



**ALLEYN'S SCHOOL**  
**SAFEGUARDING AND CHILD PROTECTION POLICY**

<b>Name of Policy</b>	Safeguarding and Child Protection Policy
<b>ISI Regulation</b>	Part 3: Welfare, Health and Safety and other legislation; 7a
<b>Reviewed by</b>	Alleyne's Governing Board
<b>Author/SMT</b>	Mr AW Skinnard, Senior Deputy Head
<b>Date of school review</b>	November 2021
<b>Date of next school review</b>	September 2022

**This policy applies to both the Junior and Senior Schools.** It includes those pupils in the Early Years Foundation Stage (EYFS). The policy is applicable to all on and off-site activities undertaken by pupils while they are the responsibility of the School.

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## 1. APPLICATION

This policy applies to all pupils of Alleyn's School, including those pupils in the Early Years Foundation Stage (EYFS). It applies to all members of staff and volunteers and is applicable whenever pupils are the responsibility of the School, including when activities take place off site. When the word 'staff' is used this includes all members of staff including governors, self-employed staff, contractors, volunteers, students and those on work experience. This policy is kept up to date in response to emerging/evolving issues or lessons learnt. This policy is published on the School's website and printed copies are also available to parents on request. An 'Alleyn's Post' with a link to this policy is sent at the start of the academic year to all parents, and explains where to find the policy.

*We note the DfE's updated contingency framework Managing coronavirus (COVID-19) in education and childcare settings, which includes the new thresholds at which we might consider seeking public health advice and take further action to reinforce measures already in place, updates to the circumstances in which local health protection teams or directors of public health might recommend us to introduce some additional measures, and annexed guidance for managing cases. We note, in particular, the sections of the Guidance on 'Safeguarding and designated safeguarding leads' and 'Vulnerable children and young people' under 'Other considerations where attendance has been restricted'. We also note the Government's updated Actions for schools during the coronavirus outbreak/Actions for early years and childcare providers during the coronavirus (COVID-19) outbreak.*

## 2. KEY SCHOOL PERSONNEL

Role	Name	Title	Contact details
<b>Designated Safeguarding Lead (DSL)</b> whole school <b>Prevent Lead</b> whole school	<b>ANDY SKINNARD</b>	Senior Deputy Head Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a> 0208 557 1457  Office is behind Reception, ask at Reception desk
<b>Deputy Designated Safeguarding Lead (DDSL)</b> Senior School	<b>ROB ATKINSON</b>	Assistant Head, Head of Upper School Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a> 0208 557 1485  Office is on the first floor of the EAB, opposite the sectional administrators' office
<b>DDSL</b> Senior School	<b>MEL JOEL</b>	Assistant Head Head of Middle School Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a> 0208 557 1014 Office is on the first floor of the EAB, next to the sectional administrators' office
<b>DDSL</b> Senior School	<b>LIZ THORNTON</b>	Assistant Head Head of Lower School Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 8032 Office is in the LS building, first floor
<b>DDSL</b> Junior School (Reception to Year 6) including specific responsibility for EYFS pupils	<b>SIMON SEVERINO</b>	Head  Alleyn's Junior School Member of SMT	<a href="mailto:jssafeguarding@alleyns.org.uk">jssafeguarding@alleyns.org.uk</a> 0208 557 1495  Office is at the end of the corridor immediately after the Reception area of the AJS building
<b>DDSL</b> Junior School (Reception to Year 6)	<b>ERICA OLLEY</b>	Deputy Head  Alleyn's Junior School	<a href="mailto:jssafeguarding@alleyns.org.uk">jssafeguarding@alleyns.org.uk</a> 0208 557 1536  Office is along the corridor immediately after the Reception area of the AJS building

<b>DDSL</b> Whole school Support Staff	<b>DAVID WICKSTEED</b>	Human Resources Consultant	<a href="mailto:hr@alleyns.org.uk">hr@alleyns.org.uk</a> 0208 613 5004 Office is opposite D1 in the corner of the C Block in the Senior School
<b>Link Governor</b> for Safeguarding Whole School, including those pupils in the EYFS	<b>PROFESSOR FRANCES BOWEN</b>	Governor	<a href="mailto:safeguardinglink@alleyns.org.uk">safeguardinglink@alleyns.org.uk</a>

The Chair of Governors is **Mr Iain Barbour**. He may be contacted c/o Clerk to the Governors, Mrs M McGregor, Alleyn's School, Townley Road, Dulwich, London SE22 8SU at [Clerk@alleyns.org.uk](mailto:Clerk@alleyns.org.uk)

### 3. KEY PERSONNEL - EXTERNAL AGENCIES

The School's Local Safeguarding Children Partnership (LSCP) is Southwark, which operates the Southwark Safeguarding Children Partnership following the guidance of the wider London Safeguarding Children's Partnership.

For any concerns regarding pupils the School would usually contact the Children's Services Department of the borough in which the pupil resides.

For any concerns relating to staff the school will always contact the LADO for Southwark.

***It is the policy of the School that referrals about pupils are made by the DSL; however, anyone may make a referral and staff may raise concerns directly with Children's Services. If there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services immediately or by calling the police on 999.***

Title	Name	Purpose	Contact details
<b>Southwark Multi-Agency Safeguarding Hub (MASH)</b>	Duty worker	For concerns about a pupil	<b>020 7525 1921</b> <b>Out of hours: 0207 525 5000</b> <a href="mailto:mash@southwark.gov.uk">mash@southwark.gov.uk</a>
<b>Southwark Schools Safeguarding Coordinator</b>	<b>Apo Cağirici</b>	Advice for schools and Schools Safeguarding Coordinator	<b>020 7525 2715</b>
<b>Local Authority Designated Officer (LADO)</b>	<b>Eva Simcock</b>	For concerns about an adult relating to their work with children	<b>020 7525 0689</b> <a href="mailto:Eva.Simcock@southwark.gov.uk">Eva.Simcock@southwark.gov.uk</a> Head of Social Work Improvement and Quality Assurance, Sumner House, Sumner Road, London SE15 5QS
<b>Children's Social Care Services</b>	Duty worker	For concerns at any stage unable to be dealt with by the offices above	From 9am-5pm: <b>020 7525 1921</b> Out of hours: <b>020 7525 5000</b>
<b>Early Help service</b>	Duty worker	For concerns that may not require referral, but meetings or mediation	<b>020 7525 2714</b> <a href="mailto:EarlyHelp@southwark.gov.uk">EarlyHelp@southwark.gov.uk</a>
<b>Southwark Safeguarding Children Partnership</b>	Interim Chair: David Quirke-Thornton		<b>020 7525 3306</b> <b>Southwark Council, PO Box 64529, London, SE1 2TZ</b> <a href="http://southwark.gov.uk/safeguardingchildren">southwark.gov.uk/safeguardingchildren</a>

**Other external referral and advice contacts:**

<b>Metropolitan Police</b>	Child Abuse Investigation Team	020 7230 3700
<b>Prevent Duty</b>	Department for Education helpline	020 7340 7264
<b>Forced Marriage Unit</b>	Advice for staff	020 7008 0151
<b>CAMHS</b>	Duty practitioner for mental health	020 3228 6000/7777
<b>SLAM (CAMHS in Southwark)</b>	Mental health crisis number	0800 731 2864
<b>Mental Health out of hours</b>	24 hour coverage for concerns	0800 731 2864
<b>NSPCC Child Protection Helpline</b>	24-hour freephone service for adults, children or young people for advice or to give details about a child who may be at risk	0808 800 5000
<b>ChildLine</b>	24-hour freephone for children and young people who need advice	0800 1111
<b>Family Lives</b>	A freephone advice line for parents	0808 800 2222
<b>NSPCC whistleblowing helpline</b>	Available for staff who do not feel able to raise concerns regarding child protection failures internally	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Public Concern at Work</b>	Available for staff who are concerned about management of safeguarding issues	020 7404 6609 <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a>

**4. LEGAL FRAMEWORK**

This policy pays due regard to:

- DfE statutory guidance *Keeping Children Safe in Education* (Sep 2021)
- Guidance contained in *Working Together to Safeguard Children* (Updated 2020)
- Pan London Child Protection Procedures and Practice Guidance (September 2021)
- Guidance from the local authority: Southwark Safeguarding Children Partnership (SSCP)
- Prevent Duty Guidance for England and Wales (revised July 2015)
- Statutory Framework for the Early Years Foundation Stage (2021)
- *Sexual violence and sexual harassment between children in schools and colleges* (September 2021)

A full list of all documents and guidance informing this policy may be found in Appendix 3.

#### 4.1 Links with other school policies

Safeguarding and the well-being of pupils permeates all aspects of school life and this policy links to many other policies in the Senior (SS) and Junior (AJS) Schools. These include, but are not limited to:

- Pupils' Social Emotional Wellbeing and Mental Health Policy (SS)
- Missing child
- IT and E-safety/Online safety (AJS) and Acceptable Use Policies for staff and pupils
- Pupil Code of Conduct/Golden Rules (AJS)
- Staff Code of Conduct (AJS)/ Staff Code of Practice (SS)
- Anti-bullying and Harmful Peer Relations
- Educational Visits
- Use of Physical Force/Restraints (AJS)
- Complaints
- Whistleblowing
- Equal Opportunities
- Rewards and Sanctions/Recognition (AJS)
- Exclusion
- Recruitment
- New staff induction
- First Aid
- Health and Safety

#### 5. POLICY STATEMENT AND AIMS

**Alleyn's School fully recognises its responsibility to safeguard and promote the welfare of its pupils. It endeavours to ensure that they are protected from any form of abuse or neglect, including abuse through the use of technology. The School promotes a climate of openness where anyone in the community can share their concerns freely, and it supports the personal development of pupils in order to foster security, confidence and independence. It acknowledges that safeguarding incidents can happen anywhere and that everyone in the staff community must take responsibility for safeguarding, ensuring that they *always act in the best interests of the child*.**

The purpose of this policy is to:

- Identify the names of responsible persons in the school and explain the purpose of their role
- Outline the role of the governing board
- Describe what should be done if anyone in the School has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed 'vulnerable'
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, *e.g.* volunteers, contractors
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Set out expectations in respect of training
- Clarify how children will be kept safe through the everyday life of the school
- Outline how the implementation of this policy will be monitored.

## 6. CORE PRINCIPLES

- The welfare, well-being and safety of pupils is at the heart of the school and is always afforded the highest priority.
- The school protects all pupils regardless of age, gender, ability, disability, race, language, ethnicity, religion or sexual identity.
- The school actively promotes a culture of openness where all members of the school community, both staff and pupils, are able to raise concerns with the confidence that they will be listened to and taken seriously.
- The school emphasises that all staff, both teaching and non-teaching, have an equal responsibility to report any concerns they may have about a pupil or about the conduct of another member of staff, and that they must adopt an 'it could happen here' attitude.
- There are clear processes in place to identify, assess, and support pupils.
- The School is committed to inter-agency working, as detailed in *Working Together to Safeguard Children* (July 2018), and will liaise closely with other agencies. This includes Children's Services, the Local Authority Designated Officer (LADO), the police, health and mental health services and any other agencies which may be involved with its pupils.
- The curriculum and co-curriculum give pupils opportunities to develop the knowledge and personal skills needed to recognise and stay safe from abuse, including abuse and exploitation through the use of technology.
- Appropriate filtering and monitoring systems are in place to minimise risks to pupils online
- Safer recruitment procedures are practised in accordance with the requirements of *KCSIE* (Sep 2021) and *Disqualification under the Childcare Act 2006* (DfE, Sept 2018) and the School's own Recruitment Policy.
- The DSL and other senior leaders report to the School's governors at least termly. In addition, there is an annual review of this policy and associated practice and procedures.

## 7. AIMS

The School aims:

- to promote a strong safeguarding culture which enables all pupils to feel secure
- to support pupils' personal development in ways that will foster self-esteem, self-confidence and independence<sup>[1][2][SEP]</sup>
- to ensure that pupils know how to approach adults if they – or those they know – are in difficulties, and understand that they will be listened to and their concerns taken seriously
- to provide early help to pupils and families
- to identify, support and refer those pupils who may need additional support from agencies other than Children's Services, eg Child and Adolescent Mental Health Services (CAMHS)
- to provide all staff with the appropriate training so they are well-informed and confident about their responsibility to identify and report any concerns about pupils relating to possible harm or abuse, including through the use of technology
- to ensure staff understand their responsibility to report any concerns about the actions of members of staff, volunteers or visitors
- to ensure that there is effective and timely communication between staff with sensitive information known to the school disseminated to staff on a 'need to know' basis<sup>[1][2][SEP]</sup>
- to ensure that safeguarding procedures are followed by all staff in accordance with the School's policy, national guidance and locally agreed procedures
- to provide appropriate support to any staff or pupils who may be involved in safeguarding or child protection issues.

## 8. THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL) AND THE DEPUTY DSLs

The DSL is the Senior Deputy Head, Mr Andy Skinnard, and he takes lead responsibility for safeguarding and child protection, including online safety throughout the whole school. There are also a number of Deputy DSLs who work in various departments across the senior school. In the Junior School, the Head is one of two DDSLs (along with the Deputy Head) and he has specific responsibility for pupils in the EYFS. The DSL and the DDSL, Head of the Junior School are members of the Senior

Leadership Team. The DDSLs are members of the Senior Management Team.

The DSL takes the lead responsibility for safeguarding and child protection (including online safety) and works with members of staff whose roles include promoting the good mental health of the pupils. The DSL provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children. The DDSLs deputies are all senior members of staff and have the training and authority to take a leading role for matters relating to the welfare of pupils, including child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, and this lead responsibility should not be delegated. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the School to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

The broad areas of responsibility for the designated safeguarding lead (DSL) are as follows.

#### **8a Raise awareness**

- a) Promote a strong safeguarding culture throughout the school so children are more likely to share concerns and know they will be listened to and taken seriously.
- b) Ensure the Safeguarding Policy is known, understood and used appropriately
- c) In conjunction with the School's governors, ensure the Safeguarding Policy and procedures are reviewed at least annually and additionally in the case of a serious incident or change in legislation, and that any necessary changes are implemented without delay.
- d) Ensure the Safeguarding Policy is published on the school's website and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- e) Promote educational outcomes by sharing information appropriately about the welfare, safeguarding and child protection issues that pupils are experiencing or have experienced.
- f) Ensure good communication and that staff are alert to the specific needs of particular pupils *e.g.* those with special educational needs or young carers. Analysing trends to ensure they are not at further disadvantage.

#### **8b. Work with others**

- a) To be the first point of contact for pupils, staff, parents for all matters related to safeguarding, including when there are concerns that pupils and/or families may require 'early help'
- b) Act as a point of contact for the three safeguarding partners: Children's Services, Health and the Police
- c) Act as a source of support, advice and expertise to staff, including when deciding whether to make a referral to a relevant agency and when referrals are made
- d) Meet regularly with the DDSLs in both the Senior School and Junior School in order to assess current safeguarding concerns, to maintain consistent practice and to promote a strong safeguarding culture throughout the school
- e) Compile a weekly list of safeguarding concerns for a regular meeting with the Head in management of concerns
- f) Liaise with all staff (especially pastoral support staff, school nurses, counsellors and SENCOs) on safeguarding matters
- g) Provide regular updates, shared by various media, to keep staff informed, between specific training sessions, about safeguarding issues;
- h) To be responsible for overseeing online safety in the School with the support of the School's Director of IT Strategy and the Junior School Computing Coordinator
- i) To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
- j) When children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This is transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt.
- k) Ensure a request is made to the schools/nurseries of pupils joining the School for any



safeguarding information.

- l) Report regularly to the Link Governor for safeguarding, compiling reports with the Link Governor for briefings to governors at Board meetings.

### **8c. Manage referrals**

- a) Upon the receipt of any report of concerns of possible abuse, to act upon the report immediately and no longer than the same working day
- b) Refer and seek advice from Children's Services on all cases of possible abuse
- c) Refer cases to the Channel programme where there is a radicalisation concern
- d) To keep detailed, accurate records of all concerns and referrals, including concerns where there has been no requirement to make a referral
- e) refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- f) refer cases where a crime may have been committed to the Police
- g) Inform the Head and Safeguarding Governor within one working day of any referrals (and contact lawyers for advice where appropriate)

### **8d. The role of the Deputy DSLs**

The role of the DDSLs is to:

- a) Be a significant influence in promoting the culture of safeguarding and child protection within the school
- b) Act as a deputy for the DSL, and at all times being available to any staff (including when the DSL is present) who wish to share concerns about the welfare of pupils
- c) To take particular responsibility for safeguarding within their section of the school and convey relevant information to the DSL for safeguarding records
- d) To convey any information to the DSL no later than the same working day
- e) In the absence of the DSL to take the lead role, ensuring that the DSL is fully briefed of any matters which have arisen on his return.

## **9. EARLY HELP**

Early help means providing appropriate support for a child or family as soon as a problem is apparent, regardless of the child's age. The aim is for targeted early intervention before difficulties escalate. An early help inter-agency assessment is arranged through Southwark LSCP and draws upon a range of support services available to families e.g. support concerning physical/mental health, parenting, domestic abuse, school attendance. Further information can be found at:

<https://www.southwark.gov.uk/childcare-and-parenting/children-s-social-care/family-early-help-feh>

Any pupil may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a pupil who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory EHC Plan)
- 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
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, eg drug & alcohol misuse,
- adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care is
- a privately fostered child

A lead professional undertakes the Early Help assessment. Who performs this role is decided on a case-by-case basis. Early Help requires parental agreement and engagement, but if parents do not consent to an early help assessment, then a judgment will be made as to whether this will cause the situation to deteriorate further. If this is the case, then a referral to Children's Services may be made. The school's pastoral support systems, school nurse, chaplain and counselling services are also an integral component of early help within the school.

## **10. LISTENING TO CHILDREN**

The School encourages its pupils to talk to a member of staff when they have concerns about themselves or others. In each Tutor Room and classroom there is a notice giving details of who pupils may contact if they are unsure who to approach. In addition, pastoral staff remind their pupils that they are encouraged to speak to members of staff about any concerns, and these will be taken seriously. The School also advertises the offices of the Chaplain, the Assistant Chaplain, the School Counsellor and Assistant Counsellor, and how pupils may make contact with these members of staff.

### **10.1 Pupils with SEND**

The School regularly offers training for staff in issues applicable to special educational need and disability (SEND) and any staff working with children with a disability receives appropriate briefings from staff both in and outside of the School. Alwyn's recognises the increased vulnerability of pupils with SEND to possible bullying and safeguarding concerns, and the DSL regularly confers with the Head of Learning Support and other relevant pastoral staff to ensure support of pupils with SEND. On the safeguarding register there is also a column to identify if the child listed is also on the register of those with a special educational need.

### **10.2 Vulnerable Pupils**

Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a looked-after child, this will also be brought to the notice of the Local Authority DSL Designated Person with responsibility for children in public care.

Local authorities should share with the School the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. The School acknowledges the additional need for support and protection of children who are vulnerable by virtue of disability, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions and pupils who are excluded from school.

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's [\*SEND Code of Practice 0 to 25\*](#) and [\*Supporting Pupils at School with Medical Conditions\*](#).

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

The School also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from

school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

## **11. THE CURRICULUM**

The School acknowledges the importance that the curriculum plays in the prevention of abuse and in the preparation of pupils for the responsibilities of adult life and citizenship. The School ensures that children are taught about safeguarding, including online safety, as part of its broad and balanced curriculum. As appropriate, the curriculum is used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. Central to this is the work of the Head of PSChE (the PSHE Coordinator in the Junior School), but all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils.

Alleyn's displays its 'Vision and Values' prominently in both Senior and Junior School classrooms. It emphasises the importance of its values and positive school ethos with a central theme of respect for others as part of its promotion of fundamental British values.

The School regularly discusses how children can keep safe online and in their use of social media. The Senior School has a system of Digital Mentors, where older pupils guide younger ones, advising them on safe activity when online. All pupils sign an 'Acceptable Use of IT' form which – for older pupils – includes mention of mindful behaviour online and in social media, and also mentions fundamental British values.

There is monitoring and filtering of IT, run by the IT Manager, in line with the School's IT and E-safety Policy. The School is careful that this filtering will not lead to unreasonable restrictions on the pupils' ability to be taught about matters online and on safeguarding issues.

The School also considers how the curriculum and co-curriculum can help in promoting a healthy school by:

- developing a School ethos and environment which encourages safe and healthy lifestyle for pupils
- ensuring that food and drink available across the school day reinforce the healthy lifestyle message
- covering relevant issues through Relationships Education (AJS) and Relationships and Sex Education (SS) delivered through the PSChE programme in both the AJS and Senior School
- providing high quality Physical Education and sport to promote physical activity
- appreciating a sense of 'the other' aside from purely materialistic interpretations of the meaning of life, enabling an appreciation of what constitutes a spiritual understanding
- encouraging a sense of gratitude for the opportunities offered in the community of Alleyn's and the wider British society
- promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and well-being both as an individual and as part of wider modern British society

### **11.1 School residential trips**

The Senior Deputy Head (DSL) and the Deputy Head of the AJS (DDSL) routinely sign off all trips involving any overnight staying. If a pupil on the Safeguarding list of concerns is included in that trip, the Senior Deputy and Deputy Head of the AJS will consult with the relevant member of staff so that proper support of the pupil (which might involve not allowing him or her to take part due to concerns about welfare) can be guaranteed.

## **12. CATEGORIES OF ABUSE**

Knowing what to look for is vital for early identification. All staff should be aware of indicators of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are ever unsure or have any concerns whatsoever, they must **always** speak to the DSL or a DDSL.

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

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

### 12.1 Definition of Abuse:

*A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. KCSIE (Sep 2021)*

### 12.2 Categories of Abuse

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**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, for example, 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.

**For more information see:** *What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners* <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> This gives additional information and examples of potential indicators of abuse and

neglect. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

### **13. SPECIFIC SAFEGUARDING ISSUES**

Staff must also be aware of other safeguarding issues which can be found in *KCSIE and Annex A*.

These include

- Mental health
- Peer on peer/child on child abuse
- Sexual violence and sexual harassment between children
- Children who are sexually active
- Upskirting
- Domestic abuse
- Child sexual exploitation
- Child criminal exploitation & County lines
- Preventing radicalisation
- Children missing from education
- Homelessness
- So-called 'honour-based' violence
- Female Genital Mutilation
- Children and the court system
- Children with family members in prison

**More detailed information on all these matters may be found in Appendix 4**

### **14. PROCEDURES IF STAFF HAVE A CONCERN ABOUT A PUPIL OR IF A PUPIL DISCLOSES INFORMATION**

***Staff must always act in the best interests of the child.***

The School has a responsibility to protect all pupils in its care and all staff share the duty to safeguard and promote the welfare of pupils. The term 'welfare' is taken to embrace health, happiness, development (physical, intellectual, social and behavioural) as well as protection from the risk of suffering harm. This applies equally during the school day and during out-of-school activities, including visits over the weekend and holidays, or term-time residential trips off-site. The welfare of the pupils at home, or when they are not under the responsibility of the School, is also included if this comes to the attention of the school.

**If a member of staff has concerns about a pupil or if a pupil makes a direct disclosure the following advice must be followed:**

**Listen carefully and keep an open mind.** Do not attempt to decide if abuse has taken place or not.

**Keep calm.** Keep your responses to the pupil calm and reassuring, even if they are telling you distressing or shocking information

**Never guarantee secrecy or confidentiality.** Explain to the pupil that to make sure they are safe you will need to speak to others to help you

**Never ask leading questions.** You must not ask leading questions or cross question the pupil. Let the pupil tell you what he/she wants to and do not press for more. Too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.

**Do not attempt to investigate matters further.** Your role is to listen, record and report your concerns to the DSL.

**Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury.

**Be aware** that younger pupils may disclose issues of a safeguarding nature in general conversations rather than as a specific disclosure. Children who are affected by abuse or neglect may also demonstrate their needs and distress without specific concrete evidence through their words, actions, behaviour, demeanour, written work, artwork or through other children.

There may also be concerns raised about a parent's interaction with a pupil or issues such as parental alcohol misuse, domestic violence or mental health.

**If there is any concern at all, this must be reported to the DSL and recorded. In many safeguarding cases it is not one major incident which triggers a referral but a series of seemingly more minor events. It is therefore crucial that all concerns are recorded and reported to the DSL without delay. Ultimately, all the School's systems and processes must operate with the best interests of the child at the core.**

#### **14.1 Recording safeguarding concerns (*also see Flow chart Appendix 5*)**

All concerns must be recorded on CPOMS. Any conversations directly with a pupil or overheard, or concerns arising for other reasons must have notes recorded as soon as possible which are then logged securely with the DSL. The DSL will then decide on the most suitable course of action.

Notes must be recorded neutrally, without personal commentary and should contain facts and information only, taking care to avoid personal opinion or assumptions. The record should be made as soon as possible after speaking to the pupil, so the pupil is not upset about notes being taken as they talk and before the conversation is discussed with anyone else.

The record should include the date, time and place of the conversation, who was present and what was said by the pupil. It is important to record the pupil's own words as much as possible.

The notes should be passed immediately (or as soon as feasible, and no later than the same working day) to the DSL who will then communicate the information to relevant members of staff and record the safeguarding concern for the Head's attention.

On receipt of the completed safeguarding report, the DSL will record the action taken. Depending on the circumstances of the report action taken may include one or more of the following:

- monitoring the pupil in school
- a discussion with parents
- early help intervention from the school and/or another agency
- referral to Children's Services
- referral to the LADO
- report to the police

The member of staff making the report will be informed by the DSL of the action taken. The School takes into account the child's wishes and feelings when determining what action to take and what services to provide but staff will be alert to the dangers of colluding with dangerous "secrets". There are systems in place for children to express their views and give feedback.

**If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.**

#### **14.2 Preserving evidence**

Any evidence e.g. pupil's work, notes, images on iPads, mobile phones containing messages, computer search history etc must be preserved. If evidence is found on an electronic device, the device involved should be isolated. Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means.

### **15. REFERRALS TO OTHER AGENCIES**

Referrals to services regarding concerns about a child or family typically fall into three categories:

1. Early Help Services;
2. Child in need – Section 17 (Children Act 1989) referrals
3. Child protection – Section 47 (Children Act 1989) referrals.

*The Southwark Safeguarding Board Multi Agency Threshold Guide (2019)*

[https://southwark.proceduresonline.com/pdfs/threshold\\_booklet.pdf](https://southwark.proceduresonline.com/pdfs/threshold_booklet.pdf) sets out the thresholds of need

and detailed guidance about how concerns within these different levels should be responded to.

All safeguarding referrals for pupils resident in Southwark should be made to Southwark Multi Agency Safeguarding Hub (MASH) via their Referral Form and copied to the LA's Schools Safeguarding Coordinator.

Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action.

Referrals for children who live in other boroughs should be made to the borough in which the pupil primarily resides.

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member or exacerbate the situation in any way, nothing will be said to the parent/carer prior to the referral being made. However, a rationale for the decision to progress without consent should be provided with the referral. <sup>[11]</sup><sub>[SEP]</sub>

When the School makes a referral, the local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let us, as the referrer know the outcome. The DSL will follow up if this information is not forthcoming. If, after a referral, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the Child Protection referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of, for example, parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, urgent Police intervention will be requested.** Where a child sustains a physical injury or is distressed as a result of reported chastisement or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

**If staff members, report safeguarding information to the DSL or a DDSL and believe that appropriate action has not been taken, or the safeguarding concern is not being resolved/addressed, and they do not feel able to raise concerns internally, then they are encouraged to use the School's Whistleblowing Policy or for independent advice they may call the NSPCC helpline on : 0800 028 0285 or email [help@nspcc.org](mailto:help@nspcc.org). There is also a Public Concern at Work helpline on: 0207 404 6609.**

## 16. SAFEGUARDING RECORDS

Accurate written notes are kept of all incidents and child protection or child in need concerns relating to individual pupils, including if the incident or the concern does not lead to a referral to other agencies. All contact with parents and external agencies is also recorded, using the CPOMS system.

Records are kept in a secure place and separate from the child's general or educational files. They may only be accessed by the DSL, the DDSs and the Head. Information may be shared directly with other agencies as appropriate and will be shared according to the HM Government guidance *Information Sharing (July 2018)*. The guidance states that practitioners should use their judgement when making decisions about what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

Pupils and parents do have the right to see all the information held in child protection records unless the information:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an ongoing criminal investigation; or
- also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

If an application is made to see the whole record, advice should be sought from the child's social worker, if they have one, and the Local Authority.

The content of Child Protection Conference or Review reports prepared by the School will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the School 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 ensuring secure transit and that a confirmation of receipt is obtained.

In addition to transferring the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. Parental consent is not required for child protection records to be shared with the new school. When the DSL receives child protection records from other schools, key relevant staff are made aware as required.

When pupils are withdrawn from the School other than at the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify the new address and the school to which the pupil is being admitted to ensure that all records are transferred without delay. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service either through the School's Single Point of Contact (SPOC) or the Family EHS Duty Manager in order that they might make further enquiries.

If Alleyn's receives educational records relating to a child who is not registered with the School, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. A child's name will only be removed from the School's Admissions Register in accordance with the [Pupil Registration Regulations](#) or with the authorisation of a Team Manager in the Family Early Help Service.

The School will inform the Local Authority when it adds or deletes a pupil's name from the school admission register for any reason in line with Southwark's [Children Missing Education \(CME\) Protocol](#). If a pupil arrives and the previous school is unknown, the School will search the database for any



record of the child. The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate.

The School maintains accurate and up to date records of those with Parental Responsibility and emergency contacts. It holds more than one emergency contact number for each pupil or student so it may make contact with a responsible adult if necessary. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

All contemporary records and all records of past pupils are stored safely and securely, and the School follows guidance on retaining records for future safeguarding purposes.

#### **17. STAFF RECRUITMENT PROCEDURES (*also see Alleyn's School Recruitment Policy*)**

The school follows safer recruitment procedures, paying due regard to Part 3 of KCSIE (2021) and *Disqualification under the Childcare Act (2006)*. Safer recruitment procedures are applicable to all categories of staff which includes employees, self-employed staff, staff of contractors, supply staff, governors, volunteers and visitors. The checks applied will vary according to the person's role within the School. The checks include:

- a) Verification of identity
- b) At least two references
- c) Verification of the right to work in the UK
- d) Where appropriate, verification of qualifications
- e) A medical fitness questionnaire and declaration.
- f) Verification of employment history
- g) For staff in regulated activity, a satisfactory enhanced check with the Disclosure & Barring Service (DBS)
- h) Carry out a check against the Barred List when an individual is deemed to be undertaking regulated activity
- i) A self-declaration to ensure compliance with regulations made under the Childcare Act 2006
- j) For staff engaged in teaching duties, a check that the teacher is not subject to a teaching prohibition order.
- k) Where appropriate, overseas police checks
- l) Where appropriate, a check that there are no European Economic Area (EEA) regulating authority teacher sanctions or restriction. (*From 1 January 2021, the TRA will no longer maintain a list of EEA teachers with sanctions. Teachers may be able to provide proof of their past conduct as a teacher, issued by the professional regulating authority in the country in which they worked.*)
- m) Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school
- n) Obtains written notification that appropriate recruitment checks have been undertaken by other organisations, if those personnel are not employed directly by the school, and a check that such staff presenting themselves are the ones on whom the checks have been made.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years. The School ensures that there is at least one person on every recruitment panel who has completed this training. In the Senior School, currently the Head, Senior Deputy Head and Deputy Head [Personnel and Administration] have completed the training along with the Head and Deputy Head of the Junior School and the Head of Human Resources.

All recruitment checks are recorded on the School's Single Central Record. The Single Central Record is reviewed before the start of each term at the Single Central Record Review Meeting, which is attended by relevant members of Senior Management, the Human Resources Consultant and the Link Governor.

### **17.1 Governors**

Governors will be regarded as being in regulated activity and will be subject to the following checks.

- identity
- a check of right to work in the UK
- an enhanced DBS
- Barred List check
- overseas police checks, as appropriate
- Prohibition from management check (Section 128)

### **17.2 Volunteers**

Any parent or other person/organisation engaged by the school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records Checks.

Under no circumstances will a volunteer, in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and on ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three of the DfE guidance “Keeping Children Safe in Education (Sep 2021)”.

Volunteers will be subject to the same code of conduct as paid employees of the school.

Voluntary sector groups that operate within this school or provide off-site services for our pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Partnership (SSCP). Premises lettings and loans are subject to acceptance of this requirement. Where services or activities are provided separately by another body we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

In the AJS, all members of the AJSA committee have an enhanced DBS check.

### **17.3 Contractors**

Contractors who are engaged by or on behalf of the School to undertake works on site will be made aware of this policy. The recruitment checks necessary will be determined by the Head of HR and DSL and will be appropriate to the person’s role.

Individuals and organisations that are contracted by the school to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or

supervision of children regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision depending on the circumstances. If an individual working at our school is self-employed, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

We will always check the identity of contractors and their staff on arrival at the School.

#### **17.4 Third-party groups**

This Safeguarding Policy will be brought to the attention of organisers of third-party groups using the School facilities and applies to them if there are children aged under 18 on the site. Voluntary sector groups that operate within the School, provide off-site services for our pupils, or use school facilities, will be expected either to adhere to this Safeguarding Policy or to operate a policy which is compliant with the requirements of the Southwark Safeguarding Children Partnership.

#### **17.5 Visitors**

All visitors during the school day are required on arrival to sign in at Townley Lodge or the Junior School Lodge. Visitors are issued with an appropriately coloured visitor's badge-lanyard on which is printed further instructions for the safety of both the visitor and the School community. Visitors to school buildings (not being used for sports fixtures) must remain under the supervision of a member of staff at all times and be shown back to the Lodge where the badge must be returned. Staff are encouraged to engage with any unidentified visitor and ask what her or his business is, and, if unsure, the visitor must be reported immediately to Townley Lodge or the Junior School Lodge.

#### **17.6 Visiting Speakers**

Under the Prevent Duty, the DSL and the Deputy Head in the AJS will maintain a register of all visiting speakers and will ensure they are checked as suitable before being permitted to visit the School.

### **18. ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO STAFF**

Alleyn's School takes seriously all allegations made against and concerns raised in relation to members of staff. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Head or one of the Designated Safeguarding Leads if the Head is not available and nothing should be said to the colleague involved. If there is a situation where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the local authority designated officer(s) (LADOs). In cases where the Head is the subject of the allegation or concern, they will be reported to the chair of governors, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold
2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns'

**1. Allegations that may meet the harms threshold** (see management of such allegations in section 18.1 below)

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school and will be used in respect of all cases in which it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a school's attention and appear to meet the above criteria. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO. Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London Safeguarding Children Partnership ([LSCP](#)) procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

The school has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease 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, we will consider whether to refer the case to the Secretary of State, as required by law.

## **2. Allegations/concerns that do not meet the harms threshold – known as 'low level concerns'**

School staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language.

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the threshold set out in (1.) above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – 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. However, as a good practice, the School will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'. Low-level concerns must be reported to the Head (see management of such concerns in section 18.2 below).

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance [Keeping children safe in education \(Sep 2021\)](#).

We also note the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark Council's website.

### **18.1 Management of Allegations that meet the harms threshold**

Allegations will be managed according to the following procedure:

1. Any allegation about a member of staff or volunteer must be reported without delay to the Head. In the Head's absence, an allegation against a member of staff must be reported to the Senior Deputy Head who is also the School's DSL
2. If the allegation is about the Head, the report should be made to the Chair of Governors, without notifying the Head
3. The Head or Chair of Governors will not conduct any investigations but will ask the person reporting the concern/allegation to write a detailed account of his/her concerns. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation
4. Any allegations against staff, including those considered borderline, must be discussed with the LADO without delay
5. The Head or Chair of Governors will immediately contact the LADO for Southwark within one working day of receiving the concern/allegation
6. The LADO will agree a course of action and will judge if immediate action is needed or if the concern can be dealt with through the school's usual staff disciplinary procedures
7. The Head will not undertake any enquiry or investigations. The Head will lead enquiries at a school level only if the matter is agreed with the LADO to be a disciplinary issue
8. The Head does not require parental consent before contacting the LADO
9. All documentation relating to allegations will be stored securely.

If an allegation is made against a member of staff the quick resolution of that allegation will be a clear priority and to the benefit of all concerned.

Where there are no objections from the investigating agencies, the Head will:

- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.

If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Head will take advice from the LADO and other agencies to agree

1. Who needs to know and exactly what information can/cannot be shared
2. How to manage speculation and gossip
3. What, if any, information can be given to the wider community to reduce speculation
4. If necessary, how to manage the press.

The Head, in consultation with the LADO, will decide whether or not to suspend the individual. If suspension is appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons.

### **18.2 Management of concerns that do not meet the harms threshold**

KCSIE (2021) states in paragraph 412: "It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings."

Any low-level concerns should be reported and recorded – and the management of the concerns – happens according to the following procedure:

1. The member of staff or volunteer, child or parent should contact the Head
2. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified
3. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible
4. The Head will deal with the concern and contact with the LADO is recommended for advice on how to act
5. The School will keep records of the concerns in a confidential area of the Head's office and the records must comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
6. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified
7. The School will retain such information at least until the individual leaves employment here as recommended in KCSIE (2021)
8. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO
9. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

### **18.3 Outcomes of an investigation following an allegation**

There are four possible outcomes following an investigation into an allegation against staff: substantiated, malicious, false, and unsubstantiated.

An allegation that is found to have been malicious will be removed from personnel records and any that is not substantiated, is unfounded or malicious will not be referred to in employer references. Allegations that are found to have been malicious are likely to have breached School policy and are proscribed in the Whistle-blowing Policy. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

If the allegation concerns alleged minor physical mishandling or verbal abuse, this will normally be dealt with under the School's disciplinary procedures, unless one or more of the following criteria applies:

- There is reason to suspect parental instigation or collusion
- The allegation has been reported to the Police or Children's Services by the parent or child
- The child is Looked After in Public Care
- The child is subject to a Child Protection plan or a Child in Need plan
- The child has a disability or Statement of Special Educational Need
- The member of staff concerned has been subject to previous complaints

In these cases, advice will be sought from the LADO with a view to a Strategy Meeting or Discussion being held in accordance with the Southwark SCP safeguarding procedures. This process will agree upon the appropriate course of action and the time-scale for investigations. In considering whether or not a referral to Children's Services is appropriate, the Head may seek advice from the Link Governor for Safeguarding, the Chairman of Governors, Southwark's Professional Advisor for Safeguarding in Education, the LADO and other relevant external agencies.

#### **18.4 Supply and other staff**

The School may also have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers or other staff provided by an agency. Whilst the School is not the employer it will ensure that any allegations are dealt with properly. In no circumstances will the school cease to use an individual due to safeguarding concerns, without liaising with the LADO.

### **19. REFERRAL TO THE DBS AND THE TEACHING REGULATION AGENCY (TRA)**

The school has a legal duty to refer to the DBS within one month of ceasing to use a person's services, (whether employed, contracted, a volunteer or student) anyone who has harmed, or poses a risk of harm, to a child, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had that person not left the school. (Note: ceasing to use a person's services includes: dismissal; removal; resignation; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; voluntary withdrawal from supply teaching; contract working; a course of initial teacher training, or volunteering.)

If the individual is engaged in teaching duties, a referral will also be made to the TRA. Referrals may be made to the TRA (irrespective of whether the criteria for a DBS referral have been met) for unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, any time, for a relevant offence. Advice about whether an allegation against a teacher warrants a referral to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (April 2018). Further guidance is also published on the TRA website.

### **20. USE OF CAMERAS, MOBILE PHONES AND OTHER DEVICES, INCLUDING IN THE EYFS (*also see Digital Usage Policy no. 305*) TAKING, STORING AND USING IMAGES OF CHILDREN**

#### **20.1 Use of photography or video**

Parents, carers or relatives may only take photographs or video recordings of pupils in school or on school-organised activities with the prior consent of the Head or for Junior School pupils, the Junior School Head. Parents are usually asked to restrict photography whether on cameras, mobile phones or other devices to major school events and this is indicated on the respective programmes; general filming in school by parents is never permitted. Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may cause offence or embarrassment.

Images taken by parents must be for private use only and must not be placed in the public domain. Recording and/or photographing other than for private use would require the consent of the other parents whose children may also be captured on film. Without this consent, Data Protection legislation would be breached.

Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the school without specific permission from the Head.

If parents do not wish their children to be photographed, filmed or for their photographs to be used

in any school publications or promotional materials, they must sign the School's documentation on photography to assert this.

## **20.2 Staff use of photography and video**

Photographs and video clips are often used to evidence pupil achievement and progress. When using technology members of staff must adhere to the school policy on photography and video in that:

- EYFS videos and photographs must only be taken on school devices
- Staff must not take video footage or photographs of pupils other than for school purposes
- Images must never be placed in the public domain without the express permission of the Head
- Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may cause offence or embarrassment
- Wherever possible, School devices must be used and not personal devices. School devices must only be taken off site to record evidence of out-of-school learning, for example on a school trip
- If staff take digital images of children taking part in school activities, they are required to download the images within 24 hours of taking them, or within 24 hours of return from the trip on which they were taken. Downloading should be done on the appropriate school pictures folder, managed at school
- Stored footage or photographs taken remain electronically in school
- On the rare occasions a personal device may be needed to be used, photographs or videos of pupils must not be stored. Any images must be uploaded to the school's server within 24 hours and permanently deleted from the personal device.

## **20.2 Staff use of Email, electronic communication and computers**

Staff must only use the School's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body.

When communicating with pupils, parents or carers, or for communications on any other school business, staff must only use the approved School email, or other School-approved communication-systems. Staff must not disclose their personal telephone numbers, addresses or email addresses to pupils or parents/carers. Staff should be mindful of any communications they have about school matters in public.

All computer equipment and internet access within the School will be subject to appropriate controls and internet safety rules in line with our E-safety Policy/Online Police (AJS). Pupils and staff will sign the Acceptable Use Policy, and regular mention of appropriate use of IT is made at staff training sessions. The Acceptable Use Policy signed by pupils is sent to parents for their awareness.

## **20.3 Remote learning and school closure**

In a situation where teaching and learning is supplied off-site (due to school campus closure, for instance), teachers and support staff must not communicate with pupils through any channels other than school email accounts, the virtual learning platform (the Hub) and the use of apps like Microsoft Teams. Staff will receive guidance about any 'live' education delivery, eg via Microsoft Teams.

Staff, pupils and parents will be reminded that the usual arrangements for safeguarding are not affected by School closure and that the School Safeguarding Policy applies despite pupils learning remotely.

## **21. STAFF CODE OF PRACTICE/CODE OF CONDUCT (*also see Staff Code of Conduct (Junior School) or Staff Code of Practice (Senior School)*)**

All members of academic staff in the SS and AJS are subject to a Staff Code of Conduct (AJS) or Staff Code of Practice (SS) which includes sections on pupil welfare and the importance of setting the right example to children. Both Schools have handbooks for staff.



These codes aim to ensure the welfare of pupils in the School through all staff:

- being aware of and following relevant School policies including but not limited to: Safeguarding, Health and Safety, Anti-bullying, Rewards & Sanctions, IT and E-safety, Pupils' Social and Emotional Well-being and Mental Health (Senior School), Whistleblowing and First Aid
- respecting others regardless of age, gender identity, sexual orientation, disability, race, religion, beliefs or socio-economic background
- performing their duties in a professional manner
- acting as appropriate role models in School, in their behaviour and dress
- maintaining appropriate professional relationships with pupils
- supporting the holistic development of pupils
- contributing to and supporting the pastoral work of the School
- ensuring that pupils are treated with respect and dignity
- ensuring that no punishment, detention, restraint, sanctions or rewards are used outside those detailed in the School's Rewards and Sanctions Policy
- ensuring adherence to the Use of Physical Force Policy/Restraints Policy (AJS), which underlines that there are absolutely no circumstances in which corporal punishment can be applied, nor can it be used as a threat

Advice for full-time, part-time, temporary, teaching, and support staff, volunteers and visitors about appropriate behaviour in and out of school is contained in either the Staff Handbook under 'Staff-Pupil Relations' (SS) or in the Staff Code of Conduct (AJS). This advice should be read in conjunction with this policy and is available to staff electronically on the Hub and in hard copy from the Senior Deputy Head. Failure by staff to comply with the codes for staff conduct may lead to disciplinary action, including dismissal.

#### **Abuse of trust and inappropriate relationships**

All staff must maintain appropriate professional boundaries in their dealings with pupils and understand that they are in a position of trust. It is an offence for a person in a position of trust to

- intentionally touch a child in a sexual way
- have a sexual relationship with a child, even if the relationship is consensual
- cause or incite a child to engage in sexual activity
- intentionally engage in sexual activity in the presence of a child
- for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity.
- A child for these purposes is a person under the age of 18.

However, these professional boundaries apply to **all pupils** in the School, including those over the age of 18 years. It is important to note that a relationship between a member of staff and a pupil is never a relationship of equals. Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Forming inappropriate relationships with young people who are pupils at another school will also be regarded as misconduct as it indicates that the member of staff does not understand the importance of maintaining appropriate boundaries with pupils or young people.

A document has been produced by the Safer Recruitment Consortium to advise staff on safer working practice. It is non-statutory but contains detailed advice. The document comes from a partnership between NSPCC, Lucy Faithfull Foundation, The National Association of Independent Schools & Non-Maintained Special Schools (NASS) and Child Protection in Education (CAPE): <http://www.saferrecruitmentconsortium.org/>

## 22. STAFF TRAINING AND INDUCTION OF NEW STAFF

### Designated Safeguarding Lead and Deputies

The DSL (and all deputies) undergo training at an advanced level to provide them with the knowledge and skills required to carry out their roles. This training is updated at least every two years. They also have updates on relevant issues at least annually, or as recommended by the London Safeguarding Children's Partnership.

Training includes local inter-agency working protocols and training in Southwark Safeguarding Children's Partnership's work under advice published by the London Safeguarding Children Partnership (LSCP) and their approach to *Prevent* duties. The training is provided by the Southwark SCP or an external training-provider. The Deputy Designated Safeguarding Leads (DDSLs) also have training to the same level as the DSL. The DSL advises on appropriate training for all constituencies of the School in consultation with the Southwark SCP and in line with KCSIE.

The DSL and deputies receive appropriate training in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Be aware of local procedures and thresholds of need
- Be aware of the appropriate channels for the variety of safeguarding concerns that might need referral, or advice being sought
- Have a working knowledge of how local authorities conduct a child protection assessment, case conference and child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the School's safeguarding and child protection policy and procedures, ensuring especially that new and part time members of staff are trained prior to coming into supervisory contact with children.
- Link with the local LSCP to make sure staff are aware of training opportunities
- Provide regular updates, shared by various media, to keep staff informed, between specific training sessions, about safeguarding issues.

The full training content for the DSL and deputies is set out in Annex B of KCSIE.

### 22.1 Induction training for new staff

The DSL has overall responsibility for ensuring that all new members of staff, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training takes place prior to staff starting work with children and is informed by advice from LSCP and communications from the Southwark Safeguarding schools coordinator.

### 22.2 Staff working directly with children

All new staff working directly with children are provided with induction training that includes:

- Allevyn's Safeguarding and Child Protection Policy, including the policy to deal with peer-on-peer abuse and information about the identity and role of the DSL and any deputies
- a copy of Part1 of *KCSIE* (and/or Annex A for those who do not work directly with children, depending on assessment of which guidance will be most effective for the staff to safeguard and promote the welfare of children)
- Annex B
- Staff code of conduct
- Whistleblowing Policy
- IT Acceptable Use Policies
- Pupil behaviour policy, including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- the School's safeguarding response to children who go missing from education (children missing education policy to be provided)

- On-line safety policy

All new staff who have direct contact with children are also trained at a specific session run by the DSL, the AJS Deputy Head (DDSL) or the Head of HR. They are required to read the documents listed above and sign an acknowledgment that they understand the contents. In addition, new staff are given a training session on the School's pupil conduct expectations (the Pupil Code of Conduct/Golden Rules (AJS) and they must sign an Acceptable Use Policy for use of the School's IT facilities, including specific material about their use of IT and social media.

New staff who have responsibilities for teaching in specialist areas, specifically one-to-one music tuition, sports coaching and any other tuition which takes place one-to-one, are reminded of the particular need for care in discharging their duties according to the School's safeguarding procedures and Staff Code of Conduct.

### **22.3 Support staff**

Support staff receive initial safeguarding training from the Head of Human Resources. They are required to read the School's Safeguarding Policy, Part One of KCSIE (or Annex A, depending on assessment as which best promotes the safeguarding and welfare of children) and the Staff Code of Conduct. They must sign to confirm they understand the contents.

### **22.4 Staff refresher training**

The whole staff (academic, support and volunteers) meets for training each year for updates organised by the DSL. Other updates are delivered during the year at staff training sessions, as required. All staff are trained in how to listen, respond to and report any disclosures including those which involve peer on peer/child on child sexual violence or harassment.

Individual staff training on safeguarding issues is available through the CPD budget and staff can approach the Deputy Head [Personnel and Administration] and the Head of the AJS regarding such training needs.

### **22.5 Governors**

All members of the Board of Governors receive safeguarding which is updated at least annually. The Link Governor with responsibility for safeguarding receives additional training. The Governors also have regular in-house training and the Chair and Link Governor receive discrete training from approved bodies.

### **22.6 Co-curricular staff, volunteers and temporary staff**

The School takes a risk-based approach to the level of information that is provided to temporary staff and volunteers.

Co-curricular staff and volunteers (*eg* the AJSA Committee members, adults helping with co-curricular activities) with unsupervised access to pupils, and temporary staff receive initial induction on safeguarding issues from the DSL in the Senior School and the DDSL in the Junior School, before they have contact with pupils.

Temporary and voluntary staff who work with children will be made aware of Safeguarding arrangements by either the DSL, the Head of Human Resources or the DDSL (AJS Head).

### **22.7 Training Records**

The Head of Human Resources keeps a log of all staff training in safeguarding and child protection, and this is reviewed each term with the Link Governor and at a meeting about the Single Central Register with the Head, Head of the Junior School and DSL, at the start of each term.

## **23. THE ROLE OF THE BOARD OF GOVERNORS**

The Board of Governors takes its responsibilities regarding children's welfare seriously. It will ensure that the School:

- nominates a member of the Governing Body as a Link Governor for safeguarding follows the

statutory guidance in *Keeping Children Safe in Education* (Sep 2021)

- engages in inter-agency working in line with *Working Together to Safeguard Children* (July 2018)  
which takes into account the procedures and practice of Southwark SCP
- has an effective and compliant Safeguarding Policy, which is reviewed annually as a minimum.
- carries out annual review of safeguarding
- has a range of other policies in place to ensure the safety of pupils and promote their welfare
- appoints a DSL (and a number of deputies) who has the appropriate status and authority, as well as the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.
- all staff receive appropriate induction and ongoing safeguarding training in accordance with KCSIE and local requirements
- has an effective staff code of conduct
- operates safer recruitment procedures and that a compliant Single Central Register is maintained
- has a clear policy on the use of mobile technology in the school
- has a curriculum in which pupils are taught about safeguarding, including online safety

### **23.1 Link Governor**

The Board of Governors has nominated Professor Frances Bowen as the Link Governor for Safeguarding. She takes the lead on safeguarding on behalf of the Governing Board and will liaise with the local authority and/or partner agencies on issues of child protection.

The Link Governor maintains a close relationship with the DSL and they meet on a termly basis (often multiple times each term) often with other relevant staff. They review and monitor the volume and progress of cases where a concern has been raised to ensure that the School is meeting its duties and the Safeguarding Policy is being implemented effectively. This is in addition to, and does not replace, the responsibility that rests with the Head to monitor the work of the DSL.

The Link Governor also has a termly meeting with the Head of Human Resources, the Head of the Junior School and the DSL in order to inspect the Single Central Register and review current practice.

### **23.2 Annual Review**

The Head provides an annual report to the Board of Governors (supplied by the DSL) outlining details of any safeguarding issues that have arisen during the year and the outcome of any cases identified. (These reports respect confidentiality and do not identify any person(s) by name.) This report also provides an audit of trends and data from the year's safeguarding issues.

This policy is available to all parents and potential parents via the website and appropriate pages on The Hub. Staff and pupil feedback about safeguarding issues will be incorporated where appropriate.

All complaints arising from the operation of this policy will be considered under the School's complaints procedure, with reference to external agencies if necessary.

**The Board of Governors has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the link governor or the Head.**

..... Date.....  
Iain Barbour, Chair of Governors

..... Date .....  
Frances Bowen, Link Governor for Safeguarding

..... Date.....  
Jane Lunnnon, Head

..... Date .....  
Andy Skinnard, Designated Safeguarding Lead

## Appendix 1

### Addendum to Safeguarding and Child Protection Policy for any period of remote learning

This addendum to Alleyn's Safeguarding and Child Protection Policy contains details of our safeguarding arrangements during times of remote provision and support (e.g. COVID-19 outbreak).

This addendum draws upon the DfE guidance "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (27 March 2020)"; the Model Covid-19 Safeguarding Policy Addendum (Southwark Children's & Adult's Services April 2020) and "Identification of, and planning for, vulnerable pupils during school closure" circulated by Southwark Local Authority in March 2020.

*We remind all staff, pupils and parents that we continue to have appropriate regard for the current guidance on Keeping Children Safe in Education (KCSIE, Sep 2021) despite arrangements for remote provision. The School's Policy on Safeguarding and Child Protection continues to apply.*

Specific arrangements during periods of Remote Provision are outlined below under the follow sub-headings:

1. Availability of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and reporting and recording safeguarding concerns
2. Vulnerable Children
3. Attendance
4. Anti-Bullying and Harmful Peer Relations
5. Supporting Children
6. Safer recruitment and concerns about staff
7. Staff training and safeguarding induction
8. Children transferring schools
9. Data Protection and GDPR
10. Support from the Local Authority (Southwark)
11. Online Safety
12. References to other school policies

#### **1. Availability of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and reporting and recording safeguarding concerns**

*Any safeguarding incidents or potential concerns should be reported to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead at the earliest opportunity.*

*It is of paramount importance that all staff act immediately on any safeguarding concerns by contacting the DSL or a DDSL.*

The DSL and DDSLs may be contacted by email or, if urgent contact is required, by phone using the contact numbers below. (NB: these should not be shared with pupils and parents.)

<b>Safeguarding role</b>	<b>Name</b>	<b>Title</b>	<b>Contact</b>
Designated Safeguarding Lead (DSL) and Designated Child Protection Officer (DCPO) – and Prevent lead whole School	<b>Andy Skinnard</b>	Senior Deputy Head Member of SMT	safeguarding@alleyns.org.uk
Deputy Designated Safeguarding Lead (DDSL) – Senior School	<b>Rob Atkinson</b>	Assistant Head, Head of Upper School Member of SMT	safeguarding@alleyns.org.uk
DDSL – Senior School	<b>Mel Joel</b>	Assistant Head, Head of Middle School Member of SMT	safeguarding@alleyns.org.uk
DDSL – Senior School & Alleyn's Junior School Link	<b>Liz Thornton</b>	Assistant Head, Head of Lower School Member of SMT	safeguarding@alleyns.org.uk
DDSL – Alleyn's Junior School and Responsibility for EYFS	<b>Simon Severino</b>	Head, Alleyn's Junior School Member of SMT	jssafeguarding@alleyns.org.uk
DDSL – Alleyn's Junior School	<b>Erica Olley</b>	Deputy Head, Alleyn's Junior School, Member of SMT	jssafeguarding@alleyns.org.uk
DDSL – whole School Support Staff	<b>David Wicksteed</b>	Human Resources Consultant	hr@alleyns.org.uk
Link Governor for Safeguarding – whole School and EYFS	<b>Prof Frances Bowen</b>	Governor	safeguardinglink@alleyns.org.uk

At times when a trained DSL or DDSL is not physically available on site, a teacher will be instructed to contact the DSL or DDSL using their staff mobile phone numbers.

Safeguarding concerns in the Senior School should be logged by staff on CPOMS once they have been raised with a DSL or a DDSL. They should be marked with the safeguarding category so that the appropriate DSL and DDSL are automatically alerted. Instructions on using CPOMS can be found on the Hub. Junior School staff should raise and log concerns with the Head or Deputy Head of the Junior School.

The Head will be updated about current safeguarding concerns periodically by the DSL or a DDSL via a secure video or audio conversation.

## **2. Vulnerable Children**

"Vulnerable children" include children with social worker involvement, such as Looked After Children (LAC), Children Subject to Child Protection Plan (CPP), Children in Need (CIN), privately fostered children, etc. Closely liaising/working together with allocated social workers is even more important. Further information on vulnerable children can be found in the Government's [guidance on vulnerable children and young people](#). There may be other groups of children who will be vulnerable for various reasons, such as children with education health and care (EHC) plans, young carers and children for whom home life is known to be particularly challenging or high risk, *e.g.* domestic abuse, substance misuse, parental mental ill health, high levels of neglect and pupils who are under assessment with Children's Social Care, or those for whom referrals have recently been submitted which did not lead to further action.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

We will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children where applicable. The lead person for this in school will be the DSL.

Each vulnerable child is allocated to a member of the DSL team under the overall supervision of the DSL. Normally this will be the DDSL overseeing the section of the School of which the pupil is a member. In the absence of the allocated member of the DSL team, responsibility for contacting vulnerable pupils may be re-allocated to another DSL, another member of SMT, or delegated to the tutor or Housemaster (with guidance from the DSL or a DDSL). The DDSL will make contact with each allocated child on a regular basis to check their safety and wellbeing and a summary of the conversation will be recorded on CPOMS. Any unsuccessful contacts, as well as those that did take place, will also be recorded. Any urgent safeguarding concerns will be escalated immediately through consultation with the Southwark Multi Agency Safeguarding Hub (MASH), or equivalent in another LA, and/or the Police.

There is currently an expectation that vulnerable children who have a social worker will attend school, as long as it is safe for them to do so (i.e. they don't have underlying health conditions that put them at risk). In circumstances where a parent does not want to bring their child to school, and their child is considered vulnerable, the social worker and school should explore the reasons for this directly with the parent and help to resolve any concerns or difficulties wherever possible. At all times, the School will follow the advice set out by Public Health England.

### **3. Attendance**

Local authorities and schools do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

At Alleyn's, pupils working remotely will be asked to virtually "check-in" each morning via a web form and the list of non-responders will be published to tutors. Tutors will engage with their tutor groups via posts and/or live catch ups and will follow up by emailing individual pupils and, if necessary, parents if they do not hear from individual pupils. In the Junior School pupils will register remotely each day and the list of non-responders published to tutors, who will follow up with parents (under the guidance of the current Head of Infants) over unexplained absences.

Schools and social workers will agree with families whether children in need should be attending education provision – and we will then follow up on any child that we were expecting to attend, who does not. Schools should also follow up with any parent or carer who has arranged care for their children and the children subsequently do not attend. In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the School should notify their social worker.

The DfE's daily online attendance form should be completed by the Chief Administrative Officer (or person delegated by her) to keep a record of children of key workers and vulnerable children who are attending school.

Any changes to parents' emergency contact information MUST be communicated immediately to the School by email to the relevant Section Administrator.

### **4. Anti-Bullying and Harmful Peer Relations**

The principles outlined in the School's Anti-Bullying and Harmful Peer Relations (Peer on Peer/child on child Abuse) Policy (including the Junior School version) and those set out in part 5 of KCSIE (21) continue to apply.

Pupils have received PSHE lessons on cyber-bullying and staying safe online. Pupils have been sent an addendum to the IT acceptable use policy that applies specifically to remote learning and will be sent further updates when required. Parents will be sent guidance on staying safe online.



Pupils are advised that they should be mindful of appropriate peer relations in all of their communications, whether using school systems or not. When using school systems, staff are advised that settings should be adjusted such that pupils cannot delete or edit comments that they have made (in Microsoft Teams). In the Junior School staff are asked to be mindful of comments posted on class chat pages. All pupils will be reminded of these important protocols regularly, e.g. at the start of term.

Pupils should contact their tutor, Housemaster, Section Head or a trusted member of staff to discuss concerns regarding cyber bullying or harmful peer relations. It is best practice for two members of trusted staff to contact together individual pupils to hear their concerns, using Microsoft Teams, or through a parent in the Junior School. Parents should be made aware as soon as is reasonably practical.

Where peer-on-peer relations become a concern between two or more pupils, then a risk assessment should be carried out to consider likely online contact through school systems (eg pupils sharing class groups) and adjustments made to protect all parties.

Consideration should still be given, as per the School's policy, as to whether contact needs to be made with outside organisations such as Children's Social Care or the Police. All School sanctions could be applied if this advice dictates that the matter can be dealt with by the School.

Two members of staff provide a safe space for the reporting of concerns about any treatment due to racial differences or behaviours linked to any person from a racial minority. Concerns can be raised in person or by use of an email address set up for a referral. These concerns are discussed with the pupil/s to guide on a way to address what could range from a microaggression to an abuse based on race, to concerns with social issues and more. The members of staff register the concerns on CPOMS, speak to relevant staff, as applicable, and guide pupils on next steps. The ability to speak to these members of staff is brought to pupils' attention via Sectional assemblies.

## **5. Supporting children**

Staff should be familiar with the types of abuse and specific safeguarding matters as outlined in Appendix 4 of the School's Safeguarding and Child Protection Policy, including grooming and radicalisation (both of which could happen online), cyberbullying, and peer-on-peer abuse. Staff should be alert to changes in children's behaviour and refer potential concerns to the DSL or a DDSL. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

### **(a) Supporting children not in school**

Remote learning will present new challenges for pupils and their families and may exacerbate existing concerns surrounding anxiety, family relations or feelings of low mood.

Tutors should aim to check in with their tutor groups daily and, in conjunction with Housemasters, arrange joint contact with individual pupils to check on their well-being at regular intervals as they would have done when the School is in normal operation. Parents should be contacted to discuss concerns when required. Concerns should be escalated to the relevant Head of Section using CPOMS alerts or email contact. A communication plan will be established by the relevant Head of Section and staff will record contact via CPOMS. Contact may include email, contact via Microsoft Teams where two members of staff are present in live video or audio conversations, or phone or doorstep contact with prior agreement of the DSL or a DDSL.

In particular, any disclosure by the pupils of low mood, self-harm or suicidal thoughts that are not already being addressed should be raised as an immediate safeguarding concern with the DSL or a DDSL and parents contacted to ask them to keep an eye on their child, with further referral to outside agencies if required. The DSLs will liaise with the School Counsellor and Chaplain as required.

### **(b) Supporting children in school**

Alleyn's School is committed to ensuring the safety and wellbeing of all its pupils. We will continue to be a safe space for all children to attend and flourish. This section applies in particular to those children of key workers and vulnerable children who are educated on site.

We will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. We will refer to the Government guidance for education and childcare settings on [how to implement social distancing](#) and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. We will ensure that, where we care for children of critical workers and vulnerable children on site, the appropriate support is in place for them.

## **6. Safer recruitment and concerns about staff**

If staff and volunteers have concerns about a staff member or volunteer who may pose a safeguarding risk to children, the guidance given in Keeping Children Safe in Education and in the School's Safeguarding and Child Protection Policy continue to apply.

Complaints or allegations made against staff/volunteers must be brought immediately to the attention of the Head (via [head@alleyns.org.uk](mailto:head@alleyns.org.uk)) in order that he may activate the appropriate procedures through the office of the LADO. If the complaint is about the Head, or in the Head's absence, the person to contact is the Chair of Governors. The Chair of Governors, Mr I Barbour, can be contacted c/o the Clerk to the Governors, Mrs M McGregor, at Alleyn's School, Townley Road, Dulwich, London SE22 8SU or via [Clerk@alleyns.org.uk](mailto:Clerk@alleyns.org.uk)

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, we will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of [Keeping children safe in education \(KCSIE\)](#), including any revised arrangements for ID checking that the Disclosure and Barring Service has advised to minimise the need for face-to-face contact. Under no circumstances should a volunteer who has not been checked (as set out in paragraphs 167 to 172 of KCSIE) be left unsupervised or allowed to work in regulated activity.

We will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult, as per paragraph 163 of KCSIE.

We will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's '[Teacher misconduct advice for making a referral](#)'. During the COVID-19 period all referrals will be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk).

It is essential that the School is aware who, on any given day, will be in School and that the appropriate checks have been carried out. The Single Central Register must continue to be maintained as normal.

## **7. Staff training and safeguarding induction**

Where a DSL or DDSL cannot attend refresher training due to government measures, they will continue to be classed as a trained DSL and DDSL as per the DfE's guidance and will undertake to update their training as soon as is practical thereafter.

Where new staff are recruited, or new volunteers enter the school or college, they should continue to be provided with a safeguarding induction. All should read part 1 of KCSIE as well as the School's Safeguarding and Child Protection Policy, including this addendum.

In any cases where staff from other schools are temporarily providing support to Alleyn's, the DSL should judge on a case-by-case basis, the level of safeguarding induction required. In most cases, they will already have received appropriate safeguarding training and all they will require is a copy of the relevant School policies and confirmation of our DSL arrangements. We will seek confirmation from their current employer that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

## **8. Children transferring schools**

Where there are pupils transferring between schools during this period (for example where schools provide education to vulnerable children and children of key workers from other schools) the

principles set out in KCSIE for the transfer of the child protection file to the new school must be followed. As a minimum, receiving schools must have access to a vulnerable child's Education Health and Care plan and details of their social worker.

Whilst schools and colleges must continue to have appropriate regard to data protection and GDPR they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 82-88 of KCSIE (Sep 2021).

## **9. Data Protection and GDPR**

Guidance should be sought from the Data Protection Officer (the Bursar) **before** any pupil information is passed to external online providers that the School does not already use. Staff should ensure that any software used is suitable for the age groups concerned and that privacy issues have been resolved in advance, and that use is in line with the software provider's terms and conditions.

Pupils will be advised that live sessions will, for the time being and until otherwise notified, be recorded by the teacher and posted in the relevant Microsoft Team for safeguarding reasons and for the benefit of pupils who are not able to attend the session. In the event that pupils or parents object to such recordings, these concerns should be directed to the Bursar; however, the School's view is that this is a necessary, proportionate and lawful step to fulfilling its duty of care to pupils and not something that requires consent or can be opted out of without exceptional reasons (although pupils should be given the chance to opt out of video recording, and this should be respected).

These videos will be deleted from Microsoft Stream after a reasonable period (which may depend on the purposes for which the video is being used), and in any event at the end of the academic year, except where there is some specific lawful purpose to retain longer.

## **10. Support from the Local Authority (Southwark)**

- The LADO: Eva Simcock 020 7525 0689
- Duty telephone number for enquiries/referrals when LADO is unavailable: 020 7525 3297
- The LA's Strategic Lead Officer for safeguarding in education services: Director of Education Nina Dohel 020 7525 3252
- The LA's Schools Safeguarding Coordinator: Apo ÇAĞIRICI 020 7525 2715
- Southwark MASH Duty: 020 7525 1921
- Southwark Family Early Help Service Duty: 0207 525 1922

We also note the list of suggestions from Southwark about the arrangements for identification of, and planning for, vulnerable pupils during school closure, circulated in March 2020.

## **11. Online Safety**

The principles outlined in the School's IT and E-safety policy continue to apply. The IT support team will continue to ensure that appropriate filters and monitoring systems are in place to protect the School's IT systems.

Messages around online safety will continue to be a feature of our remote pastoral care via tutors and assemblies. We have recommended to parents that they take reasonable steps to check that their child is staying safe online. We have advised parents to check the privacy and security settings of home networks carefully. We have asked that pupils report safeguarding incidents that occur online (such as harmful online content or cyberbullying) to us as soon as possible so that we may follow them up, and pupils may report harmful online content via the UK Safer Internet Centre at <https://reportharmfulcontent.com>

In all dealings online, we have advised parents that they and their children consider carefully the importance of engaging only reputable organisations and individuals who can provide evidence that they are safe and can be trusted to have access to children.

Online teaching will follow the same principles as set out in the relevant staff code of practice/conduct and we have published specific guidance on remote learning protocols and online safety for staff, including practices for live remote audio or video contact with individual pupils and live-streaming of audio and visual content (see separate appendix).

## **12. References to other school policies**

This addendum serves to provide specific guidance that is particularly relevant in times of remote provision. It should be read in conjunction with the following School policies which continue to apply, and staff should continue to be mindful of and familiarise themselves with these:

- IT and E-safety Policy;
- Acceptable Use Policy for Pupils using School IT facilities;
- Acceptable Use Policy for Staff using School IT facilities;
- Acceptable Use Policy for Staff using School Tablet devices;
- Taking Storing and Using Images of Children;
- Teaching Staff Code of Practice;
- Junior School Staff Code of Conduct;
- Privacy notice (parents);
- Privacy notice (pupils);
- Privacy notice (staff);
- Anti-Bullying and Harmful Peer Relations (Peer on Peer/child on child Abuse).

## Appendix 2

### Protocols in place for the safe education of children remotely (from 19-20 Remote Education Policy)

#### Remote Learning Protocols and Online Safety: Staff

- Teachers and support staff should continue only to use school-approved methods to communicate with pupils.
- All communications should aim to be completed during the normal working hours of 8.30am-3.45pm (or up to 5.15pm for co-curricular activities).
- Staff should not use their private email addresses, WhatsApp groups or any other form of social media that is not directly regulated by the School to communicate with pupils.
- Staff should make their Head of Department or Section Head a joint owner of a class Team when using Microsoft Teams. Staff should be aware that line managers may conduct virtual learning walks to help ensure both quality of provision and that safeguarding protocols are being followed.
- When signing up to online resources (*e.g.* Seneca Learning) staff should use their school email addresses for the purposes of schoolwork.
- Colleagues should use, where possible, Planet E-stream to upload pre-recorded video clips that they have made. When uploading videos via Youtube, teachers should ensure that the videos are shared from a teacher account specifically set up for the sharing of videos for school use. Videos should not be shared publicly and should only be accessible via a specific link. This link should not be shared with pupils via a public domain (*ie* it should be shared privately via email, Hub task or a Teams channel post). Comments should be turned off so that pupils cannot comment on the video.
- In any recorded video, staff should ensure that no personal identifying information can be seen in the background. Dress should be appropriate, and the background should be appropriate and not contain any personal information.
- Staff should take great care to avoid sharing any inappropriate images or language with students. Live lessons should be started with the camera switched off and all applications should be closed down apart from the specific content required to be shared with students (eg a PowerPoint presentation or whiteboard) before a live lesson or recording takes place to avoid the possibility of content being inadvertently shared with pupils if the screen is shared.
- In all video footage recorded by teachers, people who are not connected to the school should not appear.
- Staff should take reasonable steps to limit the sharing of large data files via the School's server. However, they should not use personal email systems to store or send school data and in particular personal data of staff, parents or pupils. Particularly when working remotely, consideration should be given to using password protection for sending sensitive files.
- Staff should check the suitability of any online source that they recommend (e.g. have you watched full videos, or just the start?).
- Staff should check that they fully understand how to use any system for online lessons before using it with pupils and seek advice from IT support, their Head of Department or another suitable colleague (eg AJM, CLH) where necessary.
- Staff should log any safeguarding incidents that occur during online learning and report these to the DSL or a DDSL.

### Practices for live remote audio or video contact with individual pupils

- Teachers should avoid live 1:1 audio or video contact with individual pupils both to safeguard pupils and to safeguard themselves, except for specific purposes with protocols required. See section below about one-to-one provision.
- When contacting pupils via email, staff should use their school email address only and should copy in other pastoral staff (eg tutor, Housemaster) when necessary.
- Written chat messages in Teams should be of an appropriately formal tone, and should only be used for routine conversations involving questions on schoolwork and anything of concern should be raised with the Head of Department, or appropriate pastoral staff as appropriate. The Teams posts should not be deleted so that a record of conversations with pupils is maintained.
- The time, date and a record of meetings with individual pupils should be recorded on CPOMS immediately following the meeting, alerting relevant pastoral staff (Housemaster and/or Head of Section).
- Live contact with individual pupils should not be taking place in the Junior School without the approval of the Junior School Head.

### Practices for live-streaming of audio and visual content

- Staff should use school provided equipment wherever possible for live-streaming sessions and, where this is not possible, when using personal devices suitable privacy settings and measures should be in place, including:
  - Devices must be locked when not in use to and ensure devices are password protected to prevent unauthorised people from gaining access.
  - No documents should be stored on devices that could be classed as private or sensitive.
  - Use OneDrive to maintain the security of documents
- Staff may only use Microsoft Teams to conduct live-streaming sessions. Any deviation to these arrangements must be agreed in writing by a Deputy Head (Senior School) or the Head of the Junior School in advance.
- Staff **should record live sessions and store them in the relevant class area of Teams** both for safeguarding reasons and to share with pupils who cannot access the session at the time. It is imperative to make sure that all participants are aware of the following:
  - The purpose of any recording is explained to all participants, before beginning any recording;
  - Any participant who wishes to do so is given the opportunity to switch off their video camera (and participate by audio or text only) if they wish;
  - Great care is taken not to risk sharing anyone's personal information except as strictly necessary for delivery of the lessons;
  - Any recordings are not shared beyond those who need them for their educational purpose;
  - Any recordings must stay on Alleyn's School platforms and must be deleted after their intended use (no later than the end of the academic year).
- At the start and throughout sessions, teachers should be clear about the expectations of student behaviour (e.g. a 'classroom standard' of behaviour is expected from all participants and they should usually mute their microphones unless they want to ask a question). Be clear that neither the recording by pupils nor the onward sharing of events is acceptable.

- Staff should make a note of the live session timing and who participated, including those that arrived/departed early or late. Concerns over absent pupils should be passed to the tutor to follow up. Live sessions should only take place at the times specified in the remote learning timetable.
- Staff should take care that they do not turn on video streaming for students by mistake.

**Specific Procedures for Visiting Music and LAMDA Teachers:** It is imperative that safeguarding best practice and principles are adhered to in these settings. VMTs and LAMDA teachers may use live video streaming facilities for individual lessons only if the guidelines for these contexts, that will be communicated separately (VMT Guidelines - Appendix 6), are followed.

### **Guidelines and procedure for one-to-one live audio/video contact (sessions) with pupils**

#### **Rationale**

- To enable pupils to have aspects of their education supported through one-to-one live sessions with teachers, and members of support staff other than using Teams Chat;
- To enable individual help and support to be delivered in the most effective way possible;
- To ensure that any one-to-one sessions with pupils happens in an appropriately safe and regulated manner, for the protection both of pupils and members of staff.

#### **Remote Sessions or contact**

- If any live one-to-one sessions occur, they must first be agreed by the Head of Department or line manager and the DSL (there is a form for that purpose);
- The sessions must fulfil certain criteria for consideration of the Head of Department and line manager before the form is sent to the DSL for agreement;
- The timing of the sessions must be communicated to parents in advance;
- The platform for the sessions must be Microsoft Teams and the sessions must be recorded;
- Any concerns from the teacher or member of support staff arising in a session must be reported immediately afterwards to the Head of Department/line manager.

#### **Safeguarding Considerations:**

- **Safeguarding is as critically important remotely as it is when teaching on-site at school, and any communication must adhere to the School's Safeguarding and Child Protection Policy, including the addendum covering remote provision;**
- All the usual safeguarding considerations with regard to remote provision of lessons or meetings apply, including procedures in cases of pupil disclosure;
- All members of staff conducting live one-to-one sessions have been subject to the appropriate employment checks and safeguarding training and updates (including since the recent re-introduction of remote provision). Those who have not will be asked to confirm awareness of the safeguarding update training stored in the Staff area of the Hub;
- Hosting one-to-one sessions presents many of the usual safeguarding issues, but there are some that are unique to or heightened through this method of communication, given the inherent privacy of the context. The following notes must therefore be observed in this context:
  - Make sure parents have agreed to the one-to-one sessions in advance (either the member of staff hosting the session or the Head of Department or line manager can do this);
  - Only use Microsoft Teams. Such sessions should not be conducted over WhatsApp or other unregulated platforms, or via a mobile phone;
  - The sessions must be recorded;
  - Personal contact data (phone numbers, private emails *etc.*) should never be shared between members of staff and the pupils;

- The sessions should always take place in a suitable environment (*i.e.* an office or study, not a bedroom or other private space);
- Members of staff should ensure that no personal identifying information can be seen in the background;
- Appropriate dress should be worn by the pupil and teacher according to the expectations set out for the School's remote provision;
- Should anything of concern or deemed inappropriate occur, the member of staff should end the session (without necessarily drawing attention to anything in particular), take a written note and report to the DSL/DDSL as soon as possible.

### **Recording the sessions**

1. The School has informed parents and pupils of the data implications of recording one-to-one sessions, with the recording lasting on the Teams account for 20 days before automatic deletion.
2. The Teams platform stores the recording automatically for 20 days prior to deletion; **it is critical that if something concerns the member of staff then that recording should be viewed by the DSL/DDSL (and possibly other members of SMT) prior to the expiry of the recording.**

### **Procedure for one-to-one live audio/video sessions between staff and pupils**

After risk assessment, it is permissible – in certain circumstances and for certain reasons – for teachers to engage in live audio or video communication with individual pupils (what we shall call 'one-to-one' provision).

Circumstances and reasons for one-to-one provision:

- There is an agreed (with Head of Department/line manager) need for such one-to-one engagement;
- The reason for the one-to-one provision is that it facilitates better the addressing of a particular educational need for the pupil, which cannot be addressed either through 'Teams Chat' or through a live group lesson;
- There is consideration of the age and personal circumstances of the pupil;
- There is agreement between the HoD/line manager and the DSL/DDSL that the stated reason justifies the provision.

### **Safeguarding considerations:**

- The parents of the pupil will receive notification by email that such a one-to-one session is going to take place (either as a regular part of the timetable – with dates published in the email) or as a one-off session. The email will be sent by the HoD/line manager naming the teacher involved;
- The sessions will be recorded;
- The member of staff will be aware that the recording could be asked to be viewed in future by a parent or colleague (for up to 20 days);
- The member of staff will pay particular heed to the environment in which s/he hosts the session;
- The member of staff will pay due regard to normal safeguarding practices should a concern arise (including what to do in cases of disclosure by a pupil);
- The member of staff will communicate immediately with the DSL (in his absence, a DDSL) if any concerns arise, both in terms of concerns about a pupil, or if anything occurs that gives concern about the member of staff's position. Access to the recording will usually be required at that point.



**Procedure:**

- The HoD/line manager signs a proforma to return to the DSL office, articulating the reason for the one-to-one provision, with dates;
- The Member of staff signs that s/he is aware of the safeguarding duties that apply and the need for recording and reporting any matters of concern;
- Parents are informed by the HoD/line manager in advance, detailing when the sessions will occur and which teacher will host the session;
- The DSL signs agreement and the DSL office retains proforma.

**Guidance for Senior School parents**

Dear Parent,

There are a number of a key platforms that will form our remote learning practices in the coming weeks. Your child will be familiar with the Hub, but less familiar, perhaps, with Microsoft Teams which will be used to deliver the 'live' (video or audio) content by tutors and teachers. We anticipate that your child will take part in at least 3 live sessions a day, including one with their tutor at the start of the school day at 8.30.

We require all pupils to adhere to the School's ICT acceptable use policy, which they agreed to at the start of the academic year. In addition, we will be issuing a further acceptable use policy (attached) that covers some specific elements relating to remote learning and online safety guidance for pupils. Please read and discuss these documents with your child. If you have any concerns or queries regarding the agreement, please contact the relevant Head of Section and we will deal with your enquiry accordingly.

In order to facilitate our programme of remote provision and support we ask that you support your child, where possible, by:

- providing them with a workspace that is quiet, safe and free from distractions with an adult nearby if necessary;
- making sure your child is dressed appropriately for lessons;
- ensuring that all communications your child engages in are appropriate in their tone and content.

Parents should be aware that pupils may well find periods of remote provision where they are not in contact with the school community particularly difficult. We encourage them in the first instance to email their tutor or Housemaster to discuss their concerns and to engage with their tutor groups via their tutor group Teams.

Messages around online safety will continue to be a feature of our remote pastoral care via tutors and assemblies. However, we recommend that you take reasonable steps to check that your child is staying safe online. This will involve checking the privacy and security settings of your home networks carefully. We have asked that pupils report challenging pastoral and safeguarding incidents that occur online to us as soon as possible so that we may follow them up, and pupils may report harmful online content via the UK Safer Internet Centre at <https://reportharmfulcontent.com>.

We have received the following recommendations from the DfE where parents can find advice on keeping their children safe online:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online

- [UK Safer Internet Centre](#) - advice for parents and carers

In all dealings online, we advise that you and your child consider carefully the importance of engaging only reputable organisations and individuals who can provide evidence that they are safe and can be trusted to have access to children.

As a general precaution, devices should be locked when not in use to and pupils should ensure devices are password protected to prevent unauthorised people from gaining access. It is best to use OneDrive to maintain the security and safety of documents.

### **Guidance for Junior School Parents**

Dear Parent,

There are a number of a key platforms that will form our remote learning practices in the coming weeks. Your child will be familiar with the Hub, but less familiar, perhaps, with Microsoft Teams, which will be used to deliver the 'live' content by tutors and teachers. We anticipate that your child will take part in a live session with their tutor once a day usually. We ask that you are present in the room at all times when your child is participating in live sessions to help ensure their safety online.

We require all pupils to adhere to the School's ICT acceptable use policy, which they agreed to at the start of the academic year. We recently sent home additions to that policy that cover some specific elements relating to remote learning and online safety guidance for Pupils (attached). Please read and discuss these additions with your child. We will continue to make messages around staying safe online as a key feature of the daily remote assemblies. If you have any concerns or queries regarding the agreement, please contact our Computing Coordinator, Mrs Charlotte Hatton.

In order to facilitate our programme of remote provision and support we ask that you support your child, where possible, by:

- providing them with a workspace that is quiet, safe and free from distractions with an adult nearby if necessary
- making sure your child is dressed appropriately for lessons
- ensuring that face-to-face communication between pupils is appropriate

Parents should be aware that pupils may well find periods of remote provision where they are not in contact with the school community particularly difficult. We encourage you to share such concerns on their behalf with your child's tutor.

Messages around online safety will continue to be a feature of our remote pastoral care via tutors and assemblies. However, we recommend that you take reasonable steps check that your child is staying safe online. This will involve checking the privacy and security settings of your home networks carefully. We have asked that pupils report challenging pastoral and safeguarding incidents that occur online to us as soon as possible so that we may follow them up, and pupils may report harmful online content via the UK Safer Internet Centre at <https://reportharmfulcontent.com>.

We have received the following recommendations from the DfE where parents can find advice on keeping their children safe online:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

In all dealings online, we advise that you and your child consider carefully the importance of engaging only reputable organisations and individuals who can provide evidence that they are safe and can be trusted to have access to children.

As a general precaution, devices should be locked when not in use to and pupils should ensure devices are password protected to prevent unauthorised people from gaining access. It is best to use OneDrive to maintain the security and safety of documents.

### **Remote Learning Protocols and Online Safety: Pupils**

#### **Additions to the Acceptable Use Policy for remote learning during school closure - Senior School**

1. I understand that any communication that I make will adhere to the usual expectations of behaviour and in line with the ICT Acceptable Use Policy signed in September 2019.
2. I understand that any infringements will be dealt with by Staff in line with normal sanction procedures.
3. I understand that when taking part in live-streaming sessions, I should be in an appropriate location (where the background does not contain any personal information or inappropriate posters etc) and appropriately dressed.
4. I am aware that all live-streaming sessions that occur in Microsoft Teams will be recorded and stored on in the appropriate Class Team for safeguarding reasons or to be viewed later by those who cannot attend a session.
5. I understand that the recording by me, or the onward sharing, of material (e.g from the Hub) is not acceptable.
6. I understand that it is best practice for me to join live-streaming sessions with my camera turned off and my microphones muted. I should wait for further instructions from the teacher on how the session will run.
7. I understand that I should minimise the transfer of large items of data via the School's email server.
8. I understand that I should do what I can to limit contact with staff outside the normal working hours of 8.30am-3.45pm (5.15pm for co-curricular activities).
9. I understand that Microsoft Teams is for school use only and that my usage of it can be monitored.
10. I understand that I should avoid sharing any offensive, illegal or inappropriate images or language with other pupils.
11. I understand that the normal school policy on bullying, cyberbullying, peer on peer/child on child abuse and other unkind behaviours continue to apply during periods of remote provision and I will ensure that ALL contact with other pupils is appropriate, however this contact is made.
12. I will report safeguarding incidents that occur online (such as harmful online content or cyberbullying) to the Head of Section as soon as possible so that they may be followed up.

#### **Online Safety: General reminders**

- You should not share ANY personal contact information or images online
- You should be mindful of who you are speaking to online and speak to a teacher or your parents if you are concerned
- Ensure your privacy settings are set correctly

#### **Additions to the Pupil Acceptable Use Policy for remote learning during school closure – Juniors**

- I understand that while working at home during a period of school closure I should use the Hub to access my learning and do so in a responsible way.

- I will use the comment and chats appropriately, making sure that I adhere to the usual expectations of behaviour set out in the ICT Acceptable Use Policy that I signed in September 2021. My comments will be polite and relevant.
- I understand that if I misuse the Hub that this will be dealt with by Staff in line with the usual sanction procedure.
- I understand that I should do what I can to limit contact with staff outside of the normal working hours of 8.30am to 3.30pm.
- I understand that any communications I make with my teachers should be on the Hub or via a parent's email account.
- I will not copy or record any school-owned content (e.g. from the Hub) and share this with anyone.
- If, while working on the computer at home, I see anything I am unhappy with or receive a message I do not like, I will show a trusted adult immediately.

### **Additions to the Pupil Acceptable Use Policy for remote learning during school closure – Infants**

**H is for HELP** – An adult at home will help me use the Hub to access my learning and I must only use the internet with their permission

**O is for ONLINE SAFETY** – If I see anything I don't like I will tell an adult

**M is for MESSAGE** – If I want to write a message to my teacher, I will ask an adult to send it from their email account

**E is for ENJOY** – I will use the Hub properly and safely so that I can enjoy learning at home

### **Guidelines for Visiting Music Teachers (VMT)**

#### **Rationale**

1. To enable pupils to continue with their musical studies largely uninterrupted
2. To enable VMTs to continue to provide lessons, and thus to maintain their livelihoods, ensuring that Alleyn's retains its valued body of VMTs once the site has reopened
3. To ensure that VMTs are given appropriate guidance and frameworks to help them teach their pupils remotely in an appropriately safe and regulated manner
4. To continue to provide a high-quality individual music teaching provision.

#### **Remote Lessons**

1. Timing of lessons should of course be mutually convenient, but whilst students are being asked to follow a revised school timetable, VMTs should rotate lesson times from week to week. There will be some flexibility with this, as academic lessons may be easier for students to make up at another time, unless the lesson involves contact with the class teacher. If an alternative or fixed time is preferred by both parties, then that is of course fine and can be arranged between you and the pupil's parents.
2. Students could make an audio recording of something they have been working on and send it to their teacher for comment. This could be a piece, exercise, study, scales even, and this could either then be commented on by return email or in person as part of a remote lesson. This would most likely not take the place of a whole lesson, but might be a useful part of it, taking into account the time needed for the teacher to listen and review.

#### **Safeguarding Considerations:**

1. **Safeguarding is as critically important remotely as it is when teaching on-site at school, and any lessons, whether in person or remote, should adhere to the School's Safeguarding and Child Protection Policy, including the addendum covering remote provision.**
2. All the usual safeguarding considerations with regard to 1:1 lessons apply. VMTs are aware of these expectations and are used to teaching 1:1.
3. All VMTs have been subject to the appropriate employment checks and training. The vast majority have had a safeguarding induction refresher within the last few weeks. Those who have not will be asked to conduct this remotely with the DSL / DDSL before being able to hold online lessons.
4. Teaching lessons online presents many of the usual safeguarding issues, but there are some that are unique to or heightened through this method of teaching. The following notes must therefore be observed in this context:
  - Make sure parents have agreed to online lessons in writing in advance.
  - Only use an appropriate platform (see below); lessons should not be conducted over Whatsapp or other unregulated platform, nor via a mobile phone.
  - Personal contact data (phone numbers, private emails etc.) should never be shared between VMTs and their pupils.
  - Lessons should always take place in a suitable environment (i.e. an office or study, not a bedroom or other private space).
  - Teachers should ensure that no personal identifying information can be seen in the background.
  - Appropriate dress should be worn by student and teacher for a formal occasion like a music lesson, and appropriate courtesy and professional language should be deployed at all times.
  - The pupil must take lessons in a room with an open door and a parent/guardian should be present in the house for the duration of the lesson. Parents should be in the room where the lesson is taking place at the start and end of the lesson as a minimum. They are of course welcome to sit in on the whole of any session, but without distracting more than is necessary.
  - Should anything deemed inappropriate occur, the teacher should end the session (without necessarily drawing attention to anything in particular), take a written note and report to the DSL or a DDSL as soon as possible.

#### **Platform**

1. The School's preferred means of "live" interaction is Microsoft Teams, for which both pupil and teacher need a School Office 365 account.
2. Where another platform has to be used, e.g. Skype, Zoom, and this will only be in cases where Microsoft Teams cannot be used, it is imperative that additional safeguarding and security measures are adopted:
  - **Do NOT** use any online platform for live teaching unless you fully understand the privacy settings and have set the privacy permissions to their most secure settings;
  - **Ideally set up a separate account for your online teaching.** Keep it separate from your personal online profiles. Make sure you use an appropriate image for your profile picture, and do not share any personal information about yourself eg personal telephone number, email accounts, Facebook and other social media links;
  - **Use the parents' or guardians' own account if possible** rather than a child's, to deliver lessons. Alternatively, ask them to set one up in their name and under their control;
  - Participants should not be allowed to record, send files, save written chat messages or share their computer screens. Passwords should always be used for meetings;
  - Ensure that Meeting IDs are secured with a password and the meeting ID and password are shared as separate codes to parents via email. **Under NO circumstances should Meeting IDs and passwords be shared in the public domain;**

- The 'owner' of the meeting should change settings so pupils cannot share their own computer screen. If they try they will be told that they do not have permission:
  - The only person able to share their screen will be the teacher. This prevents the participants sharing anything they shouldn't;
- Where possible, the student should join a 'lobby' before joining the 'Meeting':
  - This allows the teacher to verify participants before starting the lesson;
  - This safeguards against unknown people joining the meeting;
- Once the meeting has started the teacher's settings must be set to give them full control:
  - They can mute all participants or individuals;
  - They can turn participants cameras off if required;
  - They can ask participants to leave the meeting if they need to or remove them to the 'lobby';
- Once the lesson has finished, the teacher should end the meeting for all participants so no one is able to chat once the meeting is over.

Please note: For using Zoom, the following training video:

<https://learning.alleyns.org.uk/it-support/remote-tl-resources-for-staff/zoom> covers all the above.

### **Recording lessons**

1. Given the chance that these recordings could be shared, we advise against this. If it is felt to be absolutely necessary from a learning perspective, always discuss this with pupils and parents in advance, including whether you permit them to record lessons. You must never record a lesson without the prior knowledge and written consent of the pupil and the parents/guardians.
2. If you decide you do wish to record lessons:
  - Ask for consent in writing before you make any recording.
  - Have a written policy available to parents which states:
    - what you will do with the recordings and that you will only ever use them for the purpose of tuition for the individual pupils;
    - how long you will keep them and why;
    - that you guarantee you will only ever share the recording with the pupil or the parents/guardians;
    - How you will dispose securely of the recordings at the end of your retention period;
    - That you will securely delete and dispose of recordings as quickly as possible if your pupils or their parents withdraw consent;
    - Update your GDPR Data Protection Privacy Statement and record of processing to reflect this.

### **Return to physical lessons**

1. Depending on the duration of the School's physical closure, some lessons could be moved towards the end of the academic year. In this event, the distribution of lessons will of course be uneven, but staff would still aim to offer 30 lessons across the year. There may also be the option of making the school facilities available for this during the school holidays (Summer), assuming that any closure has come to an end, and necessary cleaning procedures, etc have been completed.

2. Once lockdown measures have been lifted by the Government, arranging lessons to take place at a different location, such as the teacher's or your own home may be an option. However, any lesson in a child's or VMTs home must obviously be with the supervision of another adult, e.g. a parent, who should be in the home throughout the lesson. If VMTs need to travel then it would seem appropriate that the additional time is reflected in the charge, but this is a matter between the VMT and the contracting parent.

See also <https://www.ism.org/advice/safeguarding-for-remote-lessons>

## **Guidelines for LAMDA teachers**

### **Rationale**

1. To enable pupils to continue with their LAMDA studies largely uninterrupted
2. To enable LAMDA teachers to continue to provide lessons, and thus to maintain their livelihoods, ensuring that Alleyn's retains its valued body of LAMDA teachers once the site has reopened
3. To ensure that LAMDA teachers are given appropriate guidance and frameworks to help them teach their pupils remotely in an appropriately safe and regulated manner
4. To continue to provide a high quality LAMDA teaching provision.

### **Remote Lessons**

- Timing of lessons should be mutually convenient and agreed with parents.
- LAMDA lessons should be taking place between 2 and 4pm in the afternoons when children may be pursuing co-curricular activities. They are not to take place in the mornings or at lunch times.

### **Safeguarding Considerations:**

1. **Safeguarding is as critically important remotely as it is when teaching on-site at school, and any lessons, whether in person or remote, should adhere to the School's Safeguarding and Child Protection Policy, including the addendum covering remote provision.**
2. All the usual safeguarding considerations with regard to small group lessons apply. LAMDA teachers are aware of these expectations and are used to teaching small groups.
3. All LAMDA teachers have been subject to the appropriate employment checks and training. The vast majority have had a safeguarding induction refresher within the last few weeks. Those who have not will be asked to conduct this remotely with the DSL / DDSL before being able to hold online lessons.
4. Teaching lessons online presents many of the usual safeguarding issues, but there are some that are unique to or heightened through this method of teaching. The following notes must therefore be observed in this context:
  - Make sure parents have agreed to online lessons in writing in advance.
  - Only use an appropriate platform (see below); lessons should not be conducted over Whatsapp or other unregulated platforms, nor via a mobile phone.
  - Personal contact data (phone numbers, private emails etc.) should never be shared between LAMDA teachers and their pupils.
  - Lessons should always take place in a suitable environment (i.e. an office or study, not a bedroom or other private space).
  - Teachers should ensure that no personal identifying information can be seen in the background.
  - Appropriate dress should be worn by student and teacher for a formal occasion like a LAMDA lesson, and appropriate courtesy and professional language should be deployed at all times.
  - The pupil must take lessons in a room with an open door and a parent/guardian should be present in the house for the duration of the lesson. Parents should be in the room where the lesson is taking place at the start and end of the lesson as a minimum. They are of course

welcome to sit in on the whole of any session, but without distracting more than is necessary.

- Should anything deemed inappropriate occur, the teacher should end the session (without necessarily drawing attention to anything in particular), take a written note and report to the DSL or a DDSL as soon as possible.

### Platform

1. The School's preferred means of "live" interaction is Microsoft Teams, for which both pupil and teacher need a School Office 365 account.
2. Where another platform has to be used, e.g. Skype, Zoom, and this will only be in cases where Microsoft Teams cannot be used, it is imperative that additional safeguarding and security measures are adopted:
  - Do **NOT** use any online platform for live teaching unless you fully understand the privacy settings and have set the privacy permissions to their most secure settings;
  - **Ideally set up a separate account for your online teaching.** Keep it separate from your personal online profiles. Make sure you use an appropriate image for your profile picture, and do not share any personal information about yourself eg personal telephone number, email accounts, Facebook and other social media links;
  - **Use the parents' or guardians' own account if possible** rather than a child's, to deliver lessons. Alternatively, ask them to set one up in their name and under their control;
  - Participants should not be allowed to record, send files, save written chat messages or share their computer screens. Passwords should always be used for meetings;
  - Ensure that Meeting IDs are secured with a password and the meeting ID and password are shared as separate codes to parents via email. **Under NO circumstances should Meeting IDs and passwords be shared in the public domain;**
  - The 'owner' of the meeting should change settings so pupils cannot share their own computer screen. If they try they will be told that they do not have permission:
    - The only person able to share their screen will be the teacher. This prevents the participants sharing anything they shouldn't;
  - Where possible, the student should join a 'lobby' before joining the 'Meeting':
    - This allows the teacher to verify participants before starting the lesson;
    - This safeguards against unknown people joining the meeting;
  - Once the meeting has started the teacher's settings must be set to give them full control:
    - They can mute all participants or individuals;
    - They can turn participants cameras off if required;
    - They can ask participants to leave the meeting if they need to or remove them to the 'lobby';
  - Once the lesson has finished, the teacher should end the meeting for all participants so no one is able to chat once the meeting is over.

Please note: For using Zoom, the following training video:

<https://learning.alleyns.org.uk/it-support/remote-tl-resources-for-staff/zoom> covers all the above.

### Recording lessons

1. Given the chance that these recordings could be shared, we advise against this. If it is felt to be absolutely necessary from a learning perspective, always discuss this with pupils and parents in



advance, including whether you permit them to record lessons. You must never record a lesson without the prior knowledge and written consent of the pupil and the parents/guardians.

2. If you decide you do wish to record lessons:

- Ask for consent in writing before you make any recording.
- Have a written policy available to parents which states:
  - what you will do with the recordings and that you will only ever use them for the purpose of tuition for the individual pupils;
  - how long you will keep them and why;
  - that you guarantee you will only ever share the recording with the pupil or the parents/guardians;
  - How you will dispose securely of the recordings at the end of your retention period;
  - That you will securely delete and dispose of recordings as quickly as possible if your pupils or their parents withdraw consent;
  - Update your GDPR Data Protection Privacy Statement and record of processing to reflect this.

See also <https://www.ism.org/advice/safeguarding-for-remote-lessons>

## **Remote Counselling: Guidelines for Counsellors**

### **Rationale**

- To enable pupils to continue with their counselling sessions largely uninterrupted, should they wish to remain in contact in this way
- To assess risk to the pupil if they choose not to have remote counselling sessions. If it is decided that this is not the preferred method of communication, to continue to communicate with the pupil and/or parent/carer by email during this period, where appropriate
- To actively consider the waiting list and needs of staff and Alleyn's families during this time if session distribution allows
- To ensure that Counsellors are given appropriate guidance and frameworks to help them engage with their counselling pupils remotely in an appropriately safe and regulated manner
- To continue to provide a high-quality individual counselling provision
- For the Lead Counsellor to provide remote triage on site. Pupils/parents/carers can contact [counselling@alleyns.org.uk](mailto:counselling@alleyns.org.uk) should they wish to book a triage appointment
- To ensure with each pupil that they understand that the usual safeguarding protocols would remain and that if the Counsellor became concerned about their welfare, they would speak with the DSL or DDSL in the usual way
- In addition, at the first session, for the Counsellors to inform the pupils about the changes to the risk procedure due to the pupil being at home. If the Counsellors became concerned about the pupil they would contact their parent(s) before the School
- To have access to Schoolbase online in order to access to parents' phone numbers and DSL and DDSL contacts at the beginning of each session
- For the Counsellors to ensure that their professional indemnity insurance covers us to work in this way
- For the other three school Counsellors to remain in regular contact with the Lead Counsellor, DSL and DDSL as appropriate by email or phone regarding safeguards and any issues that arise at that time
- In advance of the first online session, for the Counsellors to send parents a permission sheet and pass on this information to pupils accordingly, as they wish

## Remote Lessons:

Timing of counselling sessions should of course be mutually convenient, but whilst pupils are being asked to follow a revised school timetable, Counsellors should rotate lesson times from week to week. There will be some flexibility with this, as academic lessons may be easier for pupils to make up at another time, unless the lesson involves contact with the class teacher.

## Safeguarding Considerations:

1. **Safeguarding is as critically important remotely as it is when on-site at school, and any counselling sessions, whether in person or remote, should adhere to the School's Safeguarding and Child Protection Policy, including the addendum covering remote provision.**
2. All the usual safeguarding considerations with regard to 1:1 sessions apply. School Counsellors are aware of these expectations and all of their sessions are conducted on a 1:1.
3. All Counsellors have been subject to the appropriate employment checks and safeguarding training.
4. Counselling sessions online presents many of the usual safeguarding issues, but there are some that are unique to or heightened through this method of interaction. The following notes must therefore be observed in this context:
  - Make sure that Lower School and Middle School parents have agreed to online sessions in writing in advance, unless there are ethical considerations not to.
  - Personal mobile data (phone numbers, private emails etc.) should never be shared between Counsellors and their pupils.
  - Sessions should always take place in a suitable environment.
  - The parent/carer should be present in the house for the duration of the session.
  - Counsellors should ensure that no personal identifying information can be seen in the background.
  - Appropriate dress should be worn by pupil and Counsellor, and appropriate courtesy and professional language should be deployed at all times

## Platform

1. The Counsellor's preferred means of "live" interaction is Zoom and if preferred by parents and pupils, Microsoft Teams is also available by prior agreement with the Counsellor.
2. It is imperative that the following safeguarding and security measures are adopted when using Zoom
  - Do **NOT** use any online platform for live counselling unless you fully understand the privacy settings and have set the privacy permissions to their most secure settings;
  - **Ideally set up a separate account for counselling purposes.** Keep it separate from your personal online profiles. Make sure you use an appropriate image for your profile picture, and do not share any personal information about yourself e.g. personal telephone number, email accounts, Facebook and other social media links;
  - Participants should not be allowed to record, send files, save written chat messages or share their computer screens. Passwords should always be used for meetings;
  - Ensure that Meeting IDs are secured with a password and the meeting ID and password are shared as separate codes to pupil's school email. **Under NO circumstances should Meeting IDs and passwords be shared in the public domain;**
  - The 'owner' of the meeting should change settings so pupils cannot share their own computer screen. If they try, they will be told that they do not have permission:
  - The only person able to share their screen will be the Counsellor. This prevents the participants sharing anything they shouldn't;
  - Once the meeting has started the Counsellor's settings must be set to give them full control:
  - They can mute the pupil;

- They can turn the pupil's camera off if required;
- They can ask the pupil to leave the meeting if they need to or remove them to the 'lobby';
- Once the session has finished, the Counsellor should end the meeting for the pupil so no one is able to chat once the meeting is over.

Please note: For using Zoom, the following training video:

<https://learning.alleyns.org.uk/it-support/remote-tl-resources-for-staff/zoom> covers all the above.

### **Return to physical counselling sessions:**

Depending on the duration of the School's physical closure, some sessions could be moved towards the end of the academic year. In this event, the distribution of lessons will of course be uneven.

### **Remote Counselling: Guidelines for Parents**

- Safeguarding is as critically important remotely as it is when on-site at school, and any counselling sessions, whether in person or remote, should adhere to the School's Safeguarding and Child Protection Policy, including the addendum covering remote provision.
- All the usual safeguarding considerations with regard to 1:1 sessions apply. School Counsellors are aware of these expectations and all of their sessions are conducted on a 1:1.
- All Counsellors have been subject to the appropriate employment checks and safeguarding training.
- Counselling sessions online presents many of the usual safeguarding issues, but there are some that are unique to or heightened through this method of interaction. The following notes must therefore be observed in this context.

In order to ensure sessions are as professional, helpful and containing as possible we would ask the following:

- The platform of choice is Zoom, however Microsoft Teams is also available if preferred.
- Personal mobile data (phone numbers, private emails etc.) should never be shared between Counsellors and their pupils.
- Sessions should always take place in a suitable environment. Please find somewhere completely confidential and comfortable where your child can feel that they are in a safe, confidential space. Please make sure that your child knows they will not be interrupted or overheard. If you are struggling to find an appropriate setting, please talk this through with the Counselling team who will help think through the logistics.
- The Counsellor will invite your child to the Zoom (or Teams if preferred) session in advance with an email link. Your child will be asked to click on the invite their Counsellor has sent and to join with video and audio settings.
- Please test out Zoom (or Teams) on your computer before your first session to minimize disruptions.
- Please use a device (tablet/PC/ipad) and not a phone for Zoom (or Teams) sessions that take place at home.
- The sessions will not be recorded by the Counsellor and must not be recorded by the pupil.
- It is vital that the Counsellor is able to contact parents in case of emergency during the session. Please ensure that you are available on the contact numbers you have given to School in case of emergency.

- A parent/guardian/carer should be present in the house for the duration of the session.

### Instructions for Zoom

- To use Zoom you need to have a camera and audio in your computer, and reliable broadband or 4G signal;
- Download Zoom from <https://zoom.us/>;
- It's also available as an app from the Google Play and Apple App Store;
- Start by signing up <https://zoom.us/signup>;
- Do not use Google or Facebook to sign up – this is not secure;
- Keep your Zoom account entirely separate;
- Once you have signed up, download the software, you'll find Zoom listed under your programmes once you have downloaded it;
- Please note underneath the audio arrow is a test speaker and microphone tab. We strongly recommend you do this before you use Zoom for the first time;
- The video should work automatically but if it doesn't then you can click on the arrow next to the video icon on the bottom left of your screen and choose to join with the computer's video camera;
- The Counsellor will send the pupil an email with a link inviting them to the Zoom session with them. The pupil will need to click on the link and follow the instructions.

Please indicate below that you give your consent for your child/adolescent to have live remote counselling sessions on the terms above:

*Personal data (including sensitive counselling information) will be processed securely and confidentially by the appropriate counselling professional in accordance with data protection law.*

Yes:                      No

(Please add a cross to one)

Signature:      Date:

(Please just type your name)

## **Remote Counselling: Guidelines for Pupils**

**So that these sessions can be as helpful as possible we would ask the following:**

- Please find somewhere comfortable where you can feel that you are in a safe, confidential space. This needs to be a space where you won't be interrupted or overheard. If you are struggling to find an appropriate place, please talk this through with the Counselling team who will help think this through.
- Please test out Zoom video on your computer before your first session. In particular make sure you know how to unmute yourself.
- Please use a tablet or computer/laptop for your sessions, and NOT your phone.
- These sessions will not be recorded.
- Personal mobile data (phone numbers, private emails etc.) should never be shared between counsellors and pupils.

**And here is some information about the call:**

- You will receive an e-mail to your Alleyn's e-mail address, inviting you to join your Zoom session. You just need to click on the link to enter a waiting room. Your Counsellor will then link you into the session.
- If you need further information about how Zoom works you can ask your Counsellor by e-mail prior to the session.
- Your Counsellor will be working from a confidential space either in their home or at school.

### **Instructions for Zoom**

- To use Zoom you need to have a camera and audio in your computer, and reliable broadband or 4G signal. · Download Zoom from <https://zoom.us/>;
- It's also available as an app from the Google Play and Apple App Store. · Start by signing up <https://zoom.us/signup>;
- Do not use Google or Facebook to sign up – this is not secure;
- Keep your Zoom account entirely separate;
- Once you have signed up, download the software, you'll find Zoom listed under your programmes once you have downloaded it;
- Please note underneath the audio arrow is a test speaker and microphone tab. We strongly recommend you do this before you use Zoom for the first time;
- The video should work automatically but if it doesn't then you can click on the arrow next to the video icon on the bottom left of your screen and choose to join with the computer's video camera.

## **Appendix 3**

### **Statutory guidance and other advisory documents informing this policy**

1. Paragraphs 7 and 16 of the Schedule to the Education (Independent School Standards) Regulations 2014
2. DfE guidance Keeping Children Safe in Education – Sep 2021
3. DfE guidance Disqualification under the Childcare Act 2006
4. Part 3 of the Statutory Framework for the Early Years Foundation Stage 2017
5. Working Together to Safeguard Children – updated Dec 2020
6. Pan London Child Protection Procedures and Practice Guidance (September 2020)
7. Guidance from Southwark Safeguarding Children Partnership
8. What to do if you're worried a child is being abused, 2015
9. Information Sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018)
10. Prevent Duty Guidance for England and Wales (originally issued March 2015 revised July 2015)
11. Guidance for safer working practice for those working with children and young people in education settings, May 2019
12. Counselling in schools: a blueprint for the future (Feb 2016)
13. Cyberbullying: Advice for headteachers and school staff
14. Mental health and behaviour in schools: departmental advice (March 2016)
15. Teacher misconduct: the prohibition of teachers – Oct 2015
16. Sexual violence and sexual harassment between children in schools and colleges – Sep 2021
17. The Education (Pupil Registration) (England) Regulations 2006
18. The Safer Recruitment Consortium (various publications)

## Appendix 4 – Specific Safeguarding Issues

### 1. Domestic abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. 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. 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 also 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

If members of staff have a concern about or knowledge of any domestic abuse incidents, they must share it immediately with the DSL, with a view to referring to appropriate agencies.

Information is available about Domestic abuse and how to get help in Southwark. Southwark Council's support and service provider Solace (020 7593 1290, [southwark@solacewomensaid.org](mailto:southwark@solacewomensaid.org)) offer free and confidential support for women and men aged 16 or over who are survivors of domestic abuse.

#### 1.1 Operation Encompass

The School works in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. The system ensures that when police are called to an incident at a home, the key adult in school (usually the DSL) will be informed before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

In order to achieve this, the Multi-Agency Safeguarding Hub ([MASH](#)) will share police information with the DSL of all domestic incidents where a pupil has been present. On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert and dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with the Metropolitan Police and MASH Encompass Protocol Data Sharing Agreement. The school will record and store the information received in accordance with the record keeping procedures outlined in this policy.

Further information is available via [Operation Encompass](#). See also, the National Domestic Abuse Helpline (run by Refuge) which is a 24 hour freephone helpline - 080 8 200 0247

### 2. Mental Health

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; however, staff are well placed to observe pupils day-to-day and to 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 other potentially traumatic adverse childhood

experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. Approximately 1 in 10 children aged under 15 years and 1 in 4 adolescents aged 16 & 17 experience mental health problems.

### **Signs of mental health problems**

It is important to recognise that all children and young people are different, and the signs and indicators of mental health difficulties will differ. Some common signs are listed below.

- sadness, or a low mood persisting for two weeks or more
- Repeated medical symptoms with no obvious cause e.g. stomach aches & headaches
- increase in irritability, recklessness or aggression
- worries that stop them carrying out day-to-day tasks
- sudden outbursts of anger directed at themselves or others
- not being interested in things they used to enjoy
- feeling tired and exhausted a lot of the time
- inability to concentrate
- lack of confidence
- unable to relax
- changes in weight
- feeling guilty or worthless, talking negatively about themselves
- feeling empty or unable to feel emotions (numb)
- poor self-care
- refusing to go to school and/or decline in academic performance
- thoughts about suicide or self-harming
- actually self-harming, for example, signs of cutting their skin or taking an overdose
- panic attacks
- obsessive or compulsive behaviour
- self-harm
- misuse of drugs or alcohol

### **Issues that increase the risk of mental health problems include:**

- family difficulties
- bullying
- physical, emotional or sexual abuse
- a family history of depression or other mental health problems
- difficult life event e.g. family separation, divorce, a bereavement
- academic problems
- difficulties with peers

If staff have a mental health concern about a child this should be reported to the DSL with a view to obtaining support for the child and referral to appropriate agencies.

Further advice on mental health issues may be found in

*Mental Health and Behaviour in Schools*

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

and in *Promoting Children and Young People's Emotional Health and Well-being*

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

### **3. Peer on peer/child on child abuse (also see School Anti-bullying Policy and Rewards & Sanctions Policy and the Recognition Policy of the AJS)**

Children are capable of abusing their peers. This can happen both inside and outside of school, and online, and can take many different forms:

- Bullying (including cyberbullying)



- Prejudice-based and discriminatory bullying
- Physical harm (such as hitting, kicking, shaking, biting, hair pulling)
- Causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse
- violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals
- Forcing other children to use drugs or alcohol
- Emotional abuse (blackmail or extortion, threats and intimidation)
- Sexual violence, such as rape, assault by penetration
- Sexual harassment; such as sexual comments, remarks, jokes and online sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Sexual abuse (indecent exposure, indecent touching or serious sexual assaults)
- Encouraging other children to engage in inappropriate sexual behaviour
- Forcing other children to watch pornography or take part in sharing of nudes and semi-nude images
- Sexual exploitation – including:
  - 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
  - Photographing or videoing other children performing indecent acts
  - Having an older boyfriend/girlfriend
  - Associating with unknown adults or other sexually exploited children
  - Staying out overnight
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.

Although it is more likely that girls will be victims and boys perpetrators, all peer on peer/child on child abuse is unacceptable and will be taken seriously. The School does not tolerate such behaviour or pass it off as “banter”, “just having a laugh” or “part of growing up”.

Staff should be aware that specific groups of children may be particularly vulnerable to peer on peer/child on child abuse. These include children with special needs and children who are lesbian, gay, bi or trans (LGBT). 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.

A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this to the DSL following the reporting procedures outlined in this policy.

Depending on the circumstances, a pupil's behaviour may require a response under child protection procedures rather than behaviour or anti-bullying procedures. If a pupil has suffered or is likely to suffer significant harm, or the alleged abuse would, if proved, be a criminal offence, a referral to Children's Services and the police will be made.

In both the Senior and Junior Schools there are anti-bullying policies (which contain the peer on peer/child on child abuse policy) with the definition of bullying as: *Bullying is the wilful desire to hurt another, physically, verbally or emotionally and to put him/her under stress. The intimidation can be and often is repeated and is usually carried out by those individuals or groups who are more powerful. On-lookers to incidents of bullying can be seen as complicit.*

The anti-bullying policies set out the ways in which the School addresses the negative effect that bullying and peer abuse can have on the flourishing of individuals. Regularly in the academic year the issue of bullying is raised in assemblies or in tutor time.

The School, thus, has a strong commitment to anti-bullying and will consider all coercive acts and peer

on peer/child on child abuse within a safeguarding and Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the School's Rewards and Sanctions Policy. Alleyn's aims to minimise the risk of allegations against other pupils by providing a developmentally appropriate PSCE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe (see below), having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, and their willingness to talk valued. The School will deliver targeted work on assertiveness and keeping safe to any pupil identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. It is important that all our staff recognise the indicators and signs of peer on peer/child on child abuse and know how to identify it and respond to reports. Any possible peer on peer abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance in [Preventing and Tackling Bullying](#).

Two (appointed for the role) members of staff provide a safe space for the reporting of concerns about any treatment due to racial differences or behaviours linked to any person from a racial minority. These concerns are discussed with the pupil/s to guide on a way to address what could range from a microaggression to an abuse based on race. The members of staff register the concerns on CPOMS, speak to relevant staff, if appropriate, and guide pupils on next steps. The ability to speak to these members of staff is brought to pupils' attention via Sectional assemblies.

If the peer-on-peer/child on child relation concern involves sexual behaviour, pupils are encouraged to speak to a senior member of staff who provides a 'safe space' for raising matters of this kind of concern. There is staff training to raise awareness of the importance of being observant of and reactive to any concerns about sexualised behaviour between pupils. In every classroom the NSPCC Childline number is displayed and the attention of the pupils is drawn via Section Assemblies to that facility available to them, if they have concerns and do not want to report those concerns at school. A Senior member of staff leads on staff, parent and pupil training, working alongside the Senior Deputy Head. This member of staff provides a 'safe space' for pupils to use should they wish to report any concerns about themselves or any other pupil both in person and online. This 'safe space' is advertised to the pupils in assemblies and relevant PSCE and tutor time. The NSPCC helpline number is 0800 136 663 and more information is available at: <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

As part of encouraging a healthy, safer lifestyle, PSCE lessons address, for example, how to:

- recognise and manage risks in different situations and then decide how to behave responsibly <sup>[L]</sup><sub>[SEP]</sub>
- recognise the dangers of peer abuse when pressure from others (including people they know) threatens pupils' personal safety and well-being; including knowing when and where to get help
- apply assertiveness techniques to resist unhelpful pressure <sup>[L]</sup><sub>[SEP]</sub>
- judge what kinds of physical contact are acceptable and unacceptable
- appreciate what constitutes sexual violence and harassment, and how to react if concerned <sup>[L]</sup><sub>[SEP]</sub>
- to appreciate the value of emotional literacy and ways of achieving it

Alleyn's School follows the recently published advice on cyberbullying in schools:

*Cyberbullying: Advice for headteachers and school staff*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374850/Cyberbullying\\_Advice\\_for\\_Headteachers\\_and\\_School\\_Staff\\_121114.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

#### **4. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18

- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. We also note the DfE's [Searching Screening and Confiscation Advice](#) for schools.

The sharing of sexual photos and videos of under 18-year olds with or by adults is a form of child sexual abuse and will be referred to the police.

Staff must

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

## **5. Sexual harassment, online sexual abuse and sexual violence**

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the School, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)". All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. We will keep comprehensive records of all allegations.

## **6. Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence

and harassment between children, both on and outside school premises, in line with 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)" and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Pupils are encouraged to speak to a senior member of staff who provides a 'safe space' for raising matters of this kind of concern. There is staff training to raise awareness of the importance of being observant of and reactive to any concerns about sexualised behaviour between pupils. In every classroom, the NSPCC Childline number is displayed and the attention of the pupils is drawn via Section Assemblies to that facility available to them, if they have concerns and do not want to report those concerns at school. A Senior member of staff leads on staff, parent and pupil training, working alongside the Senior Deputy Head. This member of staff provides a 'safe space' for pupils to use should they wish to report any concerns about themselves or any other pupil both in person and online. This 'safe space' is advertised to the pupils in assemblies and relevant PSHE and tutor time. The NSPCC helpline number is 0800 136 663 and more information is available at: <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

### **Sexual violence**

It is important that staff are aware that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence this means sexual offences under the Sexual Offences Act 2003 as described including rape, assault by penetration and sexual assault. A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. Consent is about having the freedom and capacity to choose.

### **Sexual harassment**

- Unwanted conduct of a sexual nature can occur online and offline. When referring to sexual harassment, it is in the context of child on child. 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
- displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment (standalone, or part of a wider pattern of sexual harassment and/or sexual violence).

It may include:

- non-consensual sharing of sexual images and videos
- sexualised online bullying

- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

### Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.

Incidents of sexual violence and harassment are always taken seriously and the School ensures that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, the School will work with relevant external agencies to address the issue, which may include a referral to MASH and a report to the Police.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment are not acceptable and will never be tolerated <sup>[11]</sup><sub>[SEP]</sub>
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.
- Dismissing or tolerating such behaviours risks normalising them.

### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. <sup>[11]</sup><sub>[SEP]</sub> If staff have a concern about a pupil or a pupil makes a report to them, they should follow the referral process as set out in this policy. Staff must share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators).

In immediately responding to any concern about sexual violence or harassment, the DSL or DDSL will (in consultation with the Head) take into account of:

- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident?
- is the alleged incident a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, or staff?
- any other related issues and wider context

Further information is available in KCSIE (Sep 2021) and *Sexual violence and sexual harassment Between Children in Schools and Colleges* (Sep 2021) provides further information and links to resources.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

## 7. Sexualised behaviour of children

Developmental sexual activity covers those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Abusive sexual

activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. The determination of whether behaviour is developmental or inappropriate will hinge around the related concepts of true consent, power imbalance and exploitation.

Sexualised behaviour should be seen as a continuum ranging from:

Normal - Inappropriate - Problematic - Abusive – Violent

#### **Normal behaviour**

- Developmentally expected and socially acceptable behaviour
- Consensual, mutual and reciprocal
- Decision making is shared

#### **Inappropriate behaviour**

- Single instances of developmentally inappropriate sexual behaviour
- Behaviour that is socially acceptable within a peer group
- Generally consensual and reciprocal
- May involve an inappropriate context for behaviour that would otherwise be considered normal

#### **Problematic and concerning behaviour**

- Developmentally unusual and socially unexpected behaviour
- May be compulsive
- Consent may be unclear and the behaviour may not be reciprocal
- May involve an imbalance of power
- Doesn't have an overt element of victimisation

#### **Abusive behaviour**

- Intrusive behaviour
- May involve a misuse of power
- May have an element of victimisation
- May use coercion and force
- May include elements of expressive violence
- Informed consent has not been given (or the victim was not able to consent freely)

#### **Violent behaviour**

- Physically violent sexual abuse
- Highly intrusive
- May involve violence which is physiologically and/or sexually arousing to the perpetrator
- May involve sadism

It is important for staff to recognise that in young children, behaviour which causes concern may become apparent through their play. Sexualised behaviour which causes concern may indicate that the child has suffered abuse or has witnessed inappropriate material for their age. Any sexualised behaviour which raises concern must be reported to the DSL following the procedures outlined in this policy.

### **8. Pupils who are sexually active**

A child under 13 is not legally capable of consenting to sexual activity and under the Sexual Offences Act, penetrative sex with a child under 13 is classed as rape. If a member of staff becomes aware that a child (whether or not they are a pupil of this school) is involved with penetrative sex, or other intimate sexual activity, there will always be reasonable cause to suspect that the child, whether girl or boy, is suffering or is likely to suffer significant harm and this must be reported to the DSL immediately. The DSL will refer all cases to Children's Services.

Sexual activity under 16 is also an offence. Where there is true consent it may be less serious than if the child were under 13, but may nevertheless have serious consequences for the welfare of the young person. If a member of staff becomes aware that a pupil under 16 is sexually active this must also be referred to the DSL.

Consideration will be given by the DSL as to whether there should be a discussion with other agencies and whether a referral should be made to Children's Services. The DSL will make this assessment using the risk indicators below, as outlined in the London Child Protection Procedures. This will determine how and when information will be shared with parents and the other agencies. All cases will be documented including where a decision is taken not to share information.

### **Risk Indicators**

In order to determine whether a relationship presents a risk of significant harm to a young person, the following factors will be considered:

- Whether the child/young person is competent to understand, and consent to, the sexual activity they are involved in (children under 13 are not legally capable of consenting to sexual activity)
- What the child or young person in the relationship's living circumstances are, whether they are attending school, whether they or their siblings are receiving services from LA Children's Services or another social care agency etc.
- The nature of the relationship between those involved, particularly if there are age or power imbalances as outlined below
- Whether overt aggression, coercion or bribery was or is involved including misuse of alcohol or other substances as a disinhibition
- Whether the child/young person's own behaviour, for example through misuse of alcohol or other substances, places him/her in a position where he/she is unable to make an informed choice about the activity
- Any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship
- Whether methods used to secure a child or young person's compliance and trust and/or secrecy by the sexual partner are consistent with grooming for sexual exploitation. Grooming is likely to involve efforts by a sexual predator (usually older than the child or young person) to befriend a child/young person by indulging or coercing her/him with gifts, treats, money, drugs, developing a trusting relationship with the child/young person's family, developing a relationship with the child or young person through the internet etc. in order to abuse the child/young person
- Whether the sexual partner is known by one of the agencies as having or having had, other concerning relationships with children/young people (which presupposes that checks will be made with the Police)
- Whether the child/young person denies, minimises or accepts the concerns held by professionals

### **9. Child Sexual Exploitation (CSE)**

*Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

Child sexual exploitation: guide for practitioners (2017)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved



in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

In summary, 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. 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. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Alleyn's School:

- recognises that CSE is never the victim's fault
- educates pupils about CSE in various parts of the curriculum including PSCH <sup>[1]</sup><sub>SEP</sub>
- maintains a culture of good communication to ensure parents and any child worried about CSE
- can speak to the School
- engages with relevant agencies in any detected or suspected case of CSE affecting a pupil
- refers immediately to Children's Services any child under the age of 18 who it suspects may be vulnerable to sexual exploitation

The indicators related to CCE listed below can also be indicators of CSE, as can

- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant

## 10. Crime & Child Criminal Exploitation (CCE)

Indicators, which may signal that children are at risk from, or are involved with serious 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 significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Fear and a need for self-protection is also a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns.

All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL.

Further advice is available in *Preventing youth violence and gang involvement*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

**10.1** 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, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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 being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people 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
- children who regularly miss school or education or do not take part in education

## **10.2 County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (*e.g.* knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse 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.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often
- accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## **11. Preventing Radicalisation – 'Prevent'**

The Prevent lead at Allevyn's is the DSL. 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 extremism through radicalisation and the possible participation in terrorism ('the Prevent duty' – referred to simply as 'Prevent').

Young people can be exposed to extremist influences or prejudiced views, in particular via the internet and other social media. Schools can help to protect children from extremist and violent views in the same way that they help to safeguard children in other behavioural contexts.

In KCSIE (Sep 2021), **Extremism** is defined as:

*the 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. This also includes calling for the death of members of the armed forces.*

**Radicalisation** is defined as:

*the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.*

The School recognises that there is no single route to extremism nor is there a simple profile of those who become involved. Thus, attempts to derive a 'profile' can be misleading. It must not be assumed that particular characteristics and experiences will necessarily lead to individuals becoming radicalised, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Further information is contained in the statutory guidance for Channel Panel members and partners of local panels, *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism*, found at: <https://www.gov.uk/government/publications/prevent-duty-guidance> and *Guidance for specified authorities in England and Wales on the duty in the Counter- Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.* <https://www.gov.uk/government/publications/channel-guidance>

The teaching staff and key support staff received training from the Southwark Prevent Coordinator in 2019 offering further advice and support in Prevent issues and the DSL receives additional information to support the management of the Prevent Duty.

To ensure it meet its obligations under Prevent, the School:

- Ensures the DSL receives Prevent training, and trains appropriate staff (including the Head) in Prevent issues
- Makes use of LSCP courses and reading matter, and available material including on-line films drawing attention to the risk of Child Sexual Exploitation in radicalisation
- highlights the issues involved in Prevent at both academic and support staff training sessions, including spotting signs of radicalisation or extremism and identifying Child Sexual Exploitation radicalisation
- ensures staff awareness of the appropriate use of the Channel Panel system

Alleyne's School also engages in a process of general assessment of risk by:

- the DSL and relevant staff use of a Prevent self-assessment form (for example the one provided by Oxfordshire schools)
- maintaining discussion between pastoral staff with a view to identifying pupils with any signs or vulnerability due to behavioural factors
- checking at intake and during a pupil's time at the School any possible geographical issues that might be relevant (e.g., changing address or being aware of holidays spent in vulnerable areas of the world)
- maintaining vigilance about pupil attendance such that any child missing from education can be reported to the authorities immediately

The School also ensures:

- special vigilance about pupils missing from school deploying the electronic registration system to spot problematic absence leading to concerns about missing from education
- vigilance about detecting abusive or derogatory language in the pupils, which may indicate vulnerability to radicalisation and extremism, or an unhealthy attitude to the issue at large in our society, checking especially for racist, homophobic or disability discriminatory language
- it identifies any sign of vulnerability in any of its students, the School makes contact with relevant authorities possibly making a referral to the local Channel Panel or using the DfE

dedicated helpline – such referrals do not require parental consent to make but consultation may be judged to be helpful

- it checks that any visiting speaker is always suitably vetted and supervised especially if invited to speak by pupils (where a member of staff must always take responsibility for knowing beforehand the profile of the visitor and take responsibility for the visit)
- there are sessions on fundamental British values designed to raise the issues in Prevent widely in the curriculum, including – but not exhaustively – in PSHE lessons
- there are opportunities for addressing fundamental British values in the co-curriculum and public events like Assemblies, Year group meetings etc.
- reiterating in the IT Policy the particular danger of radicalisation and vulnerability to extremism posed by social media;
- there are robust IT protections to keep pupils safe from terrorist and extremist materials when accessing the internet at school.
- it refers children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub (MASH). The MASH will share the referral details of new referrals with the Prevent lead police officer and the Southwark Prevent Coordinator at the point the referral is received.

There is the possibility for any member of staff to contact the local police force using the 101 non-emergency number and a DfE dedicated telephone helpline/mailbox offering non-emergency advice for staff and governors on 020 7340 7264 and online at [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [\*Prevent duty guidance: for England and Wales\*](#), especially paragraphs 57-76.

**Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In a Prevent referral, the Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

**Indicators that an individual is engaged with an extremist group, cause or ideology include:**

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups)
- attempts to recruit others to the group/cause/ideology
- communications with others that suggest identification with a group/cause/ideology.

**Indicators that an individual has an intention to use violence or other illegal means include:**

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

**Indicators that an individual is capable of contributing directly or indirectly to an act of terrorism**

**include:**

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism e.g. civil engineering, pharmacology or construction
- having technical expertise that can be deployed e.g. IT skills, knowledge of chemicals, military training or survival skills

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

**Additional support**

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue. <https://educateagainsthate.com/>

**12. Children Missing from Education (CME)**

It is a mandatory duty for the School to have in place systems to report children who go missing from education. This duty reflects the need to protect those vulnerable to radicalisation or sexual exploitation, or sexual abuse. In September 2016, the government published guidance, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

KCSIE (Sep 2021) states:

*All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's ... unauthorised absence and children missing from education procedures.*

Monitoring and reporting longer-term absences in the School is the responsibility of Form teachers and senior Pastoral staff working with sectional administrative staff. The DSL and DDSs check attendance statistics each month and the electronic register is kept up to date by tutors before each month closes. These processes are ultimately the responsibility of the DSL. Any attendance concern related to the safeguarding and welfare of a child results in an immediate contact with the appropriate Local Authority.

As a result, Alleyn's School:

- raises staff awareness in training to the danger posed by pupils missing regular education
- monitors the absence list produced daily by the Section Administrators and the AJS Office
- informs the Local Authority when adding/deleting a child's name to/from the School admissions register, except those leaving or arriving at standard transition points
- reports to the appropriate Local Authority any case of concern about patterns of absence or pupils who fail to attend school regularly and at the latest after 10 days of continuous unpermitted absence
- includes absence data in the formal school reports of Senior School pupils

- contacts the home in cases of unauthorised absence to remind parents of the School protocol on what constitutes authorised absence
- brings cases of concern to the DSL for further action if appropriate

### **13. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this will not replace a referral into Children's Services where a child has been harmed or is at risk of harm. <sup>[L]</sup><sub>[SEP]</sub>

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation.

### **14. So-called 'honour-based' abuse and violence (HBA)**

So-called Honour-based abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider abuse (HBA) network of family or community pressure and can include multiple perpetrators. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If any members of staff have concerns about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they should share concerns immediately with the DSL.

### **15. Female Genital Mutilation (FGM)**

FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. FGM causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. It is practised by families for a variety of complex reasons but often in the belief that it is beneficial for the girl or woman. The practice is illegal in the UK. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM.

Some girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to 'heal' before they return to school. Some girls may have FGM performed in the UK. FGM is child abuse and a form of violence against women and girls (VWAG) (see below).

Alleyn's School:

- emphasises that whilst **all** staff should speak to the DSL (or a deputy DSL) with regard to any concerns about FGM, there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573782/FGM\\_Mandatory\\_Reporting\\_-\\_procedural\\_information\\_nov16\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf)
- Makes clear that staff must, under no circumstances, engage in examining girls for this purpose
- includes the issues raised by FGM in the SS RS curriculum – and what students must do if they suspect another pupil is vulnerable in PSCH lessons
- engages with staff (both academic and support) in training opportunities to raise awareness, especially in addressing signs of abuse specially like FGM
- raises concern in other age-appropriate forums, like Assemblies and occasional talks in Clubs & Societies

Reporting guidance is provided by the Department of Health (Updated 2017) and is available at: [Mandatory Reporting of Female Genital Mutilation – procedural information](#)". A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

## 16. Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they must share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

## 17. 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. Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence or sexual violence
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family

Any concerns about a possible forced marriage case must be shared with the DSL with a view to referring to appropriate agencies.

In line with advice the School:

- includes material on forced marriage in the curriculum, especially in RS and PSCH
- trains staff on the matter
- encourages pupils to discuss concerns about friends or themselves with adult members of the community, never treating the allegation as merely a domestic issue and sending the pupil back home
- checks where possible to establish if a vulnerable student possesses two passports
- with concerns about the safety of an under 18-year old pupil activates safeguarding procedures using multi-agency liaison with police and Children's Services
- uses the Forced Marriage Unit in the Foreign & Commonwealth office for support Telephone: +44 (0) 20 7008 0151, Email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

The Forced Marriage Unit's [statutory guidance](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **18. 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. They 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.

<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

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

<https://helpwithchildarrangements.service.justice.gov.uk/>

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

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **20. Private Fostering**

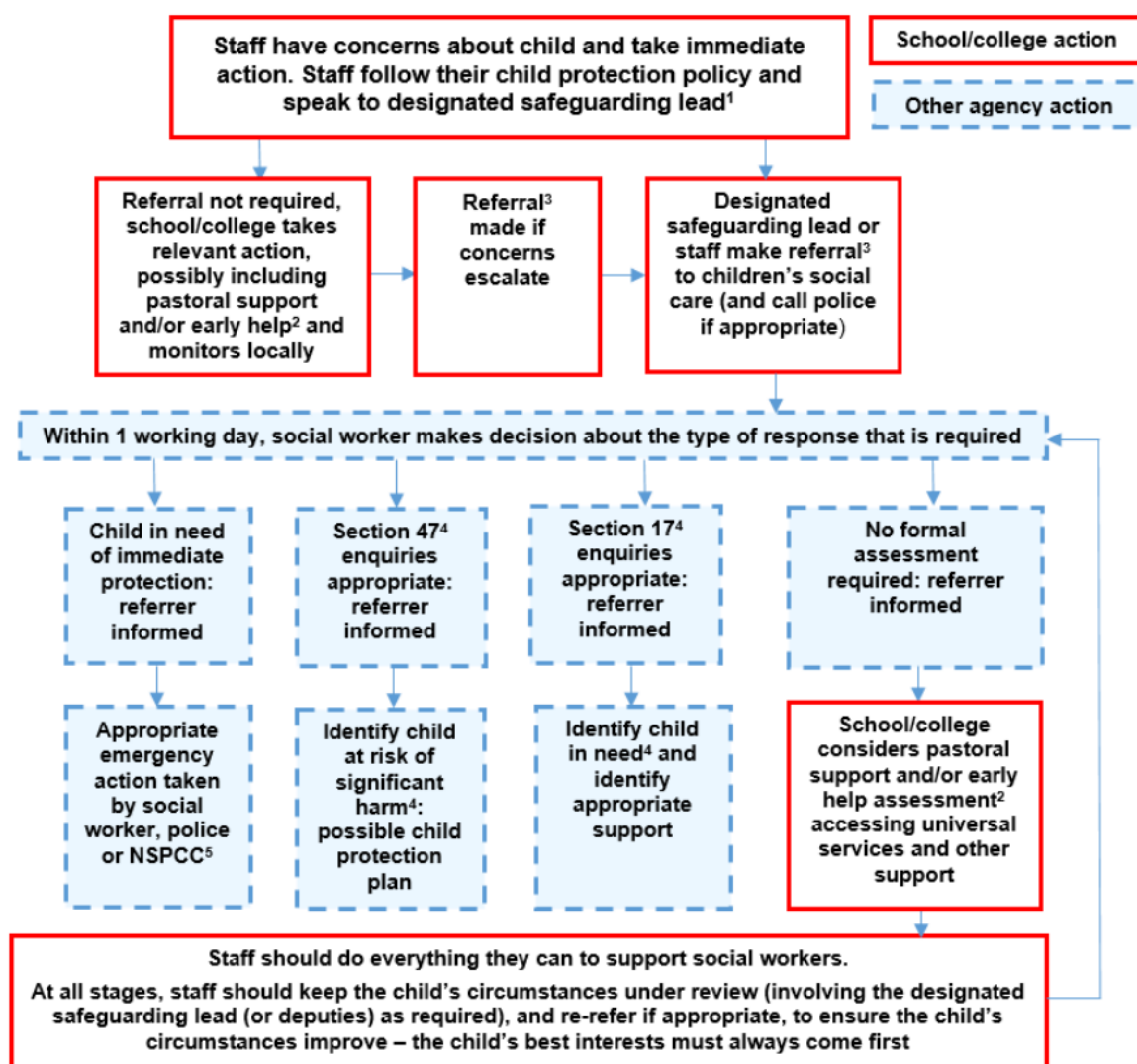
Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If the School becomes aware of a child in a private fostering arrangement within Southwark, it will notify the council's Multi Agency Safeguarding Hub (MASH) by emailing [MASH@southwark.gov.uk](mailto:MASH@southwark.gov.uk) or calling 020 7525 1921. Advice about whether there is a need to notify the council, can be obtained by calling 07539 346808 or sending an email to [privatefosteringadvice@southwark.gov.uk](mailto:privatefosteringadvice@southwark.gov.uk) In the case of a non-Southwark child, we will notify the relevant LA.



## Actions where there are concerns about a child



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

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

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

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

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