



# P1 – Safeguarding and Child Protection Policy

Policy Owner: Deputy Head Pastoral

ISSR Reference: 14b Missing child policy; 15a Attendance policy

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Version Control Information

<b>Reason for Amendment</b>	<b>Role</b>	<b>Date</b>	<b>Main Changes</b>
Annual Review	Designated Safeguarding Lead	Year Michaelmas 2024	In line with KCSiE24

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## KEY EXTERNAL CONTACT DETAILS

<b>Lambeth Integrated Referral Hub</b> for advice about a child protection issue, to enquire about Early Help and to make a child protection referral	Tel: 020 7926 3100 Email: <a href="mailto:helpandprotection@lambeth.gov.uk">helpandprotection@lambeth.gov.uk</a>
<b>London Safeguarding Children’s Board-</b> if your concern regards a child living in another of the 32 London boroughs all contacts are located here	<a href="https://www.londonscb.gov.uk/contacts/safeguarding-contacts/">https://www.londonscb.gov.uk/contacts/safeguarding-contacts/</a>
<b>Lambeth Designated Officer ( LADO)</b> for allegations against staff or volunteers	Andrew Zachariades Tel: 020 7926 4679 or 07720 828 700 Email: <a href="mailto:LADO@lambeth.gov.uk">LADO@lambeth.gov.uk</a>
<b>Lambeth Children’s Safeguarding Partnership</b>	Tel: 0207 926 5555 Email: <a href="mailto:helpandprotection@lambeth.gov.uk">helpandprotection@lambeth.gov.uk</a>
<b>Support and advice about Extremism</b>	Police EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 Email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a> <b>Local Authority:</b> <b>Lambeth’s Prevent Programme Team</b> Tel: 020 7926 3668 Email: <a href="mailto:prevent@lambeth.gov.uk">prevent@lambeth.gov.uk</a> <b>Department for Education:</b>

	NON-EMERGENCY NUMBER: 020 7340 7264 Email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a> <b>For mandatory reporting of FGM to the police: 01483 639673</b>
To report <b>Children Missing in Education (CME)</b>	Tel: 020 7926 6928 Email: <a href="mailto:inclusion@lambeth.gov.uk">inclusion@lambeth.gov.uk</a>
<b>Lambeth Community Early Help Phone Line</b>	Tel: 020 7926 9079
<b>NSPCC Report Abuse in Education Advice Line</b>	Tel: 0800 136 663 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>NSPCC Whistleblowing</b> offers advice and support for professionals with concerns about how child protection issues are handled at Rosemead Preparatory School and Nursery or another organisation	Tel: 0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service (DBS)</b>	Tel: 03000 200 190 Email: <a href="mailto:customerservices@dbs.gov.uk">customerservices@dbs.gov.uk</a>
<b>Teaching Regulatory Agency</b>	Tel: 0207 593 5393 Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	Tel: 0300 123 4666 (Mon-Fri 8am to 5pm) Email: <a href="mailto:CIE@Ofsted.gov.uk">CIE@Ofsted.gov.uk</a>
<b>Independent Schools inspectorate</b>	Tel: 0207 6000100 Email: <a href="mailto:concerns@isi.net">concerns@isi.net</a>

**KEY SCHOOL CONTACT DETAILS-Rosemead Preparatory School and Nursery Safeguarding Team**

<b>DSL of whole school including EYFS and Prevent Lead</b>	<b>Lisa Meredith-Bennett</b> Head of Pre-Prep Tel: 0208 655 9556 Email: <a href="mailto:lisa.meredith-bennett@rosemeadprepschool.org.uk">lisa.meredith-bennett@rosemeadprepschool.org.uk</a>
<b>DDSL of whole school</b>	<b>Graeme McCafferty</b> Acting Head Tel: 0208 655 9558 Email:

	<a href="mailto:graeme.mccafferty@rosemeadprepschool.org.uk">graeme.mccafferty@rosemeadprepschool.org.uk</a>
<b>DDSL of whole school Mental Health Lead</b>	<b>Lesley Kastoryano</b> <b>Senior Deputy Head</b> <b>Tel: 0208 655 9554</b> <b>Email:</b> <a href="mailto:lesley.kastoryano@rosemeadprepschool.org.uk">lesley.kastoryano@rosemeadprepschool.org.uk</a>
<b>SENDCO and DDSL of whole school Responsibility for Looked After Children</b>	<b>Kate Tyrrell</b> <b>SENDCO</b> <b>Tel: 0208 8670 5865</b> <a href="mailto:kate.tyrrell@rosemeadprepschool.org.uk">kate.tyrrell@rosemeadprepschool.org.uk</a>
<b>Safeguarding Governor</b>	<b>Jonathan Ronan (details available from)</b> <a href="mailto:clerk@stdunstans.org.uk">clerk@stdunstans.org.uk</a>
<b>Chair of Governors</b>	<b>Paul Durgan(details available from)</b> <a href="mailto:clerk@stdunstans.org.uk">clerk@stdunstans.org.uk</a>

## 1. Aims

St Dunstan’s Education Group (‘the Group’) aims to ensure that parents / carers in contract with the Group:

Rosemead Preparatory School and Nursery is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil and recognises that safeguarding is everyone’s responsibility. We are committed to ensuring that a rigorous safeguarding culture is maintained. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We will always act in the best interests of the child.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Ensuring a safeguarding culture where staff are vigilant and professionally curious is embedded practice.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Ensuring all visitors and adults who work with our children receive the appropriate information and/or training in line with this policy.

Governors, school employees and those associated with the school take seriously their responsibilities under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm. We recognise that everyone who comes into contact with a child and his/her family has a role to play in identifying concerns, sharing information and taking prompt action in order to ensure that they receive appropriate help. We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

The Purpose and aims of this policy are:

- To support the child's development in ways that will foster security, confidence and independence.
- To ensure staff follow the statutory guidance in KCSiE 24 when carrying out their duties to safeguard and promote the welfare of children.
- To provide a safe environment in which children can learn. Children should feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To ensure that all staff are aware that it is their responsibility to play an active role in ensuring the safety of all the children in the school and to follow Rosemead Preparatory School and Nursery's safeguarding policies and procedures.
- To ensure all staff will receive appropriate safeguarding and child protection training, including online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The training should be regularly updated, as and when required, but at least annually to provide staff with the relevant skills and knowledge to safeguard children effectively.
- To ensure all staff are aware of their duty to report concerns to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs) or, if appropriate, directly to the appropriate local authority children's social care team.
- Provide clear direction to all staff and others about expected actions in dealing with safeguarding issues in accordance with local authority children's social care procedures.
- To ensure that safeguarding concerns are identified early so that informed prompt action can be taken.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children.
- Identify which children may be particularly vulnerable.
- To ensure staff are able to identify a child who may benefit from early help and to be confident in discussing those needs with the Designated Safeguarding Lead and other agencies.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school, which will be followed by all members of the school community in cases of suspected abuse.
- To make clear our commitment to the development of sound procedures and good practice, including record keeping (CPOMS).

- To prevent people from becoming terrorists, supporting terrorism or other forms of radicalisation.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that parents are aware of our policies and procedures.
- Ensure that listening to children is a cornerstone of our practice.

## 2. Legislation

This policy is based on the expectations laid out by the Independent Schools Inspectorate (ISI) and references the Independent Schools Standards and Regulations (ISSRs). Complaints relating to Early Years Foundation Stage (EYFS) provision can also be directed to Ofsted and by doing so operate on different timelines to the ones outlined in this policy.

Rosemead Preparatory School and Nursery fully recognises its responsibilities for safeguarding and child protection and has followed guidance from the DfE, Lambeth Safeguarding Children Partnership (LSCP) and the Independent Schools Inspectorate (ISI) in producing this policy. This policy applies to Rosemead Preparatory School and Nursery (which includes EYFS, Before and After School Care and Clubs). This policy is reviewed and updated annually (as a minimum) and is available on the school website.

Rosemead Preparatory School and Nursery is committed to safeguarding children and young people and recognises that safeguarding and promoting the welfare of children is everyone's responsibility. We are committed to acting in the best interests of the child at all times and to providing a safe and secure environment for all children in its care. Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interest of the child.

The policy has been developed in line with:

- Keeping Children Safe in Education (September 2024) ("KCSIE")
- Disqualification under the Childcare Act 2006 (September 2018)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice (September 2021) ("SVSH")
- Working Together to Safeguard Children (2023) ("WT")
- Working Together to Improve Attendance (2024)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (Sept 2023)
- The Prevent Duty: Departmental advice for schools and child care providers (August 2015)
- The use of social media for on-line radicalisation (July 2015)
- Counter-Terrorism and Security Act 2015

- Relationships Education, Relationships, and Sex Education (RSE) and Health Education (Sept 2021)
  - Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
  - Equality Act 2010
  - The DDCMS / UKCIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020)
  - The Charity Commission guidance Safeguarding and protecting people for charities and trustees (October 2019)
  - Domestic Abuse Act 2021
  - Voyeurism (Offences) Act 2019
  - The Childcare Regulations 2018
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- Statutory framework for EYFS 2024
  - Behaviour in Schools: advice for headteachers and school staff 2022
  - Filtering and Monitoring Standards March 2023
  - Uk Safer Internet Centre: Appropriate Filtering and Monitoring 2023
  - Cyber Security Standards for schools and colleges.gov.uk March 2023
  - Keeping children safe in out-of-school settings 2023

Staff must be aware of the pivotal role we play in multi-agency safeguarding arrangements. The Governors and Senior Leadership Team will ensure our school contributes to multi-agency working in line with procedures set out by Lambeth Safeguarding Children's partnership and taken account of guidance issued by the Department for Education (DfE), as noted above.

The safeguarding partners (Local Authority-Lambeth, Health, Police and education) will make arrangements to work together with appropriate agencies to safeguard and promote the welfare of children. The Data Protection Act 2018 and GDPR **do not** prevent or limit the sharing of information for the purposes of keeping children safe.

### **3. Roles and responsibilities**

#### **3.1 St Dunstan's Education Group**

The governing body has ultimate responsibility for the management and control of its schools, but delegates day-to-day oversight to the Head of St Dunstan's Education Group (Head of the Group), who turn line manages the Heads of each school, specifically the Head of Rosemead Preparatory School and Nursery, the Head of St Dunstan's Junior School and the Head of St Dunstan's Senior School. This policy reflects that structure.

The governing body has a duty to:

- Have regard to the guidance outlined in Keeping Children Safe in Education 2023, ensuring that policies, procedures and training in the College is effective and complies with law at all times
- Nominate a Designated Safeguarding Governor to take leadership responsibility for the College's safeguarding arrangements
- Ensure an appropriate senior member of staff from the school leadership team is appointed Designated Safeguarding Lead. The designated safeguarding lead should take lead responsibility for



safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. This should be explicit in the role holder's job description.

- Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- Ensure there is an annually updated effective safeguarding policy which is in accordance with government guidance and Lambeth Safeguarding Children's Board safeguarding arrangements put in place with the three safeguarding partners. They must ensure the policy is available via the school website or other means.
- Ensure that all staff undergo safeguarding and child protection training, including online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Ensure the Employee Code of Conduct, Staff Acceptable Use Agreement are kept updated by the School.
- Ensure there are appropriate policies and procedures in place to respond to children who have unexplainable and/or persistent absences from education including having at least two emergency contacts for each child.
- Ensure that they are doing all they reasonably can to limit children's exposure to harmful content online. As part of this process they should ensure the school has appropriate filtering and monitoring systems in place and regularly review their effectiveness
- are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information

The governor who oversees Safeguarding and Child Protection is Jonathan Roanan.

### **3.2 The Head of Rosemead**

The Head of Rosemead is responsible for Safeguarding and Child Protection. They must:

- Ensure that mechanisms are in place to assist members of staff understand and discharge their role and responsibilities.
- Ensure that all staff are aware of the procedures to follow if they are concerned about the behaviour of a colleague- any concerns they have about another member of staff is taken to the Head not the DSL.
- Liaise with the Designated Officer (LADO), and deal directly with the teacher against whom the allegation has been made, in cases where an allegation has been brought against a member of staff.
- Put in place procedures for handling cases of suspected abuse (including allegations against staff and volunteers) which are consistent with those agreed by (LSCP) and easily available for all staff and volunteers for reference.
- Liaise with the nominated governor on child safeguarding issues and comply with school policy.
- Undertake the role of Deputy Designated Safeguarding Lead (DDSL) and appoint another member of staff to undertake the role of Designated Safeguarding Lead (DSL).
- Ensure that all members of staff are aware of who the DSL and DDSLs are and what their role entails.

- Ensure that the DSL and DDSLs receive appropriate Level 3 training, refresher training at least every 2 years and support as and when required.
- Understand the role of the DSL and DDSLs
- Ensure that all staff know and are alert to signs of possible abuse and know what to do if they have any concerns or suspicions.
- Ensure that parents see copies of the Safeguarding policy in order to alert them to the fact that they may need to make referrals. Raising parents' awareness may avoid later conflict if the school does have to take appropriate action to safeguard a child.
  - Make parents aware of the school's Safeguarding policy via the school's website.
  - Work with local partners such as LSCP and Children's Social Care Department to create a safe environment for children at the school.

### 3.3 Detail all other key role holders and their duties

The Designated Safeguarding Lead (DSL) is responsible for Safeguarding and Child Protection. As stated in Keeping Children Safe in Education 2024, the **DSL is expected to:**

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them
- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- refer cases where a crime may have been committed to the Police as required
- act as a point of contact with the three safeguarding partners in line with Working Together to Safeguard Children
- liaise with the Head to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff and leadership in matters of safety and safeguarding (including online and digital safety), including promoting educational outcomes by sharing information about safeguarding, welfare and child protection issues
- Act as a source of support, advice and expertise for all staff, raising awareness of safeguarding and child protection amongst staff and parents
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff

- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation including that these allow information to be shared, without consent if necessary, for the purpose of keeping children safe
- Understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners.
- Be able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- Understand and support the school or college with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation
  - Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- Ensure appropriate monitoring and filtering systems are in place on school devices and school networks and ensure this is reviewed at least annually.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses
- Ensure the school's child protection policies are known, understood and used appropriately
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Ensure children leaving the School have their child protection file securely transferred to the new school or college as soon as possible ( within 5 days of them starting at their new setting) as well as any other appropriate information necessary to safeguard the child in their new setting
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- Be available during school hours to discuss safeguarding concerns with staff and make adequate and appropriate cover arrangements for out of hours/out of term
- Act as the designated teacher along with the DDSLs for children who have a social worker (Looked After Children)
- Monitor attendance data and communicate any concerns with parents. Offer support to families as and when required.

As stated in Keeping Children Safe in Education 2024, whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead. With this in mind, the **Deputy DSLs** are expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a crime may have been committed to the Police as required
- Act as a point of contact with the three safeguarding partners
- Liaise with the DSL to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies, in consultation with the DSL
  - Act as a source of support, advice and expertise for all staff
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively in the DSL's absence
- Contribute towards staff safeguarding training as required by the DSL
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation including that these allow information to be shared, without consent if necessary, for the purpose of keeping children safe
- Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- Assist the DSL in ensuring the school's or college's child protection policies are known, understood and used appropriately
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- Be available during school hours to discuss safeguarding concerns with staff
- Liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

### **3.4 Staff**

Staff are responsible for Safeguarding and Child Protection. Staff will:

- Adhere to and follow the the Safeguarding and Child Protection Policy and Procedures at all times
- Ensure any safeguarding concerns are raised as a priority. Any concerns must be logged on CPOMs in a timely manner and when necessary communicated verbally to the DSL. Any disclosures will be reported immediately to the DSL or DDSL.

### **3.5 Pupils and parents/carers**

Parents/carers are responsible for Safeguarding and Child Protection. Parents /carers will:

- Ensure they protect their child's physical and mental health and development (offline and online) from maltreatment and harm
- Ensure they inform the school office of their child's absence before 10.00am in line with our Attendance Policy

Pupils will:

- Be informed regularly that they can talk to the DSL, DDSL or member of staff about any concerns they may have regarding their own or another's safety
- Be provided with a rigorous PSHE, Online Safety, Relationships & Health and wellbeing curriculum to ensure they know how to keep safe and happy.

## **4. Policy content**

### **4.1 Definitions**

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental or physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education 2024. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA (Health)
- The chief officer of police for a police area in the LA area

## **4.2 Equality Statement**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are LGBT. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT (or are perceived to be) can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. We endeavour to reduce the additional barriers faced by providing a safe space for them to speak to having a staff and a student Counsellor as part of School's commitment.

## **4.3 Multi Agency Working**

The school has a pivotal role to play in multi-agency safeguarding arrangements. We will ensure that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'. three local safeguarding partners will make arrangements to work together, and with us, to safeguard and promote the welfare of our children, including identifying and responding to their needs. The DSL, Head and Governing Body are aware of our local arrangements.

## **4.4 Identifying and recognising Abuse , Neglect and Exploitation (particularly in vulnerable children)**

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

can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Abuse can be:

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

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

The safety of pupils at Rosemead Preparatory School and Nursery is paramount. We take a zero-tolerance approach to any form of abuse and take steps to help staff understand that abuse can be present in any institution at any time. All staff should be aware of the types and indicators of abuse so that they can identify children who may be in need of help. Known or suspected abuse will be handled sensitively but immediately and with due care. The School trains staff in how to identify signs of abuse as well as ensuring awareness of historical abuse indicated by a child.

Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

The School understands the importance of **contextual safeguarding** and ensures the safeguarding team considers community risks and issues that may impact on the safety and vulnerability of children in its care as well as wider environmental factors in a child's life that may be a threat to their safety and/or welfare. The forms of abuse listed below may occur in both intra and extra-familial contexts.

All staff at Rosemead Preparatory School and Nursery are 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. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy and making a report on CPOMs.

Abuse takes many forms, and children experiencing abuse or harm don't necessarily behave in set ways. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.. However, abused children may display some of the following behaviours.

- Withdrawn
- Suddenly behaves differently
- Anxious

- Clingy
- Depressed
- Aggressive
- Problems sleeping
- Eating disorders
- Wets the bed
- Soils clothes
- Misses school
- Changes in eating habits
- Obsessive behaviour
- Nightmares
- Drug misuse
- Alcohol misuse
- Self-harm
- Thoughts about suicide
- Risky sexual behaviour

The information below comes from the NSPCC website: [nspcc.org.uk](https://www.nspcc.org.uk).

## **PHYSICAL ABUSE**

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes violent acts such as hitting with hands or objects, slapping, kicking, shaking, poisoning, burning and drowning. It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

### **Signs of physical abuse**

Physical abuse can be indicated by:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks.
- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning.

## **EMOTIONAL ABUSE**

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own. Emotional abuse can include humiliating, ignoring, threatening or shouting at a child. It can also



involve trying to control their lives, not allowing them to have friends or never saying anything kind, expressing positive feelings or congratulating a child on successes.

### **Signs of emotional abuse**

There might not be any obvious physical signs of emotional abuse or neglect. As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age.

Young children might:

- be overly-affectionate to strangers or people they don't know well
- seem unconfident, wary or anxious
- not have a close relationship or bond with their parent
- be aggressive or cruel towards other children or animals.

Older children might:

- use language you wouldn't expect them to know for their age
- act in a way or know about things you wouldn't expect them to know for their age
- struggle to control their emotions
- have extreme outbursts
- seem isolated from their parents
- lack social skills
- have few or no friends.

### **SEXUAL ABUSE**

When a child or young person is sexually abused, they're forced or tricked into sexual activities. Sexual abuse can happen anywhere – and it can happen in person or online.

There are two types of sexual abuse – contact and non-contact abuse.

Contact abuse is where an abuser makes physical contact with a child. This includes:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities including touching, kissing and non-penetrative sexual acts
- making a child undress or touch someone else.

Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- exposing a child to sexual acts whether in person or online (including showing pornography)
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone.

## **NEGLECT**

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

There are 4 types of neglect.

**Physical neglect** is failing to meet a child's basic needs, such as food, clothing or shelter, and/or failing to ensure a child is properly supervised or kept safe.

**Educational neglect** is failing to ensure a child is given an education.

**Emotional neglect** is failing to give a child the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.

**Medical neglect** is failing to provide proper health care. This includes dental care and refusing or ignoring medical recommendations.

### **Signs of neglect**

Children who are being neglected may show the following:

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes or inappropriate clothing for the weather
- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness, infections or skin issues
- repeated accidental injuries, often caused by lack of supervision
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues.

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members.
- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- have unexplainable and/or persistent absences from education
- showing signs of self-harm
- using drugs or alcohol

## **DOMESTIC ABUSE**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological; physical; sexual; financial; and emotional.

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

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

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

victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8am to 1pm Monday to Friday) for advice in respect of children who have experienced domestic abuse

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC-UK domestic abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse

## **CHILDREN WITH SEND**

Rosemead Preparatory School and Nursery recognises that children with SEND are particularly vulnerable due to additional barriers to recognising abuse. These could include assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration or communication barriers to disclosing abuse. We work together with the SENDCO and Enrichment Team to identify signs of abuse or neglect and provide appropriate support for such children.

The School recognises that children with a social worker are more at risk than other children. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

Where there has been abuse, the School will take actions to learn lessons.

Further information can be found in:

- SEND Code of Practice 0 to 25 years
- Supporting Pupils at School with Medical Conditions

and from specialist organisations such as:

- The Special Educational Needs and Disabilities information and support Services (SENDIASS)
- Mencap

- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

## **HOMELESSNESS**

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

## **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). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that Lambeth Council 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 we become aware of a child in a private fostering arrangement within Lambeth, we will notify the Lambeth Integrated Referral Hub by emailing [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk) or calling **0207 926 3100**.

### **4.5. Child on Child abuse Including sexual Violence and Sexual Harrasment**

Child on child abuse includes but is not limited to:

- Bullying including cyber-bullying
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault (including grabbing other children's body parts without their consent).
- Sexual harassment such as sexual comments, remarks, jokes, flicking bras or otherwise interfering with clothes, brushing against someone and online sexual harassment such as coercion, sharing of unwanted explicit content and sexual messages online.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Sharing nudes and semi-nudes

- Initiation/hazing type violence and rituals.

Behaviour which is not abusive at first may become abusive quickly or over time. Statistically girls and young women are more likely to be abused by their peers and boys and young men are more likely to be identified as abusers. This can be driven by wider societal factors such as everyday sexist stereotypes. Pupils with SEND, certain health conditions or pupils with certain characteristics such as sexual orientation, ethnicity, race or religious beliefs can also be at higher risk of suffering child on child abuse including peer group isolation and prejudice-based bullying. Pupils with SEND may also be disproportionately impacted by bullying without showing signs and may face barriers to reporting these challenges. The SENDCO or a member of the Enrichment Team will be involved when there is a child-on-child abuse concern about a child on the SEND register. Despite this, we recognise that pupils of any age or sex are potentially at risk from child-on-child abuse and therefore all adults working for the School must take allegations of child-on-child abuse seriously and be vigilant in reporting such abuse in accordance with the procedures below.

Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. Child on child abuse must always be recognised as a form of abuse and should never be dismissed as banter or an inevitable part of growing up. It can have a lifelong impact and so must be dealt with seriously.

The School recognises that children's sexual behaviour exists on a continuum from developmentally expected, to inappropriate, problematic or violent. Harmful sexual behaviour (HSB) can occur online or face-to-face and will usually be automatically considered harmful if there is a power differential between the two children such as an age gap of over two years or a developmental difference. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support

The School aims to prevent child on child abuse by dealing with the risks proactively, not just reactively. All pupils are spoken to in assembly by the DSL or DDSL, with further work undertaken by Class Teachers so that they understand the different forms of child-on-child abuse and how to report it in school. An annual specialist workshop on online behaviour and online safety (which includes advice and information on all aspects of child-on-child abuse) is provided by an external specialist to pupils, staff and parents. School staff address relationships and appropriate behaviour through their PSED and PSHE (including RSE). This includes education on the 4Cs: Content, Contact, Conduct and Commerce.

Positive values, including equality and respect for diversity are promoted through our Roots of Rosemead and PSHE programmes in order to minimise the risks of child-on-child abuse for vulnerable groups. Gender roles, stereotyping, prejudice, healthy relationships are among other relevant topics covered in these programmes.

The School focuses on providing a safe atmosphere and culture in which pupils feel able to share their concerns openly and have them listened to. Derogatory or sexualised language or behaviour is not acceptable and will be challenged. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The School recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place both inside and outside of school and is simply not being reported. All staff working with children are advised to maintain an attitude of **‘it could happen here’**.

#### **4.6 Honour Based Abuse including FGM and Forced Marriage**

Honour based abuse is the internationally recognised term describing cultural justifications for violence and abuse. The Association of Chief Police Officers (ACPO) defines honour-based abuse as ‘A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community’. This may include Female Genital Mutilation, Forced Marriage and/or practices such as breast ironing.

Honour based abuse is a domestic abuse issue, a child abuse concern and a crime. If any child is suspected to have been a victim of, or at risk of harm from honour-based abuse, the DSL must be notified immediately, and this information will be passed on to the appropriate Safeguarding Children Board for the child in question.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

#### **FEMALE GENITAL MUTILATION (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. The disclosure of FGM should be reported directly to the police as well as to the DSL. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.

- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo a medical examination.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society o mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Many girls suffer health problems for the rest of their lives after the operation, including but not limited to urinary, menstrual, stomach and mental health problems.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care. Call the 24 hour NSPCC FGM helpline 0800 028 3550 if you are worried a child is at risk of FGM.

There is a mandatory reporting duty that requires any teacher, who is informed by a girl under 18 that an act of FGM has been carried out on her, to make a report to the police by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, teachers should report the case immediately to police, including dialling 999 if appropriate. Mandatory Reporting of FGM

If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School's local safeguarding procedures. Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13. Multi-agency FGM guidance

In most cases reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

## **FORCED MARRIAGE**

A forced marriage is a marriage in which one or both spouses do not consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.



There is a clear distinction between an arranged marriage and a forced marriage. An arranged marriage is entered into freely by both parties, although their families take a leading role in the choice of the partner. Forced marriage is a form of abuse and should be treated as such. Any child at risk of being entered into a forced marriage should be reported to the DSL, and this information will be passed along to the appropriate local authority children's social care service for that particular child.

## **MODERN SLAVERY**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (May 2022)" [Gov Modern Slavery](#)

### **4.7 Child Sexual Exploitation (CSE)**

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017) [CSE DfE Guide](#)

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.

#### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and unexplainable/persistent absences from education or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

#### **Potential vulnerabilities include:**

- Having a prior experience of neglect, physical and/or sexual abuse;
  - Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
  - Absence of a safe environment to explore sexuality;
  - Economic vulnerability;
  - Homelessness or insecure accommodation status;
  - Connections with other children and young people who are being sexually exploited;
  - Family members or other connections involved in adult sex work;
  - Having a physical or learning disability;
  - Being in care (particularly those in residential care and those with interrupted care histories); and
  - Sexual identity.

The suspicion / disclosure of potential CSE should be reported to the DSL (or to local authority children's social care).

#### **4.8 Child Criminal Exploitation(CCE)**

CCE occurs 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.

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; and
- children who regularly miss school or education or do not take part in education.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".<sup>9</sup> Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

If a child is suspected or discovered to be involved in any sort of gang activity, the DSL should be alerted, and the appropriate Safeguarding Children Board for the particular child will be informed.

Guidance can be sought from, multi-agency practice principles for responding to child exploitation and extra-familial harm- *Tackling Child harm Support Programme 2023*

#### **4.9 Prevent and Risk of Radicalisation**

The Foundation is committed to upholding its legal responsibility under the CounterTerrorism and Security Act (July 2015) to ‘have a due regard, in the exercise of our functions, to prevent people from being drawn into terrorism.’ Staff must be aware of the risks posed by online activity of extremist and terrorist groups and their responsibility to identify individual children who may be at risk of the revised Prevent document). [Revised Prevent Duty Guidance](#)

Prevent is part of the national counter-terrorism strategy and aims to stop people being drawn into or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

The strategy focuses on three key objectives which are:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

##### Susceptibility to Radicalisation

There is no single profile of a radicalised person, nor is there a single pathway or ‘conveyor belt’ to being radicalised. There are many factors which can, either alone or combined, lead someone to subscribe to terrorist or terrorism supporting ideology. These factors often include exposure to radicalising influences, real and perceived grievances – often created or exacerbated through grievance narratives espoused by extremists – and a person’s own susceptibility.

A person’s susceptibility to radicalisation may be linked to their vulnerability. A person can be vulnerable if they need special care, support or protection because of age, disability, risk of abuse or neglect. A person’s vulnerabilities may be relevant to their susceptibility to radicalisation and to the early intervention approach that is required to divert them away from radicalisation.

In other cases, vulnerabilities may not be present or relevant to the early intervention approach required. Not all people susceptible to radicalisation will be vulnerable, and there are other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.

Possible signs of radicalisation may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures

- making remarks or comments about being at extremist events or rallies outside school
  - evidence of possessing illegal or extremist literature
  - advocating messages similar to illegal organisations or other extremist groups
  - out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
  - secretive behaviour
  - online searches or sharing extremist messages or social profiles
  - intolerance of difference, including faith, culture, gender, race or sexuality
  - graffiti, art work or writing that displays extremist themes
  - attempts to impose extremist views or practices on others
  - verbalising anti-Western or anti-British views
- expressing views on established terrorist narratives such as antisemitism, misogyny, antiestablishment, anti-LGBT grievances and religious or ethnic superiority.
- advocating violence towards others

Prevent sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

Rosemead Preparatory School and Nursery has internet filtering in place to protect children from exposure to extremist material on the internet. These filtering and monitoring systems are regularly reviewed for their effectiveness.

Promotion of fundamental British values and our own School values is incorporated into the curriculum, particularly in PSHE lessons which provide a safe environment to debate controversial issues and help build pupils' resilience to issues such as radicalisation. This supports pupils to make a positive contribution to the development of a fair, just and civil society.

One of the aims of Prevent is to intervene early to stop people from becoming terrorists or supporting terrorism. This means providing bespoke interventions for people who are susceptible to radicalisation.

Prevent referrals are likely to be made in the first instance by people who come into contact with those who appear to be at risk of being radicalised. There is no single model of a person's radicalisation journey or single profile of a radicalised person. Frontline professionals, when deciding whether to make a referral, should consider whether they believe the person they are concerned about may be on a pathway that could lead to terrorism.

The suspicion / disclosure of potential involvement in terrorism or the identification of anybody who is susceptible or vulnerable should be reported to the DSL (or directly to the Lambeth Prevent Programme at 020 7926 3668 or [prevent@lambeth.gov.uk](mailto:prevent@lambeth.gov.uk) who will advise on referrals to Channel if required). You can also speak to local police in person/via 101 or call the DfE helpline on 020 7340 7264/via [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Staff should use their judgement to identify children at risk and act proportionately.

The DfE have published supporting advice for schools and further education settings on 'Managing the risk of radicalisation' in their education setting

## **VISITORS**

Appropriate arrangements need to be in place for the supervision of external visitors or speakers who will be coming into contact with pupils. Visitors to Rosemead Preparatory School and Nursery will be issued with safeguarding guidance (Safeguarding Brochure) as a matter of routine. Every visitor will be signed in and expected to wear their visitors badge for the duration of their visit.

It is the responsibility of all staff to ensure that no visitor has unsupervised access to pupils at any time and to monitor the content of any presentation. Pupils are not allowed to invite guests on site and all invitations must be overseen by a member of the teaching staff.

As part of their general safeguarding responsibilities and the Prevent duty, staff should complete a Visitor Risk Assessment which details how visiting speakers are vetted for links with extremism. (e.g. content of presentation discussed, official website of a company checked) All visitor risk assessments will be signed off by a member of the SLT. Photo ID will be requested to be seen by unknown visitors to the school that have been invited to school to present or speak with the children. The name on the ID should be the same name as the expected visitor.

The School's protocols for ensuring that any visiting contractors are suitable and appropriately supervised is:

- To ensure the visiting contractor is always accompanied when on site
- Prior to attending authenticity checks will be made

### **4.10 Children who go Missing from Education (CME) and Children who are Absent from Education**

Children who go missing from education, particularly persistent/unexplainable absences, or children being absent from education for prolonged periods and/or on repeat occasions can be a vital warning sign to a range of safeguarding issues, including neglect, and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the School's response to persistently absent pupils and children missing in education supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to social care, where being absent from education may increase known safeguarding risks within the family or community.

The School's procedures for unauthorised absence are explained in the Attendance Policy. Where reasonably possible, the School requests that all parents/guardians provide at least two emergency contact numbers for each pupil and encourages parents/guardians to inform the School of any changes as soon as possible. This provides the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern. The School monitors the attendance of pupils through the daily register and addresses irregular attendance. We will report to Lambeth Local Authority a pupil who fails to attend

school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

The College will liaise with Lambeth local authority when the whereabouts of a child is unclear or unknown and agree joint next steps, in accordance with the guidance in Children Missing Education (September 2016). [CME](#) This includes routine notification for children leaving the School for example due to relocation, change to home education or permanent exclusion.

If a child is found to be missing during the school day the following procedure should be followed:

- Inform the DSL and Prep or Pre-Prep Office.
- Checks will be undertaken to try and ascertain whether the pupil is on site. Locations to be considered include: Medical Bays, Music rooms, Halls, Toilets, Playgrounds, Libraries and Art Room.
- If the pupil still cannot be located, DSL will agree action to be taken with the Head. (e.g. Telephone call to parents and police)

#### **4.11 Elective Home Educated (EHE)**

Many home educated children have an overwhelmingly positive learning experience. We expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll. Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

#### **4.12 Early Years Foundation Stage (EYFS)**

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

Staff are not permitted to use personal mobile phones to take photographs or videos of any children in the Early Years Foundation Stage. All staff working in EYFS, visiting EYFS or working with EYFS must read and understand the Early Years Policy. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.

Full details of EYFS supervision arrangements and ratios can be found in related document Supervision of EYFS Pupils Policy.

Disqualification from working in childcare Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take

steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Safer Recruitment Policy.

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

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

#### **4.13 Looked After Children (LAC)**

Rosemead Preparatory School and Nursery will ensure that a designated member of staff (Kate Tyrrell-SENDSCO) has responsibility for the welfare and progress of any pupil on roll who is looked after by a local authority, and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers. The School is aware of the particular vulnerability of these children.

Any children in private fostering arrangements are also a potentially vulnerable group and the School will adhere to its mandatory duty and report any incidences of private fostering to local authority children's social care. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

#### **4.14 Disclosures and Reporting Procedures -What to do if you have a Concern**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not

assume that somebody else will take action and share information that might be critical in keeping children safe.

Members of staff may suspect a case of abuse from a variety of sources:

- A pupil discloses to them personally
- From behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions, burns)
- Indications through schoolwork
- A pupil informs them that he/she knows or suspects that another pupil is being abused
- Another third party informs them that he/she knows or suspects that a pupil is being abused.

Any allegation against other adults including family members will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. It is vital that all children feel listened to and taken seriously. **IF YOU BELIEVE A CHILD IS AT RISK OF IMMEDIATE HARM, YOU MUST CALL 999 BEFORE ANY OTHER ACTION IS TAKEN.**

Safeguarding and Child Protection is everybody's responsibility, including staff, parents and visitors, and pupils and anyone can make a referral to the appropriate Local Safeguarding Children Board if they believe a child is at risk of being harmed.

## **SCHOOL STAFF**

All School staff have a duty to report any Safeguarding or Child Protection concerns without delay. When there is a concern all staff should:

There are a number of avenues of reporting concerns:

- Staff have access to CPOMS, the School's secure online safeguarding reporting system. Wherever possible, CPOMS should be used to log welfare, safeguarding or child protection concerns. These concerns are immediately sent to the DSL, or a nominated deputy in the absence of the DSL, who will act on them in accordance with Lambeth SCB procedures.
- Any supporting documents, such as written notes from pupils should be signed and dated and handed in to the DSL. Body maps are available on CPOMS or from the DSL, these should be used to mark any injuries seen on a child.
- If for some reason a member of staff is unable to report their concern on CPOMS, they should report their concern in writing (either hard copy or email) to the DSL or Deputy DSL without delay.
- If there is no other avenue for reporting available at the time of an incident or disclosure, the staff member may report by phone to the DSL or Deputy DSL, who will make notes which will be shared with the reporting staff member for signing as soon as possible.

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

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place that are well promoted, easily



understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart. The children are introduced to the term Designated Safeguarding Lead (DSL) but to support the understanding for our Pre-Prep pupils we change DSL to- 'Do Share I'll Listen'. Through assemblies, Personal, Social, Health and Emotional (PSHE) and circle time children are taught about the importance of talking about any worries or concerns that they may have.

## **PARENTS AND VISITORS**

Any parent or other visitor to the School has a duty to report any safeguarding or child protection concerns. All visitors to the School are provided with a Safeguarding Brochure, which is also available at the Pre-Prep and Prep Offices. All parents, guardians and other stakeholders will be made aware that there is an official procedure to be followed in any situation where a safeguarding concern is raised, and a copy of this process will be made available if they wish to read it. As outlined in this guidance, any adults with concerns about a child's safety during the course of their visit at St Rosemead Preparatory School and Nursery must:

- Immediately inform the DSL
- Write careful notes about what they have heard, witnessed or have been told. Sign, time and date all notes.

## **PUPIL CONCERNS AND DISCLOSURES**

If a child discloses to you that they are being harmed or abused:

- Reassure the pupil that she/he is right to tell and is not to blame
- Be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- Reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe.
- Ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- Do not promise confidentiality. Explain that you have to make sure that the pupil is safe and may need to ask other adults to help you do this.
- Believe the child. It is important to say 'I believe you and I am going to help you'.
- Remain calm. Do not show shock, anger or disbelief.
- Remain non-judgemental. Do not ascribe feelings to the child, e.g. by saying something like 'you must be angry/sad/hurt'. Simply affirm the child's feelings as they are expressed. 'It's OK to feel that way'.
- Do not ask leading questions. Let the pupil tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.
- Listen carefully and repeat the pupil's words. When the pupil has finished, make sure that she/he feels secure and explain what you are going to do next.

- Follow up by making arrangements with the pupil to speak to them later. They have chosen you as an adult they can trust.
- Report. Make notes, including the date and time of the pupil disclosure on CPOMS. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. It is crucial that your notes be made as soon as possible after the disclosure, and certainly on the same working day. If you are unable to use CPOMS to log your notes, you should write them and time, date and sign them before handing the original hardcopy to the DSL.
- Do not attempt any examination or remove any part of a pupil's clothing to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate doctor.
- Do not investigate. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Children's Services and/or the Police.

## **WHAT HAPPENS NEXT?**

All cases of alleged or suspected abuse will be treated seriously. The DSL will follow the procedures set out in Keeping Children Safe in Education 2024.

Normally, a co-ordination meeting between the DSL and the member of staff who has raised the concern is advised, and all matters disclosed will be treated in strictest confidence. During this meeting, consideration should be given to the provision of support for the child and for the member of staff who made the original report.

Any co-ordination meeting should also consider:

- whether medical treatment or assessment is required
- siblings and other members of the child's family
- implications for other pupils
- the likely attitude of parents/guardians
- immediate welfare of child – e.g., how does he/she get home, fear of going home, etc.

The DSL will complete an assessment using the Lambeth Levels of Need Framework [Levels of Need Framework](#), which will guide the decision of whether or not to refer the child to the local authority children's social care or local safeguarding partners for further action. In situations where a child has suffered or is likely to suffer significant harm, the DSL will seek advice from the local Multi-Agency Safeguarding Hub immediately and refer to children's social care, informing the police as required. If a child has not suffered or is not likely to suffer significant harm but a concern has still been raised, the DSL will seek advice from the local Multi-Agency Safeguarding Hub and refer for an Early Help assessment or to children's social care as appropriate. In all cases, children will also be provided with pastoral support in school which will involve Team around the Child approaches as necessary.

Notes about decisions to refer or not to refer, and reasons for this decision will be made. These notes and minutes from any meetings regarding the child will be kept confidentially on CPOMS, with access available only to the DSL and other members of the Safeguarding Team as appropriate. In some cases further interventions may be necessary and these can lead to inter-agency assessment using local processes which will be overseen by the DSL.

It is best practice to work with parents and seek their consent before referring a child to external agencies. However, there may be cases where seeking consent would cause unnecessary delay or place a child at further risk of harm. In such cases, the DSL may refer the child without parental consent.

In cases of alleged abuse, especially in cases of sexual abuse, children's social care must be informed first, in case the alleged abuser is part of the household and they might put pressure on the child to deny or withdraw the allegation.

The Head must be notified by the DSL before involving parents in conversations about abuse. It is important to be open and honest with parents and they should be informed as soon as possible about any concerns regarding their children. Parents will always be told the source of a referral if it comes from a professional agency, e.g. a school. Members of the public can ask to remain anonymous. An honest approach is always more productive and likely to help a school's future relationship with the parents.

Staff must be careful neither to blame parents nor to dismiss allegations because they believe the parents are considered to be not the sort of people who would abuse their children.

Parental or pupil consent is not required for a referral to statutory agencies where there are concerns about the child's safety; parental consent must not be sought when a child is or may be at risk of harm; we do not require the consent of parents to refer allegations to the LADO.

If you have reported a concern to the DSL, you can and should request follow-up information to find out what actions are being taken to safeguard the child. You should also be aware that you may be asked to support social workers to take decisions about individual children, in line with guidance from Working Together.

The DSL will produce a termly safeguarding report for governors. This report will summarise all reports of safeguarding and child protection concerns and the actions taken in each case. The reports will not include the names of any pupils or staff, unless there is an exceptional reason to do so.

If you have reported your concern directly to a Local Safeguarding Children Board or the LADO, you should also expect a response within 2 days. If you are unsatisfied with the response provided, or if no response has been provided, you should contact the DSL, local authority children's social care or LADO as appropriate to request action. The local authority children's social care each have escalation procedures if you are unsatisfied with the outcome of your concern. You should send your concern to the Head or the local authority children's social care if, after registering your dissatisfaction with the initial result with the DSL, you still feel that more should be done. [Lambeth Escalation Policy](#)

#### **4.15 Safeguarding Allegations Against Staff**

At Rosemead Preparatory School and Nursery we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. A Whistleblowing Policy is available in the School Policies Folder on the School Shared Google Drive. Any allegation against a member of staff or a volunteer will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. Allegations or concerns may come from various sources,

for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is an allegation if the person 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 (also includes behaviour outside the school).

Any Safeguarding and Child Protection allegations involving members of staff or volunteers must be reported immediately to the Head without delay. An allegation against the DSL must be referred immediately to the Head, without informing the DSL. An allegation against the Head must be referred immediately to the Chairman of Governors, Mr Paul Durgan, or in his absence, the Deputy Chairman of Governors, Mr Ian Davenport, who will take independent action. Where an allegation is against the Head, the Head must not be informed of the allegation prior to contact with the Chairman of Governors and LADO. In this instance, the DSL will also not be informed.

The Head or Chair of Governors will follow the procedures set out in Keeping Children Safe in Education 2023. This will involve immediate contact with the Local Authority Designated Officer (LADO) to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these. Discussions may also involve the DSL, legal advisors and Governors. All discussions should be recorded in writing and communication (or not) with both the individual and the parents of the child / children will be agreed in consultation with LADO and any external agencies. If, after discussion between the Head and the LADO, it is considered that the Head should handle the allegation, then he will undertake the appropriate action promptly, and normally within 24 hours. Any decision about suspension will be taken after careful consideration with due weight given to the views of the LADO.

The Head has to decide whether any concern is an allegation or low-level concern. 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 for referral to the Local Authority Designated Officer (LADO).

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. If the concern has been raised via a third party, the head should collect as much evidence as possible by speaking directly to the person who raised the concern, to the individual involved and to any witnesses. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 5 years or until the individual has left employment, whichever is longer.

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

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult the LADO and take a more collaborative decision-making approach.

(See Low Level Concerns Policy for further detail)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018 and be kept at least until the individual leaves the School's employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO. The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

The Head will make every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence, or the DfE (Department for Education) and/or the TRA (Teaching Regulation Agency) publish information about an investigation or decision in a disciplinary case.

The Head will ensure that the School reports to the DBS (Disclosure and Barring Service) any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used for regulated activity and who have caused harm or posed a risk of harm to a child. In this context, ceasing to use a person's services includes: dismissal; 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; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The School will respond to requests from the DBS for information they hold.

The Head will also consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance to making this decision is published on the TRA website.

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

Parents or guardians of the child concerned must be made fully aware of the allegations. If delay arises in consulting with the LADO, then the DSL or a named deputy should maintain daily contact with the parents. However, the identity of the member of staff involved should not be given until specific legal advice has been obtained.

If the conclusion is that the allegation is completely unfounded, the decision to take the matter no further should be recorded, and the information placed in a confidential file.

When all actions undertaken as a result of the allegation have been completed, then any matters arising from that action will also be overseen by the DSL. The DSL will brief the Head regularly on progress until all matters arising have been concluded.

In the event of enquiries being made by other parents, they should be told only that an allegation of misconduct has been made against a member of staff, and that it is being investigated. No further information should be given without first seeking legal advice.

Any legal advice sought does not and will not override advice received from the LADO.

Where an allegation is made against an individual not employed directly by the School, for example a supply teacher, the School will ensure the allegation is dealt with properly. This may involve working with the LADO, police, and/or children's services and employment agencies to support collection of facts, taking the lead when appropriate, and keeping the agency's human resource manager updated.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children Social Care and the Police.

Organisations or Individuals using school premises

Allegations relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow our safeguarding policies and procedures, including informing the LADO.

#### **4.16 Procedures for dealing with CHILD-ON-CHILD allegations (including child-on-child sexual violence and sexual harassment)**

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

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

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

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they

are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

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

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children when appropriate. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. The School takes the following steps to minimise the risk of child-on-child abuse

The school's procedures to minimise the risk of child-on-child abuse follows the DfE advice to adopt a "whole school" approach, involving all staff, pupils, governors and parents, as part of the school's broad approach to safeguarding. Central to such an approach are (i) staff training so that staff know what to do if they have a concern about a child and (ii) a planned curriculum and co-curricular programme, including assemblies, which takes a preventative approach through the setting of values and standards and the promotion of the fundamental British values, notably in this context, of respect and tolerance. Through the wider curriculum, including Personal, Social and Emotional Development (PSED) in Early Years, Social, Moral, Spiritual and Cultural (SMSC) and Personal, Social and Health Education (PSHE) and Relationships, Sex and Health Education, the school aims to provide pupils with an understanding appropriate to their age and stage of development of issues such as:

- healthy and respectful friendships and relationships
- what respectful behaviour looks like
- consent
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment are always wrong
- addressing cultures of sexual harassment



- appropriate use of social media, emails and all digital platforms

Where an issue of pupil behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, harm’, staff should follow the procedures. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Lambeth Integrated Referral Hub on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of Lambeth Integrated Referral Hub, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Lambeth Integrated Referral Hub and/or the Police as appropriate. The School will have regard to the procedures set out in KCSIE at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority Children’s Social Care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim’s wishes against their duty to protect the victim and other children

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to Children’s Social Care and/or a report to the police against a victim’s wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the Lambeth Integrated Referral Hub, referral process.

The School’s approach to sexting is that all allegations must be reported directly to the DSL/DDSL and staff should be aware that any such abuse may be referred to local agencies when appropriate.

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

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by reassurance that their concern will be taken seriously, they will be supported and kept safe. Support from external agencies will be sought, as appropriate.

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

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

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities). The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

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

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

#### **4.17 Early Help and School Counsellor**

There is a difference between safeguarding children who have suffered or are likely to suffer significant harm and those who may, for whatever reason, be in need of additional support (listening services and early help). The former are reported to Children's Social Care immediately whereas the latter can be helped in a variety of ways.

Pupil concerns will be dealt with in a friendly and supportive manner so that each pupil will develop the understanding that staff can be trusted to help in any situation. Rosemead Preparatory School and Nursery provides a secure environment for the pupils to talk to or consult with adults who can give help if and when it is required, or who will arrange appropriate assistance for the child using external, professional agencies.

The School has arrangements for listening to children and providing early help. Any children of concern are raised and discussed at all staff meetings and during EYFS Supervisions. If early help is appropriate, the DSL (or deputies) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate, Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment, if the child's situation does not appear to be improving.

Staff are trained to recognise variations in pupil behaviour that may indicate emotional or physical concerns and guidance and support is given to pupils who may be experiencing difficulties of a sensitive nature either within school or at home, by developing appropriate and effective strategies.

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

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

- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the school day.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL.

All staff provide pastoral support for pupils. Additional, confidential support is provided by the School's Counsellor. Children may be referred to the Counsellor by a member of the Leadership team and parents will be asked for permission for their child to access this service. Any children staff feel would benefit from the Counsellor should speak to a DSL or DDSL.

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.

#### **4.18 Mental Health**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance [DfE Mental Health](#). Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

Systems and processes for identifying possible mental health problems:

- Any children with potential mental health problems are raised at weekly staff meetings under 'Children of Concern' section. This is to flag these children to all staff and it enables monitoring to take place
- Staff should record any mental health concerns on CPOMS' which will be assigned to the DSL and Mental Health Lead (DDSL-Lesley Kastoryano). They will decide on the next course of action if needed
- The DSL and Mental Health Lead will support staff to liaise and refer if appropriate to other agencies who support the pupil such as Social Services, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service Children and young people's mental health services (CYPMHS)
- The school understands that it has an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

#### **4.19 Relationships and Sex Education**

Relationships and Sex Education is taught via PSHE. The School understands that preventative education is most effective in the context of a whole school approach that prepares children for life

in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. The School will have regard to the DfE's statutory guidance Relationships and Sex and Health Education when making arrangements for and teaching Relationships and Sex Education. Relationships Education will form part of the school's PSHE programme.

We also recognise the need to be alert to the risks posed by strangers or others who may wish to harm children in school, or when travelling to and from school, and we will take all reasonable steps to lessen such risks through talks for children.

#### **4.20 Safeguarding Continual Professional Development**

All governors and all staff are supplied with the summary statutory guidance from Keeping Children Safe in Education 2024 and a central record is kept that this information has been received, read and understood.

All governors, staff and volunteers are supplied with copies of the safeguarding and child protection policy, undergo mandatory annual safeguarding training in accordance with Lambeth SCB procedures and receive regular reminders and bulletins about the procedures in place to ensure that they can assure themselves that the safeguarding policies and procedures in place in schools are effective. This training is regularly updated. A formal record is kept on the issuing of guidelines and individual training received.

Annual safeguarding training includes:

- The safeguarding and child protection policy, including the Prevent duty
- The expected pupil behaviour policy and behaviour management procedures
- The staff code of conduct
- Staff acceptable use policy and guidance
- The whistleblowing policy
- Part 1 and, for all leaders and those working directly with children, Annex B of KCSIE and Part 5.

The DSL, Deputy DSLs and other members of the safeguarding team undertake full refresher training at least every two years and the DSL attends regular network meetings as well as keeping up to date with weekly and monthly local and national safeguarding bulletins. The DSL should undertake Prevent awareness training.

Through the regular training programme outlined above, the School ensures that a culture of continued learning and development relating to safeguarding is promoted, with staff given ongoing opportunities to ask questions, raise concerns and review their own practice.

#### **4.21 Safer Recruitment**

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

opportunities, within the School. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. Shortlisted candidates will be advised that online searches may be done as part of due diligence checks

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

All new members of staff receive safeguarding induction as soon as possible after start date, and certainly before they have unsupervised access to children. Induction training also includes training on the Staff Code of Conduct, Safeguarding and Child Protection Policy, Expected Pupil Behaviour Policy and the identity and the role of the DSL.

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

#### 4.22 Online Safety

The school will adhere to the Online Safety Policy at all times. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Pupils, staff and parents receive annual education on the most up to date online safety risks from an external expert.

We have an effective whole school approach to online safety which empowers us to protect and educate pupils, staff and parents, when appropriate in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other

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

•**commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams

Considering content, contact, conduct, commerce will provide the basis of an effective online policy.

Appropriate filtering and monitoring systems on school devices and networks are in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commercial risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. Further details of the School's policy and procedures in relation to online safety can be found in the School's Online Policy. These systems will be reviewed periodically.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

## Cybercrime

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

Cyber-dependent crimes include:

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing

of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

### **Filtering and Monitoring**

The school will follow the DfE's filtering and monitoring standards:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

A termly check will be carried out by the Head of IT to ensure our filtering systems are working effectively.

A filtering and monitoring log will be kept whenever there is a breach by a pupil which will detail blocked activity and the action taken.

### **4.23 Staff Code of Conduct**

Staff have the responsibility to behave appropriately and report concerns regarding colleagues in accordance with the Safeguarding and Child Protection Policy and Whistleblowing Policy.

Further information on expected staff behaviour is found in the Staff Code of Conduct. Staff should read and sign annually to confirm they will adhere to the Staff Code of Conduct.

All staff working in EYFS, visiting EYFS or working with EYFS must read and understand the EYFS Mobile Phones Policy. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.

### **4.24 Use of Cameras, Computers, Mobile phones (including specific reference to the EYFS setting) and Social Media**

The use of ICT has grown considerably over the last few years and staff use ICT daily to support and enhance children's learning and development. Technology is also an integral part of teaching throughout EYFS and KS1 and KS2, with children in KS1 and KS2 receiving timetabled sessions of Computing.

When their children join Rosemead Preparatory School and Nursery Preparatory School and Nursery, all parents sign an internet use agreement. From Year 3 all children also sign the agreement. Parental permission is also sought for the taking of photographs or videos. This information is held on the school's management system and any photo/video restrictions are shared with staff. All computer equipment and internet access within our school are subject to appropriate controls and internet safety rules. Use of any ICT equipment is closely supervised, and we expect this level of supervision to be



applied in the home. All safety controls within school are permanently in place. Staff are expected not to use any computer for personal reasons during school hours, unless this is essential, and then, only during their non-contact time, and when children are not present.

Staff use of personal mobile phones and other personal mobile devices is restricted to the staff rooms and school office areas. They must not be used in the classrooms, corridors or any common areas that children have access to, unless the Head has given one-off permission because of an extenuating circumstance. However, out of school hours and during periods when classes are not in their classroom the rooms will be considered to be staff office areas. When off-site staff are permitted to use their personal mobile phone for school related business. The taking of photographs of children is only permitted when using school portable devices. For the avoidance of any doubt, the taking of photographs of the children, both on and off school premises, using personal mobile devices is strictly prohibited. Refer to the Use of Images policy for further information.

If staff, including external club providers and visiting peripatetic teachers contribute to internet blogs or access social networking sites such as Facebook, Twitter, LinkedIn or Instagram they must not mention Rosemead Preparatory School and Nursery in a negative way. They must not post content, including photographs and videos which could be deemed inappropriate and potentially bring about reputational damage to the School. Staff are also advised not to communicate with parents or children via social networking sites, as they may inadvertently place themselves in compromising situations, which may cause themselves embarrassment or bring the school's name into disrepute. It is recommended as part of safer recruitment that prospective members of staff have their social media accounts scrutinised. In addition, current staff social media accounts may be periodically monitored to ensure they comply with this policy.

#### **4.25 Co-Curricular Clubs and Activities**

Co-curricular activities and clubs hosted by external bodies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral, if necessary. All new external club staff are required to undertake Safeguarding training with one of our DSL/DDSL's before working with any children.

#### **4.26 Use of School Premises for Non-School Activities**

Where the Governing body hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or co-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Governing body, under the direct supervision or management of their school staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body the Governing body 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 the school on these matters where appropriate. The Governing body 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. The guidance on Keeping children safe in out-of-school settings details safeguarding arrangements that schools should expect these providers to have in place.

#### **4.27 Alternative Provision**

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- Alternative Provision DFE statutory guidance, and
- Education for children with health needs who cannot attend school - GOV.UK ([www.gov.uk](http://www.gov.uk)) – DFE statutory guidance.

#### **4.28 What Staff Should Do if they have Concerns about Safeguarding Practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Whistleblowing Policy given annually alongside The Staff Code of Conduct. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

### **5. Monitoring**

This policy will be reviewed by the Designated Safeguarding Lead annually.

At every review, the policy will be approved by the full governing board.

The Safeguarding Governor will meet with the School's DSL and DDSLs to review safeguarding practice and procedures.

Weekly Senior Leadership Meetings will have Safeguarding as an agenda item to review safeguarding practice and procedures as appropriate.

The DSL and DDSLs will meet weekly to discuss:

- Any safeguarding concerns
- CPOMs-including actions/closing of incidents
- Safeguarding Logs
- Attendance data
- Training required

The DSL Team will provide regular safeguarding updates or scenarios for staff to respond to so that the safeguarding culture remains rigorous amongst all members of staff regardless of role. This should also aid staff confidence around safeguarding policy and procedure.

An annual audit of safeguarding records will be completed by the DSL.

This policy and its implementation will be reviewed by the governors annually. The governors should consider whether the procedures are satisfactory and being properly enacted. The implementation of the policy will be checked, monitored, reviewed and evaluated. The governors' overview will consider any trends and patterns identified during the year. Their conclusions should be clearly minuted.

## **6. Links with other policies**

*This Safeguarding and Child Protection policy links to the following policies:*

- *Behaviour*
- *Staff Code of Conduct*
- *Whistleblowing*
- *Anti-bullying*
- *Health & Safety*
- *Attendance*
- *Curriculum*
- *PSHE (including RSE)*
- *Prevent*
- *Online Safety*
- *Mobile phone, Camera and Device Acceptable Use*
- *Risk Assessment*
- *Safer Recruitment*
- *Educational Visits*
- *Low Level Concerns Policy*
- *Equal Opportunities*