

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with special influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). 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 Prevent referral. Staff should contact the DSL or DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school. For example, information that would allow the new school to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

**Special Educational Needs and/or Disabilities (SEND) or pupils with certain health conditions:** Pupils with SEND or certain health conditions can face additional safeguarding challenges. These Children may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice based bullying) without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

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

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

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. The school is part of Operation Encompass and both the DSL and DDSL are on the email list to receive regular updates.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who go missing from school:** A child going missing from school is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honor based' abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently.

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. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

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

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

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

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

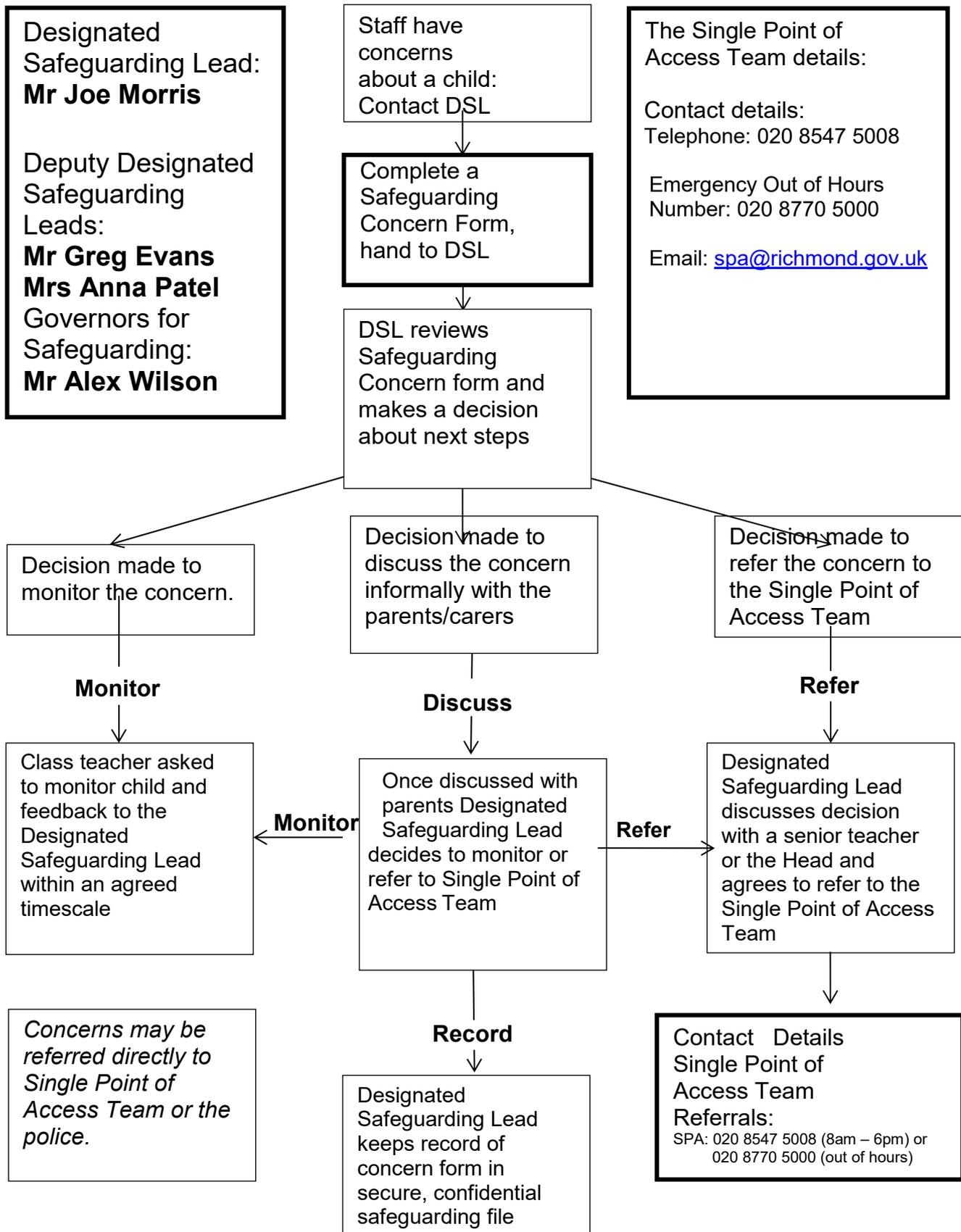
**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

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

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

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

**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*

*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  
LOW LEVEL CONCERNS FORM AND CLARITY ON LOW LEVEL CONCERNS**

Low Level Concern Form	
Name	
Role	
Date and time of completing this form	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Detail of concern	
<p><i>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</i></p>	
Details of any children or young people involved	
Name	
For use by DSL / DDSL upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow up	

**Allegation**

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

**Low-Level Concern**

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

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

**Appropriate Conduct**

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

**APPENDIX 6  
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
Throughout	Updates to reflect amendments in updated KCSIE 2021	September 2021