DULWICH COLLEGE
FOUNDED 1619

SAFEGUARDING (CHILD PROTECTION) POLICY

This policy has due regard for, and been updated in accordance with, *Keeping children safe in education 2025 – Statutory guidance for schools and colleges*.

CONTENTS

1 Key contact details

2 Foreword

3 Purpose of the policy

4 Commitment to safeguarding

5 The College's key safeguarding roles

6 What to do if you are worried about a child

7 What to do if you have a safeguarding concern or an allegation about a member of staff (including supply staff, volunteers or contractors)

8 Escalation / whistleblowing

9 Information sharing and records

10 Educating and supporting pupils, including online safety

11 Staff training

12 Safer recruitment

13 Support for staff and volunteers

APPENDICES: SUPPORTING PROCEDURES AND GUIDANCE

1 Principles

2 Equality and diversity – anti-discriminatory practice

3 Legislation, guidance and policies

4 Signs and symptoms of child abuse

5 Sexual violence and sexual harassment between children

6 Safeguarding concerns and allegations made about staff, including supply staff, volunteers and contractors

Section 1: Allegations that may meet the harm threshold

Section 2: Low-level concerns

7 Other safeguarding issues

8 Handling concerns and disclosures

9 Making a referral

10 Management of specific safeguarding scenarios

11 The role of the Designated Safeguarding Lead, the Board of Governors, and the Safeguarding Governor

Action to take

All College staff should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare (including concerns regarding possible child-on-child abuse), or identify a child in need, they must report the matter immediately to the Deputy Master Pastoral & Co-Curricular (the College's Designated Safeguarding Lead) or one of the College's Deputy Designated Safeguarding Leads: see Key College Safeguarding Contact Details at the start of this policy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and, if appropriate, the police) is made immediately.

1. KEY CONTACT DETAILS

KEY COLLEGE SAFEGUARDING CONTACT DETAILS

DESIGNATED SAFEGUARDING LEAD FOR THE WHOLE COLLEGE (DSL)

Elliot Read (Deputy Master Pastoral & Co-Curricular, Online Safety Office and Senior Attendance Champion)	020 8299 5188 (Ext 333/334) readej@dulwich.org.uk or safeguarding@dulwich.org.uk	Office on the ground floor of the South Block

DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSLs)

Whole College		
Nina Firkin (Safeguarding Manager)	020 8299 5188 (Ext 333) firkinNF@dulwich.org.uk or safeguarding@dulwich.org.uk	Office on the ground floor of the South Block
Upper School		
Colm Ó'Siochrú (Head of Upper School)	020 8299 9281 osiochrucg@dulwich.org.uk	Office on the ground floor of the Lord George Building
Middle School		
Sameer Tanna (Head of Middle School)	020 8299 9255 tannas@dulwich.org.uk	Office on the first floor of the North Block
Lower School		
Fran Cooke (Head of Lower School)	020 8299 9283 CookeFA@dulwich.org.uk	Office on the first floor of the Lower School

Junior School		
Toby Griffiths (Head of Junior School)	020 8299 9248 griffithstga@dulwich.org.uk	Head's office in the Junior School
Ed Wickstead (Deputy Head of Junior School)	020 8299 9248 WicksteadE@dulwich.org.uk	Office in the Junior School
DUCKS (including Early Years Foundation Stage – EYFS)		
Jo Parker (Head of DUCKS and EYFS Designated Safeguarding Lead)	020 8693 1538 ParkerJM@dulwich.org.uk	Head's office in DUCKS Infants' School
Lucy Shaw (Deputy Head of DUCKS)	020 8693 1538 ShawLA@dulwich.org.uk	Deputy Head's office in DUCKS Infants' School
Operational Staff		
Julia Metzner (Head of Events)	020 8299 9286 metznerj@dulwich.org.uk	Events office in the green portacabins

GOVERNORS

Chair of Governors	Dr Adrian Carr
Safeguarding Governor	Dr Malik Ramadhan OBE

The Governors can be contacted via:

Ms Suzanne White (PA Governance & Finance)

Address: Dulwich College, Dulwich Common, London SE21 7LD

Office location: The Master's Office at Dulwich College (ground floor of the South Block)

Tel: 020 8693 3601

Email: whites1@dulwich.org.uk

KEY EXTERNAL SAFEGUARDING CONTACT DETAILS

SOUTHWARK CHILDREN'S SOCIAL CARE

Schools Safeguarding Co-ordinator: **Apo Çağirici** Tel: 020 7525 2715 / 07946453527

Email: Apo.Cagirici@southwark.gov.uk

Early help: Tel: 020 7525 1922

Email : earlyhelp@southwark.gov.uk

MASH (Multi-Agency Safeguarding Hub): Tel: 020 7525 1921 / (out of hours) 020 7525 5000
Email: mash@southwark.gov.uk

Local Authority Designated Officer (LADO): Eva Simcock Tel: 020 7525 0689
Email: Eva.Simcock@southwark.gov.uk / Qau.Safeguarding@southwark.gov.uk

One of the Child Protection Co-ordinators in the Quality Assurance Unit is on duty each day to deal with cases involving complaints or allegations against staff when the LADO is unavailable. The duty telephone number is 020 7525 3297.

Southwark is the College's Local Safeguarding Children Partnership, but contacts of other partnerships within the London Safeguarding Children Partnerships can be found here.

OTHER CONTACTS

Childline: 0800 1111 (24-hour freephone for children and young people who need advice).

NSPCC child protection helpline: 0808 800 5000 (24-hour freephone service for adults, children or young people for advice or to give details about a child who may be at risk).

NSPCC whistleblowing advice line: 0800 028 0285 (Monday to Friday 8am to 8pm; 9am to 6pm at weekends). Offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation); email: help@NSPCC.org.uk.

OFSTED: 0300 123 3155; email: whistleblowing@ofsted.gov.uk (whistleblowing helpline; Monday to Friday from 8am to 6pm).

Female genital mutilation: 101 (the single non-emergency number).

Domestic abuse:

- **Operation Encompass** provides an advice and helpline service for anyone in schools who may be concerned about children who have experienced domestic abuse: 0204 513 9990 (Monday to Friday from 8am to 1pm).
- **National domestic abuse helpline:** 0808 2000 247

Prevent

- Referrals should be made in accordance with the procedures for the local authority in which the pupil resides. For Southwark, completed Prevent referral forms should be sent to mash@southwark.gov.uk and copied to prevent@southwark.gov.uk.
- The Department for Education dedicated telephone helpline 020 7340 7264 and mailbox for non-emergency advice: counter.extremism@education.gov.uk.

Independent Schools Inspectorate: Tel: 020 7600 1000

Teaching Regulation Agency (TRA): Email: misconduct.teacher@education.gov.uk

2. FOREWORD

Dulwich College is committed to safeguarding and promoting the welfare of all pupils in its care and expects **everyone** who works at the College to share this responsibility. Through the implementation of the processes and procedures outlined in this policy, the Governors are committed to creating an environment where everyone who works in the College feels supported in their safeguarding role and able to raise concerns.

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

Safeguarding pupils and providing a safe environment in which they can learn is the responsibility of the whole College community. In order to fulfil this responsibility effectively, all College staff are expected to make sure that their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

All staff should be aware of indicators of types of abuse (physical, emotional and sexual), neglect, and exploitation, understanding that children can be at risk of harm inside and outside of the College, inside and outside of home, and online, and that children may be abused by an adult or adults, or by another child or children.

The College recognises that it has a pivotal role to play in multi-agency safeguarding arrangements. The College (with the Designated Safeguarding Lead as the primary point of contact) works constructively with and contributes to multi-agency safeguarding arrangements of the Southwark Children Safeguarding Partnership and other local authorities in which pupils attending the College reside.

Review of this policy

The Safeguarding (Child Protection) Policy is reviewed annually in the Michaelmas Term and as otherwise required, for example, in response to legislative/regulatory updates, following a change to procedures in response to 'lessons learnt'; reviews; and/or to ensure that it is up to date with best practice etc. The review process includes consultation with all relevant staff (including the College's team of Deputy Designated

Safeguarding Leads) and the Governors' Safeguarding Committee. The Board of Governors formally approves all changes to this policy.

3. PURPOSE OF THIS POLICY

This policy applies to:

- all children attending the College (including young people who may be over the age of 18), whether as a day pupil or a boarder, and including those pupils within EYFS (the Early Years Foundation Stage) at DUCKS; and
- all on and off-site activities undertaken by pupils whilst they are the responsibility of the College.

It has been prepared in accordance with relevant sector statutory and non-statutory guidance and takes into account the College's obligations as a charity (see **Appendix 3** for more details).

It is intended for all those who occupy positions of responsibility, work, volunteer or come into contact with children as part of their role at the College.

It is publicly available and is widely promoted.

It defines the key safeguarding roles, so that everybody knows who is responsible and to whom a concern can be raised.

It sets out:

- the steps to be taken if somebody is worried about a child or young person (**Section 6**);
- the steps to be taken if there are concerns about somebody working, volunteering, occupying a position of trust, or engaging with children and young people (**Section 7**);
- how to escalate concerns, whistleblow and share information (**Sections 8 and 9**);
- how pupils are educated and supported and how staff are trained in safeguarding (**Sections 10 and 11**);
- how appointments are made safely through the College's safer recruitment procedures (**Section 12**);
- support for staff and volunteers (**Section 13**);
- supporting procedures and guidance (set out in the various **Appendices**).

4. COMMITMENT TO SAFEGUARDING

The Master and the Board of Governors are committed to ensuring that safeguarding policies and procedures (particularly those concerning referrals of cases of suspected abuse and neglect) are understood and followed by all staff.

All staff remain alert to safeguarding risks and familiarity with this policy is ensured. They are trained in safeguarding at induction and such training is regularly updated (see **Section 11**).

All staff take all suspicions and/or allegations of abuse or risk to children seriously and respond swiftly in accordance with this policy. This includes taking seriously any allegations made against an adult working or volunteering with children.

All staff escalate matters of concern as required in accordance with this policy and are alert to the College's *Whistleblowing Policy*.

All concerns and discussions about a child's welfare, the decisions made, and the reasons for those decisions are recorded in writing. Records should include:

- the nature of the concern raised, by whom, and when; to whom the concern relates (ie a specific child, adult, or organisation);
- the points discussed with the Designated Safeguarding Lead and/or any other member of staff providing advice;
- when and with whom the discussion occurred, the decision reached, whether consent for referral was obtained, reasons for the actions taken and the outcome.

The first step in effectively protecting children from staff who might want to harm them is to accept that this risk exists and that this risk might exist from the people we work alongside. All those working at Dulwich College must be prepared to think the unthinkable, regardless of how challenging or uncomfortable this might be.

5. THE COLLEGE'S KEY SAFEGUARDING ROLES

The Governors have appointed the Deputy Master Pastoral & Co-Curricular as the College's Designated Safeguarding Lead ('DSL').

There is a Deputy Designated Safeguarding Lead ('DDSL') for the whole College who is the Safeguarding Manager.

In addition, other members of teaching and operational staff, including nominated members of the College's Senior Management Team, have been identified as providing safeguarding support for the relevant sections of the College (all details in **Section 1**) in particular, with EYFS responsibility in respect of DUCKS. However, the ultimate lead responsibility for safeguarding and child protection (including EYFS, online safety, and understanding the filtering and monitoring systems and processes in place) remains with the Deputy Master Pastoral & Co-Curricular.

The Deputy Master Pastoral & Co-Curricular and/or a Deputy Designated Safeguarding Lead will always be available during term time. One of the Deputy Master Pastoral & Co-Curricular or a Deputy Designated

Safeguarding Lead for the whole College will be available out of term time. This will remain the case even if the College is required to be shut owing to a pandemic or any other reason.

The Board has also nominated one of its Governors with leadership responsibility for safeguarding arrangements.

More details on the role and responsibilities of the Deputy Master Pastoral & Co-Curricular and the Governor with safeguarding responsibility are set out in **Appendix 11**.

Contact details for the College's key safeguarding roles are set out in **Section 1** of this policy.

6. WHAT TO DO IF YOU ARE WORRIED ABOUT A CHILD

The role of College staff

All College staff:

- should be aware that all staff are aware that safeguarding and promoting the welfare of the pupils is everyone's responsibility throughout the College and boarding facilities;
- have a particularly important role to play as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating;
- have responsibility to provide a safe environment in which pupils can learn;
- should be prepared to identify children who may benefit from early help (which is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse);
- should follow the College's agreed processes and procedures if they have any concerns about a pupil, and should expect to support social workers and other agencies following any referral;
- should be aware of their local early help process and understand their role in this;
- should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the *Children Act 1989*, especially Section 17 (children in need) and Section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments;
- should know what to do if a child tells them they are being abused, exploited, or neglected;
- should know how to manage the requirement to maintain an appropriate level of confidentiality (which means only involving those who need to be involved, such as the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) and local authority children's social care;
- never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child;

- should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe (a victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect, nor should a victim ever be made to feel ashamed for making a report);

- should be aware that children may 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 (for example, children may feel embarrassed, humiliated, or being threatened – this could be due to their vulnerability, disability and/or sexual orientation or language barriers and should not prevent staff from having a professional curiosity and speaking to the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) if they have concerns about a child;

- determine how best to build trusted relationships with children and young people which facilitate communication.

Staff are referred to **Appendices 4, 7, 8 and 10** of this policy which set out of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues.

Action to take

All College staff should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare (including concerns regarding possible child-on-child abuse), or identify a child in need, they must report the matter immediately to the Deputy Master Pastoral & Co-Curricular (the College's Designated Safeguarding Lead) or one of the College's Deputy Designated Safeguarding Leads: see Key College Safeguarding Contact Details at the start of this policy).

If, in exceptional circumstances, the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) is not available, staff are expected to speak to a member of the Senior Management Team and/or take advice from the local authority in which the pupil resides (a list of contacts can be found here), sharing any action taken with the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) as soon as is practically possible.

In normal circumstances, once a concern has been raised, the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will decide on the appropriate course of action to take, such as:

- managing support for the pupil internally, via the College's own pastoral support processes;

- an early help assessment;

- a referral for local authority children's social care/statutory services, for example **where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately (see Appendix 9).**

More details about College procedures and making referrals are set out in **Appendices 5, 6 and 9**.

Staff should not assume that a colleague, or another professional, will take action and share information that might be critical in keeping children safe. They should be mindful that early information-sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). More details on information sharing are set out in **Section 9** below.

7. WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN OR AN ALLEGATION ABOUT A MEMBER OF STAFF (INCLUDING SUPPLY STAFF, VOLUNTEER AND CONTRACTOR)

The College has processes and procedures in place to manage any safeguarding allegation or concern (no matter how small) about staff members (including supply staff, volunteers, and contractors).

If any member of staff has any safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, contractors, and visitors) posing a risk of harm to children, then:

- these should be referred to the Master (MilneRS@dulwich.org.uk), or, in their absence, the Deputy Master Pastoral & Co-Curricular (readej@dulwich.org.uk);
- where there are concerns/allegations about the Master, these should be referred to the Chair of Governors (Dr Adrian Carr) or, in his absence, the Safeguarding Governor (Dr Malik Ramadhan): Governors can be contacted via Ms Suzanne White, PA Governance & Finance (telephone 020 8693 3601; email whites1@dulwich.org.uk).

The procedures that will be taken in receiving and following any reports above are set out in **Section 1** of **Appendix 6**.

The College seeks to encourage an open and transparent culture to identify inappropriate, problematic or concerning behaviour early and consequently minimise the risk of abuse. Staff should be clear about professional boundaries and must act within these boundaries, particularly those set out in the *Staff Code of Conduct*. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers, or contractors) that:

- is inconsistent with the *Staff Code of Conduct*, including inappropriate conduct outside of work, and
- does not meet the harm threshold (as defined in **Section 1 of Appendix 6** below) or is otherwise not serious enough to consider a referral to the LADO,

then this should be shared with the Deputy Master Pastoral & Co-Curricular (or, in their absence, the Safeguarding Manager) in accordance with the College's low-level concerns procedure set out in **Section 2 of Appendix 6**.

8. ESCALATION / WHISTLEBLOWING

All College staff should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the College Leadership Team (CLT). Whistleblowing procedures are in place for such concerns to be raised with CLT and these are set out in the *Whistleblowing Policy* which can be located on the College's website.

Where a staff member feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them (also set out in the *Whistleblowing Policy*). General guidance on whistleblowing can be found via *Whistleblowing for Employees*, and the NSPCC's dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the College. Staff can call 0800 028 0285 or email help@nspcc.org.uk.

9. INFORMATION SHARING AND RECORDS

The College acknowledges that information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. College staff recognise the importance of information sharing between practitioners and local agencies. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If any member of staff is unsure what information can be shared and to whom, they should speak to the Deputy Master Pastoral & Co-Curricular (or any Deputy Designated Safeguarding Lead). The College has implemented the following protocols in relation to the storage and sharing of records:

- All safeguarding and child protection records are kept securely on the College's Child Protection Online Management System (CPOMS) and separate from educational records. They may only be accessed by appropriate safeguarding and pastoral staff.
- Safeguarding and child protection records are reviewed regularly by pastoral teams so that concerning patterns of behaviour can be spotted and appropriate interventions made.
- Once places at the College for the following academic year have been accepted, the Deputy Master Pastoral & Co-Curricular writes to the Designated Safeguarding Lead at the respective feeder schools to request that they complete a confidential safeguarding/pastoral enquiry form and return this with the pupil's safeguarding file.
- When pupils leave to go to another school, safeguarding/child protection records are sent to the receiving school separately and under a confidential cover (separately from the main pupil file) in accordance with the required timescales. A receipt is obtained.
- Once leavers have finalised their plans for the next academic year and following publication of A level results in August, the Deputy Master Pastoral & Co-Curricular and Head of Upper School judge whether it is appropriate for information about a pupil (beyond that included on their UCAS form) to

be transferred to their university/college in the interests of their personal wellbeing. This is in conjunction with the pupil and a receipt of the information sent is sought from the university's welfare department.

10. EDUCATING AND SUPPORTING PUPILS, INCLUDING ONLINE SAFETY

The College acknowledges the important role that the curriculum can play in teaching children to keep themselves safe in, for example, the prevention of abuse and in the preparation of pupils for the responsibilities of adult life and citizenship. The College ensures that pupils are taught about safeguarding, including online safety, and will consider this as part of providing a broad and balanced curriculum.

The College is also aware of its critical role in preventative education and preparing its pupils for life in modern Britain. The College endeavours to create a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment through the content and implementation of its policies (particularly the *Staff Code of Conduct* and *Behaviour policies*) and its comprehensive pastoral support system. The Wellbeing programme is delivered via regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive, developed to be age- and stage-of-development appropriate, and addresses issues including:

- healthy and respectful relationships;
- boundaries and consent;
- stereotyping, prejudice and equality;
- body confidence and self-esteem;
- how to recognise an abusive relationship, including coercive and controlling behaviour;
- the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called 'honour'- based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support; and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

The College recognises that a 'one-size-fits-all' approach may not be appropriate for all children, and a more effective education will be tailored to specific needs and vulnerabilities of individual pupils including children who are victims of abuse and with special educational needs or disabilities. This is taken into consideration in providing a broad and balanced curriculum, which includes Relationships and Sex Education and Health Education. This is outlined in: *DUCKS Relationships and Health Education Policy*, *Junior School Relationships and Sex Education Policy* and the *Relationships and Sex Education Policy (Years 7 to 13)*.

Online safety

The College recognises that technology is a significant component in many safeguarding issues and that an effective approach to online safety empowers a school to protect and educate the whole College community in their use of technology, and has mechanisms to identify, intervene in and handle incidents that occur. The College also recognises that access to the internet means that some pupils sexually harass other children via their mobile and smart technology, share indecent images (consensually and non-consensually, at times via large chat groups), and view and share pornography and other harmful content.

In considering its responsibility to safeguard and promote the welfare of all pupils and provide them with a safe environment in which to learn, the College seeks to limit their exposure to online risks. Pupils have access to a secure Wi-Fi connection, which has appropriate filters, and, in deterring pupils from using 3G/4G/5G, enables activity to be monitored and acted upon. The College regularly reviews the effectiveness of filters in place, and adjusts accordingly, taking into account the number and age range of our pupils, those who are potentially at greater risk of harm, and how often they access the IT system. We also ensure that 'over-blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regard to online safety and safeguarding.

In accordance with the Department for Education's filtering and monitoring standards, and in order to fulfil its duty in ensuring the appropriateness of its filtering and monitoring systems (on College devices and College networks), the College:

- has identified and assigned roles and responsibilities to manage filtering and monitoring systems;
- reviews its filtering and monitoring provision at least annually (drawing on guidance including the Department for Education's *Generative AI: product safety expectations*);
- blocks harmful and inappropriate content without unreasonably affecting teaching and learning; and
- has effective monitoring strategies in place that meets our safeguarding needs.

Pupils are taught about online safety, where the breadth of issues can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content; for example, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example, peer-to-peer pressure and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images (consensual and non-consensual sharing of nudes and semi-nudes) and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College has an *Online Safety Policy* covering the matters listed above and ensures that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. Considering online safety is critical whilst planning the curriculum, teacher training, the role and responsibilities of relevant staff and parental engagement. Pupils are required to comply with the *ICT Acceptable Use Policy (including Mobile Phones) – Pupils*, and the *Sharing Nudes and Semi-Nudes (including Sexting) Policy*, so that they are aware of the College's approach to dealing with these matters. Where children are asked to access

remote learning, the College has due regard for advice offered by the relevant bodies, including the Department for Education, so that pupils are able to keep themselves safe.

All members of staff are required to have read and to follow the *College's ICT Acceptable Use Policy*, the *Social Media Policy*, and the *Online Safety Policy*.

In addition, DUCKS has a *Mobile Phone and Devices Policy*, governing the use of phones and cameras at DUCKS which states in particular:

- all images/recordings taken must be deemed suitable without putting the child/ren in any compromising positions that could cause embarrassment or distress;
- no photographs may be taken by staff in the bathrooms or nappy-changing areas without the consent of the Head or Deputy Head of DUCKS.

11. STAFF TRAINING

All staff (including volunteers and temporary staff) undergo safeguarding and child-protection (including online and Prevent) training at induction.

All staff are required to confirm that they have read and understood Part One and Annex B of *Keeping children safe in education* on an annual basis.

The Board of Governors is required to confirm that they have read and understood Parts One and Four of *Keeping children safe in education*. For members of the Governors' Safeguarding Committee, this requirement extends to the whole document.

All staff receive an annual safeguarding and child protection (including online safety and Prevent) update in line with advice from the Department for Education and the Southwark Safeguarding Children Partnership. Additional updates are provided as appropriate. All staff receive full safeguarding refresher training every two to three years.

Safeguarding training for staff is integrated, aligned, and considered as part of the whole-College safeguarding approach and wider staff training and curriculum planning.

In line with the criteria set out in Annex C of the *Early years foundation stage statutory framework*, practitioners working in the EYFS in DUCKS receive additional bespoke training that is designed for those caring for 0 to 5 year-olds.

The safeguarding training provided on induction covers:

- this *Safeguarding (Child Protection) Policy* which includes:
  - the role and identity of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads;

- policy and procedures for dealing with child-on-child abuse;
- the low-level concerns procedure;

- the College's *Code of Conduct*;
- the *Staff Code of Conduct*;
- the *Whistleblowing Policy*;
- the *Behaviour policies* (which include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the *Mental Health Policy*;
- the *Online Safety Policy* (including, amongst other points, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring of IT systems and devices);
- the *ICT Acceptable Use Policy*;
- the *Social Media Policy*;
- the *Attendance and Registration* and *Missing Pupil policies*; and
- Part One and Annex B of *Keeping children safe in education*.

Governors receive safeguarding and child protection (including online) training on induction (which is regularly updated) to ensure critical challenge of the effective implementation of the College's safeguarding policies and procedures. Governors are fully aware of their obligations under the *Human Rights Act 1998* and *Equality Act 2010*. More information regarding the involvement of the Governors on the Safeguarding Committee is set out in **Appendix 11**.

The Deputy Master Pastoral & Co-Curricular and the Deputy Designated Safeguarding Lead s attend training in inter-agency working and Prevent at least every two years, in addition to receiving informal updates (particularly from the Southwark local authority children's social care). This training is also attended by a number of additional key pastoral and operational staff.

Along with the Deputy Master Pastoral & Co-Curricular, Deputy Designated Safeguarding Leads are encouraged to attend appropriate network meetings and to participate in the multi-agency training programme organised by the Southwark Safeguarding Children Partnership.

12. SAFER RECRUITMENT

The College is committed to safer recruitment and has adopted procedures and processes (including its Recruitment Policy and safeguarding checks protocols) that are intended to help deter, reject or identify people who might abuse children and have regard for the Department for Education's statutory guidance for schools about the employment of staff disqualified from childcare *Disqualification under the Childcare Act 2006*, which also contains information about 'disqualification by association'.

13. SUPPORT FOR STAFF AND VOLUNTEERS

All staff are able to access occupational health and counselling services as part of the support available to them. Supervision is also offered to the wider safeguarding and pastoral teams.

Appendix 1: Principles

The Board of Governors facilitates a whole-College approach to safeguarding. This means ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development so that they operate with the best interests of the child at their heart:

- Where there is a safeguarding concern, the College ensures that the child's wishes and feelings are taken into account when determining what which action to take and what services to provide.
- Systems are in place, well promoted, easily understood and easily accessible for children to report abuse confidently, knowing that their concerns will be treated seriously, and knowing that they can safely express their views and give feedback.
- The College works in partnership with parents, guardians or carers to secure the best outcomes for its pupils.
- Guidance and training are provided to staff regarding safeguarding matters, and they are required to comply with the *Staff Code of Conduct*.
- The College communicates the safeguarding aims of the College clearly, using unambiguous statements in advertisements, brochures and correspondence.
- Staff and pupils are involved in the review of this policy and in the development of associated policies (eg the College's *Code of Conduct* and *Behaviour policies*), and communicate these to parents.
- The College liaises with agencies in the statutory, voluntary and community sectors that are active in supporting families.
- Where a pupil needs additional support from one or more agencies, the College operates in line with locally agreed inter-agency procedures and assist the agencies involved to conduct assessments.
- Staff share information as appropriate, recognising that this is vital to identify and tackle abuse and neglect, and to promote children's welfare, including their educational outcomes. It is understood that the College has clear powers to share, hold and use information for these purposes.
- Staff are alert to the needs of parents/carers who do not have English as their first language.

Appendix 2: Equality and diversity – anti-discriminatory practice

Governors and staff are aware of the obligations contained in the *Human Rights Act 1998 (HRA)* and the *Equality Act 2010*.

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to and it is unlawful for schools to act in a way that is incompatible with those rights. Specific rights applying to schools are:

- the right to freedom from inhuman and degrading treatment;
- the right to respect for private and family life including a duty to protect individuals' physical and psychological integrity;
- the right to education.

Furthermore, the rights and freedoms set out in the *HRA* must be protected and applied without discrimination; being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

In accordance with the *Equality Act 2010*, schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

The College does not unlawfully discriminate, and has procedures in place to prevent discrimination, against pupils because of any protected characteristics. In the context of safeguarding, the College carefully considers, particularly with regard to its policies and procedures, whether and how best it can support pupils – both in ensuring their welfare and with regard to protected characteristics, including disability, sexual orientation and race. The College acknowledges that it can take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils with certain characteristics in order to meet their specific need; this encompasses a duty to make reasonable adjustments for disabled children and young people, including those with long-term conditions.

The College does not discriminate, and has procedures in place to prevent discrimination against, pupils for reasons other than because of any protected characteristics eg cultural background or academic/sporting abilities.

The College promotes an inclusive environment protecting all pupils from all and any forms of discrimination. In the creation, implementation and regular review of all policies and procedures, the College prioritises the safeguarding and promotion of welfare of pupils and seeks to support all pupils from all and any forms of discrimination.

Appendix 3: Legislation, guidance and policies

This policy has due regard for all relevant legislation and guidance including:

- the *Education acts*;
- the *Children Act 2004*;
- the *Equality Act 2010*;
- the *Human Rights Act 1998*;
- the *Education (independent school standards) regulations 2014*;
- the *National minimum standards for boarding schools*;
- *Early years foundation stage statutory framework*;
- *Keeping children safe in education 2025 – Statutory guidance for schools and colleges* (September 2025);
- *Working together to safeguard children – A guide to multi-agency working to help, protect and promote the welfare of children* (March 2026);
- *The Prevent duty: an introduction for those with safeguarding responsibilities* (September 2023);
- *Understanding and identifying radicalisation risk in your education setting* (September 2023);
- *What to do if you're worried a child is being abused – Advice for practitioners* (March 2015);
- *Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers* (May 2024);
- *Children missing education – statutory guidance* (September 2024)
- *When to call the police – Guidance for schools and colleges*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities* (February 2024)
- *The Independent school standards: guidance for independent schools* (April 2026);
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (March 2024);
- *Relationships education, relationships and sex education (RSE) and health education statutory guidance*;

- Charity Commission's *Strategy for dealing with safeguarding issues in charities*;
- Charity Commission's *Guidance for trustees on safeguarding and protecting people*;
- Charity Commission *Guidance (Safeguarding for charities and trustees)*; and
- Ofsted guidance.

In addition, this document has due regard for the inter-agency safeguarding procedures produced by the Southwark Safeguarding Children Partnership, and has adopted and works in association with several other College policies (including for the avoidance of doubt those policies applying only to the Junior School or DUCKS) which can be viewed on the policies page of the College's website or the College's intranet including:

- *Anti-Bullying policies*;
- *Attendance and Registration policies*;
- *Behaviour policies*;
- the College's *Code of Conduct*;
- *Drugs Policy*;
- the *DUCKS Mobile Phone and Devices Policy*;
- *Health and Safety policies*;
- *ICT Acceptable Use Policy (Pupils)*;
- *Intimate Care Policy for DUCKS*;
- *Mental Health Policy*;
- *Missing Pupil policies*;
- *Online Safety Policy*;
- *Policy for Boarding House Residential Staff, Families and Visitors*
- *Recruitment Policy*;
- *Relationships and Sex Education policies*;
- *Searching and Confiscation of Pupil Property (Years 3 to 13)*;
- *Sharing Nudes and Semi-Nudes Policy*;
- *Staff Code of Conduct*;

- *Supervision Policies*
- *Restrictive Interventions Policy*; and
- *Whistleblowing Policy*.

Appendix 4: Signs and symptoms of child abuse

Early help

Whilst any child may benefit from early help, all College staff are particularly alert to the potential need for early help for a pupil 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 education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and/or other drugs themselves;
- is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage;
- is a privately fostered child.

Abuse, neglect and exploitation

All College staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of College, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

All College staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All College staff, but especially the Deputy Master Pastoral & Co-Curricular (and the Deputy Designated Safeguarding Leads), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

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

In all cases, if staff are unsure, they should always speak to the Deputy Master Pastoral & Co-Curricular as the Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead).

Indicators of abuse and neglect

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

Types of abuse and neglect include:

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as

well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place on-line and technology can be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and all staff should be aware of it and of the College's policy and procedures for dealing with it (see **Appendix 5**).

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

Appendix 5: Sexual violence and sexual harassment between children

This Appendix sets out how the College will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of College and/or online.

Definitions

Sexual violence is defined as offences under the Sexual Offences Act 2003:

- rape;
- assault by penetration;
- sexual assault;
- causing someone to engage in sexual activity without consent;

and can happen both inside and outside of College.

Consent is about having the freedom and capacity to choose. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16.

Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of College. Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes;
- displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment (consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, sharing of unwanted explicit content, sexualised online bullying and unwanted sexual comments and messages, including on social media).

Harmful sexual behaviour (HSB): children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face to face and can also occur simultaneously between the two. The College considers HSB in a child protection context, taking into account both the ages and the stages of development of the children as critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly

if they have power over them: for example if the older child is disabled or smaller in stature. The College recognises that a good understanding of HSB aids in planning preventative education, implementing preventative measures and incorporating an understanding of sexual violence and sexual harassment into a whole-College approach to safeguarding. 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. The College works with appropriate agencies to address HSB and to support children displaying HSB.

Approach

The College recognises that sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and face to face (both physically and verbally) and are never acceptable.

College staff understand that:

- the College has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and it will not be tolerated. Staff will never dismiss unacceptable behaviour, recognising that it should never be passed off as 'banter', 'just having a laugh', 'a part of growing up' or 'boys being boys'.

- they are expected to maintain an attitude of 'it could happen here', knowing that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Even if there are no reports, it does not mean it is not happening: it may be the case that it is just not being reported.

- dismissing or tolerating challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts risks normalising them.

The College recognises that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

The College is aware that safeguarding incidents and/or behaviours can be associated with factors outside of school, including intimate personal relationships.

Whilst any report of sexual violence or sexual harassment should be taken seriously, College staff are aware that it is more likely that girls will be the victims of sexual violence and sexual harassment, and more likely that it will be perpetrated by boys. Children with special educational needs and disabilities are also three times more likely to be abused than their peers.

Victims will be 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 school 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. The law is in place to protect children and young people rather than to criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The College accepts that pupils may not find it easy to tell staff about their abuse. They 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 College staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The College recognises that the way in which it responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

Receiving a report of sexual violence or harassment

All staff are trained to manage a report of sexual violence or harassment and the following steps will be observed:

- If possible, two members of staff will be present when a report is made (preferably one of them being the Deputy Master Pastoral & Co-Curricular or a Deputy Designated Safeguarding Lead).
- Where the report includes an online element, the College has due regard for the *Searching and Confiscation of Pupil Property* and *Sharing Nudes and Semi-Nudes (including Sexting) policies*. It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection. The key consideration is for staff not to view or forward illegal images of a child.
- Confidentiality will not be promised at the initial stage as it is very likely a concern will have to be shared further (for example, with the Deputy Master Pastoral & Co-Curricular or local authority children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- The member of staff to whom the pupil makes the disclosure will recognise that the child has placed them in a position of trust. They will be supportive and respectful of the child.

- It will be recognised that an initial disclosure may only be the first incident reported, rather than representative of a singular incident, and that trauma can affect memory and so children may not be able to recall all details or the timeline of abuse.

- It will be borne in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

- The member of staff will listen carefully to the child; reflect back, using the child's language; be non-judgmental; be clear about boundaries and how the report will be progressed; and will not ask leading questions, only prompting the child where necessary with open questions – where, when, what, etc. Whilst leading questions will be avoided, staff may ask children if they have been harmed and what the nature of that harm was.

- A thorough summary will be written up immediately after the report has been made. This will allow the member of staff to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes whilst speaking to the child (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

- Facts will only be recorded as the child presents them. The notes will not reflect the personal opinion of the note-taker. The College understands that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation.

The Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will be informed as soon as practically possible, if they were not involved in the initial report.

Confidentiality and anonymity

As stated above, staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The victim may not give consent to share information and advice should be sought from the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead), who will apply the appropriate law and guidance balancing the victim's wishes against their duty to protect the victim and other children. The College should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

Risk assessment

When there has been a report of sexual violence, the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment is considered on a case-by-case basis.

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);
- all the other children, pupils and College staff, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms; and
- the time and location of the incident and any action required to make the location safer.

Risk assessments will be recorded (written or electronic) and kept under review. At all times, the College will actively consider the risks posed to all its pupils and put adequate measures in place to protect them and keep them safe.

The Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will ensure they are engaging with local authority children's social care and specialist services as required.

Action following a report

The College will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including incidents that have happened outside of the school. The Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) is likely to have the most complete safeguarding picture and be the most appropriate person to advise on the College's initial response.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the College's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed.
- The ages of the children involved and the developmental stages of the children involved.
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).

- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intrafamilial harms and any necessary support for siblings following incidents.
- Appropriate language to be adopted: whilst this policy refers to the terms 'victim' and 'perpetrator' and 'alleged perpetrator(s)', the College shall consider the appropriate terminology to be used in dealing with each situation on a case-by-case basis.
- Ongoing risks to the victim, other children, pupils, or College staff.
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, College staff will consider every report on a case-by-case basis but always act in the best interests of the child. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/affected).

There are four likely scenarios for the College to consider when managing any reports of sexual violence and/or sexual harassment:

- manage internally;
- early help;
- referral to local authority children's social care;
- report to the police.

The starting point regarding any report will be that there is a 'zero-tolerance' approach to sexual violence and sexual harassment, that it is never acceptable, and that it will not be tolerated.

In all scenarios all concerns, discussions, decisions and reasons for decisions should be recorded (in writing or electronically). Records are reviewed regularly by the Deputy Master Pastoral & Co-Curricular so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Deputy Master Pastoral & Co-Curricular will consider whether the person who has made the allegation is in need of help or may have been abused by someone else and this was a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made the report in accordance with the relevant *Behaviour Policy*.

Manage internally

In some cases of sexual harassment (e.g. one-off incidents), the College may take the view that the children concerned are not in need of early help and/or that referrals do not need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising the College's Behaviour policies and by providing pastoral support.

Early help

The College may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help can be particularly useful to address non-violent harmful sexual behaviour (see above) and may prevent escalation of sexual violence. Early help and the option to manage a report internally do not need to be mutually exclusive: the College could manage internally and seek early help for both the victim and perpetrator(s).

The Deputy Master Pastoral & Co-Curricular is familiar with London Safeguarding Children Partnership's threshold document in determining whether to seek early help services. In some cases, the College may manage internally and seek early help for both the victim and alleged perpetrator(s).

Referral to local authority children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, the College will make a referral to local authority children's social care.

At the point of referral to local authority children's social care, the College will generally inform parents or carers, unless there are compelling reasons not to (e.g. if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of local authority children's social care.

If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the College will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

The College will not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the College. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the College will be immediate.

In some cases, local authority children's social care will review the evidence and decide a statutory intervention is not appropriate. The College would be prepared to refer again if they believe the child remained in immediate danger or at risk of harm or if circumstances change. If a statutory assessment was

not appropriate, the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will consider other support mechanisms such as early help, specialist support and pastoral support.

Reporting to the police

Any report to the police will generally be in parallel with a referral to local authority children's social care.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal-justice, approach.

Where a report has been made to the police, the College will consult with the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. There may be delays in any case that is progressed through the criminal justice system. The College will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other pupils.

At this stage, the College will generally inform parents or carers unless there are compelling reasons not to (eg if informing a parent or carer is likely to put a child at additional risk). In circumstances where parents or carers have not been informed, it will be especially important that the College is supporting the child in any decision it takes. This will be with the support of local authority children's social care and any appropriate specialist agencies.

In some cases, it may very quickly become clear that the police (for whatever reason) will not take further action. In such circumstances, it is important that College continues to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) to work closely with the police (and other agencies as required), to ensure any actions the College takes do not jeopardise the police investigation.

Ongoing response – safeguarding and supporting the victim

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

The following will be taken into account:

- the age and the developmental stage of the victim;

- the nature of the allegations and the potential risk of further abuse.

The College is aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

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

Support will be tailored on a case-by-case basis and in a proportionate way. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

The College is aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy.

Support can include:

- Early help and local authority children's social care;
- Children and young people's independent sexual violence advisors (ChISVAs);
- Police and social care agencies can signpost to ChISVA services (where available), or referrals can be made directly to the ChISVA service by the young person or the College;
- Child and adolescent mental health services (CAMHS);
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence;
- NHS – help after rape and sexual assault (https://www.nhs.uk/);
- Rape and sexual assault referral centres services;
- Childline;
- Internet Watch Foundation;
- Childline / IWF: Remove a nude image shared online.

In dealing with cases, the College will also take the following points into account:

- Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the College will ask the victim if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible), and the College will respect and support this choice.

- Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. The College will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (eg about attendance in lessons) irrespective of how overt the child's distress is.

- While the College will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to withdraw, not because it makes it easier to manage the situation. If required, the College should provide a physical space for victims to withdraw.

- It may be necessary to maintain arrangements to protect and support the victim for a long time. The College will be prepared for this and will work with local authority children's social care and other agencies as required.

- The College will do everything it reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

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

- It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The Deputy Master Pastoral & Co-Curricular will take responsibility to ensure this happens (and discuss with the victim and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the pupil's safeguarding file in accordance with any prescribed timescales.

- Consideration will be given as to whether there are wider cultural issues within the College that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Safeguarding and supporting the alleged perpetrator(s)

The College will consider the following principles in reaching decisions regarding safeguarding and supporting the alleged perpetrator(s):

- Whether disciplinary action should be taken and what support should be provided to the alleged perpetrator(s). Such decisions will be determined by a number of factors including: the age and the developmental stage of the alleged perpetrator(s), and the nature of the allegations and frequency of allegations. In addition, any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them. Support (and sanctions) will be considered on a case-by-case basis.

- The Deputy Master Pastoral & Co-Curricular will also be mindful as to whether any alleged perpetrator(s) are exhibiting harmful sexual behaviours (see above) that will inform their decisions in this regard.

Safeguarding other children

Consideration is given to supporting pupils who have witnessed sexual violence. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take 'sides'. The College will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

Appendix 6: Safeguarding concerns and allegations made about staff, including supply staff, volunteers and contractors

The College takes seriously all cases that involve concerns and/or allegations against staff (and references to 'allegation' shall refer to allegations and concerns in this **Appendix 6**).

When handling any such cases, the College follows the guidance given by the Department for Education in Part 4 of *Keeping children safe in education*.

Section 1: Allegations that may meet the harm threshold

As set out in **Part 7** of this policy above, where there is an allegation that a member of staff (including a member of supply staff, volunteers, contractors or another individual or organisation using the College premises for the purposes of running activities for children):

- 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 that they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates that they may not be suitable to work with children (including behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children, known as transferable risk);

this must be reported wherever possible in the first instance to the Master (MilneRS@dulwich.org.uk), or, in their absence, to the Deputy Master Pastoral & Co-Curricular (readej@dulwich.org.uk).

Any allegations relating to the Master must be reported to the Chair of Governors (Dr Adrian Carr) or, in his absence, the Safeguarding Governor (Dr Malik Ramadhan). Governors can be contacted via Ms Suzanne White, PA Governance & Finance (tel 020 8693 3601; email whites1@dulwich.org.uk).

Initial response

There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child**: the Deputy Master Pastoral & Co-Curricular is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation**: where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a 'case manager' will be appointed by the College to lead the investigation. The case manager will be either the Master or a person with appropriate authority appointed by the Master, and is responsible for discussing with the LADO the nature, content and context of the allegation, and agreeing a course of action. If the

Master is the subject of an allegation, the case manager will usually be either the Chair of Governors or the Safeguarding Governor.

When dealing with allegations, the College will:

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

The College is very aware of the local authority arrangements/information required/contact details for managing allegations and before contacting the LADO, the College will 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. When to inform the individual of the allegation will be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

Where the College identifies that a child has been harmed or is at immediate risk of harm or if the situation is an emergency, children's social care and (where appropriate) the police will be contacted immediately.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance *Working together to safeguard children*.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the Deputy Master Pastoral & Co-Curricular and undertake a risk assessment; it may be necessary for the Deputy Master Pastoral & Co-Curricular to make a referral to local authority children's social care.

If the allegation relates to physical contact (for example restraint) the strategy discussion or initial evaluation with the LADO will take into account that teachers and other College staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or local authority children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager. If there is no further action, the case manager and the LADO should record the decision and the justification. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The College will act in accordance with the advice and guidance provided by the LADO and ensure an investigation is undertaken by senior staff (as and when required). The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly (and no longer than monthly) intervals, should be set at the review meeting if the investigation continues.

For pupils in the Early Years Foundation Stage, the College will also inform Ofsted, as soon as is reasonably practicable, but at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working, or looking after children on College property (whether that allegation relates to harm or abuse committed on College property or elsewhere), and of the action taken in respect of these allegations. Furthermore, the College must notify Ofsted, of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.

Supply staff

Temporary and visiting staff will be subject to the same procedures in relation to safeguarding complaints and allegations, as permanent staff. Where an allegation relates to an individual not directly employed by the College, such as a member of supply staff provided by an agency, the College will ensure that allegations are dealt with properly, take account of the agency's policies, and ensure the agency is fully involved. In no circumstances will the College decide to cease to use a supply staff owing to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

Suspension

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step (eg redeployment, supervision etc.). The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the College, until the allegation is resolved. If immediate suspension is considered necessary, the case manager should record the rationale and justification. If the College is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at College, they should take immediate action to ensure the individual does not carry out work in contravention of the order i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. If a member of staff living in the boarding houses is suspended pending an investigation of a child protection nature, the College will make arrangements for alternative accommodation (away from children) to be provided until the matter has been resolved. Where it has been deemed appropriate to suspend the person they should be informed of their named contact is within the College and provided with their contact details.

Supporting those involved

The welfare of the child is paramount, but the College has a duty of care to its employee. The College should inform the individual as soon as possible, explaining the likely course of action (guided by the LADO and the police where necessary) and should provide support as required.

Parents or carers of the child or children involved should be formally told about the allegation as soon as possible and the case manager should consult the LADO and (as applicable) the local authority children's social care and/or the police on what information can be disclosed. They should then be kept informed about the progress of the case but only in relation to their child; no information can be shared regarding the staff member and the parents should be made aware of the requirement to maintain confidentiality.

Confidentiality and information sharing

The College will co-operate with the agencies/police regarding information sharing and the College must make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager should take advice from the LADO, the police and local authority children's social care to agree who needs to know and exactly what information can be shared and what, if any, information can be reasonably given to the wider community.

Allegation outcomes

The definitions that should be used the College determines the outcome of an allegation are:

- **substantiated** (there is sufficient evidence to prove the allegation);
- **malicious** (there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation);
- **false** (there is sufficient evidence to disprove the allegation);
- **unsubstantiated** (there is insufficient evidence to either prove or disprove the allegation - the term, therefore, does not imply guilt or innocence); or
- **unfounded** (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

The options open to the College depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

The allegation may be substantiated and the College will comply with its legal duty to make a referral as soon as possible to the DBS, where it removes an individual from regulated activity (or would have removed them if they had not left) and they believe the individual satisfies the DBS duty criteria explained in the DBS referral guidance. Furthermore, consideration will be given to making a referral to the TRA where a teacher has been dismissed for misconduct (or would have been dismissed had they not resigned first).

Record keeping

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations (ie substantiated, unfounded and unsubstantiated) it is important that detailed records (including summary of the allegation, outcome, declaration on whether to be included in a reference, whether a copy provided to the individual, as agreed by children's social care or the police) are made and retained on the file of the person accused. Records will be retained in accordance with the College's retention policy.

Lessons learned

If an allegation against a member of staff is substantiated, the College will work with the LADO to determine whether any improvement should be made to the College's safeguarding procedures or practices. Where the allegation was concluded to be either, unfounded, false, malicious or unsubstantiated, the College would consider the facts and determine whether any lessons could be learned and if improvements could be made.

Non-recent allegations

Where an adult makes an allegation to the College that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

Section 2: Low-level concerns

Creating and maintaining a culture in which **all** safeguarding concerns are shared, recorded and dealt with appropriately is critical to effective safeguarding. This encompasses concerns (including allegations) which do not meet the harm threshold (set out in Section 1 above).

We all have a shared responsibility to maintain an open and transparent culture that:

- enables us to identify inappropriate, problematic or concerning behaviour early;
- ensures that staff are clear about professional boundaries and act within these boundaries, and in accordance with the College's ethos and values; and
- minimises the risk of abuse.

We must together:

- reduce the opportunity for, and perceived acceptability of, inappropriate behaviours;
- increase the effort required to offend;
- increase the risk, and the perception of the risk, of detection; and
- not over-rely on DBS and overseas criminal record checks.

Whilst essential, a clear DBS check simply confirms that an individual has not been found to present a risk to children: it is not predictive about potential risk. Research shows that the majority of institutional offenders did not have a previous criminal record.

Low-level concerns

The term 'low-level' concern does not mean that it is insignificant. It is any concern — **no matter how small**, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a

way that is inconsistent with the *Staff Code of Conduct*, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to College policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

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

Low-level concerns may arise in several ways and from a number of sources. For example: 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.

Research on offenders

Research with sexual offenders has shown that a number reported work-related stressors (including lack of support and working long hours) as well as personal issues (including having been abused themselves as children; recent loss of intimate relationships, questioning their sexual orientation; and a history of self-harm/suicidal thoughts). Some showed patterns of rule-breaking more generally (including breaches of other rules) in addition to the abuse of children.

The method of commencing the abuse included the erosion of boundaries; slow progression to abuse; use of trust and authority; meeting the child's needs (including physical and emotional); and developing relationships with the child's family.

Boundaries

There seems to be a 'slippery slope' of boundary violations towards abuse and that there are many stages on the slippery slope towards the breach of a boundary within a relationship.

Sometimes initial infringements are part of a grooming process but at other times they are made innocently and with good intention. However, once boundaries are breached, it then becomes more difficult to restore the relationship to one in which proper boundaries are respected.

Serious case reviews in the sector repeatedly indicate that staff, parents and parents were often aware of individual incidents of inappropriate behaviour, but that there was a failure to 'join the dots' and take

appropriate action: concerns were not voiced; incidents were viewed in isolation and as too low-level to require reporting. We all must ensure that that does not happen here.

Duty to report low-level concerns

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working at the College from becoming the subject of potential false low-level concerns or misunderstandings.

Staff should share with the Deputy Master Pastoral & Co-Curricular (or, in their absence, the Safeguarding Manager) any concerns that they may have about a colleague's behaviour. Whilst the concern may seem very minor and one-off, the behaviour may form part of a pattern that is putting children at risk or (without intervention) may develop into such a pattern. The behaviour may have been innocent, but the member of staff may need to be given guidance to understand why it was inappropriate and should not happen again.

Staff should also 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 professional standards expected by the College.

Both the Deputy Master Pastoral & Co-Curricular and the Safeguarding Manager can be reached at safeguarding@dulwich.org.uk or via 020 8299 9229 / 333).

Concerns reported to either the Deputy Master Pastoral & Co-Curricular or the Safeguarding Manager will be shared with the Master.

The Deputy Master Pastoral & Co-Curricular should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

The Deputy Master Pastoral & Co-Curricular will then consider how the matter should be handled (although, depending on the nature of some low-level concerns the Deputy Master Pastoral & Co-Curricular may wish to consult with the Master and take a more collaborative decision-making approach). This may be internal disciplinary procedures. A series of low-level concerns may cumulatively meet the mandatory reporting threshold (see **Section 1** of this **Appendix 6**) and need to be reported to the local authority as such.

Agency staff or contractors

Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the Deputy Master Pastoral & Co-Curricular (or, in their absence, the Safeguarding Manager) via safeguarding@dulwich.org.uk or on 020 8299 9229 / 333). The concern will be recorded, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Confidentiality

Staff can be assured that low-level concerns are handled fairly and proportionately by the College and with appropriate confidentiality.

Every effort will be made to keep confidential the identity of a member of staff who reports a low-level concern under this policy (i. not to disclose their identity to the person whose behaviour has given rise to concerns), at least until any formal investigation is under way. There may be circumstances in which, because of the nature of the investigation or concern, it will be necessary to disclose their identity to the relevant person. If in the College's view such circumstances exist, the College will make efforts to inform the member of staff who has reported the concern that their identity is likely to be disclosed.

Recording and reviewing low-level concerns

All low-level concerns are recorded in writing and kept confidentially on CPOMS. Records include details of the concern, the context in which the concern arose, and action taken. Any records should include the rationale for all decisions and actions. The name of the individual sharing their concerns is also noted; if the individual wishes to remain anonymous, this is respected as far as reasonably possible.

It is for the College to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

Regular review of low-level concerns

A regular review of reported low-level concerns will be undertaken to ensure that:

- the concerns are being handled appropriately and proportionately;
- no concerns meet the threshold of mandatory reporting to the local authority;
- patterns of inappropriate, problematic or concerning behaviour can be identified and responded to; and
- any wider cultural issues within the College that potentially enabled the behaviour to occur can be addressed by, for example, revising appropriate policies or delivering extra training to minimise the risk of it happening again.

The Master and the Deputy Master Pastoral & Co-Curricular are responsible for conducting that review.

Appendix 7: Other safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are safeguarding issues all staff should be aware of. Staff should report their concerns relating to any safeguarding issues set out below in accordance with the procedures set out in this Policy

Child-on-child (previously known as peer-on-peer) abuse

The College recognises that children are capable of abusing other children. This can happen both inside and outside of College and online. All staff should recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

College staff should understand that even if there are no reports in the College, this does not mean it is not happening. It may be the case that abuse is not being reported. As such it is very important that when staff have **any** concerns regarding child-on-child abuse, they should speak to the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead).

The College has a zero-tolerance approach to child-on-child abuse. All staff must understand the importance of challenging inappropriate behaviours between children, examples of which are listed below. Downplaying behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children, and in worst-case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage-relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence, more details on which can be found at **Appendix 5**);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (more details on which can be found at **Appendix 5**);

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The College recognises that:

- children with special educational needs and disabilities are three times more likely to be abused than their peers;
- whilst it is more likely that girls will be the victims, and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.

All children involved (alleged perpetrator(s) and victim(s)) will be treated as 'at risk'. Through the pastoral system, support will be given to victims of child-on-child abuse, the perpetrator, and any other child affected as deemed necessary. This may include a recommendation to see the College counsellors or contact with external agencies as appropriate.

To minimise the risk of child-on-child abuse, the College:

- ensures all pupils understand the College's approach to child-on-child abuse, are clear about the part they can play to prevent bullying and what they should do if they become aware of bullying;
- assures pupils that if they report child-on-child abuse they will be listened to, and their concerns taken seriously;
- teaches pupils about issues of difference (such as religion, ethnicity, disability, gender or sexuality) in lessons and assemblies and through dedicated events or projects;
- teaches pupils about online safety, safe use of social media and cyber-bullying through the Wellbeing programme, assemblies and the programme of visiting speakers;
- teaches pupils about the importance of voicing concerns related to child-on-child abuse, unequivocal facts about consent, and their responsibility as upstanders to report child-on-child abuse of any nature and that they must not be a bystander;

- applies disciplinary measures to pupils who commit acts of child-on-child abuse, in order to show clearly that their behaviour is wrong, such measures being applied fairly, proportionately, consistently and reasonably (taking account of any special educational needs or disabilities that the pupils may have);

- takes into consideration the motivations behind such behaviour and recognises that a child engaging in child-on-child abuse may need support themselves;

- involves parents to ensure that they are clear that the College does not tolerate child-on-child abuse and are aware of the procedures to follow if they believe that their child is being abused in this way;

- provides effective staff training, so that all staff understand the principles and purpose of this policy, the College's legal responsibilities regarding child-on-child abuse, how to resolve problems, and where to seek support; and

- regularly evaluates and updates its approach to take account of developments in technology, for instance updating 'acceptable use' and online safety policies.

Allegations of child-on-child abuse will be recorded, investigated and dealt with in accordance with the College's *Anti-Bullying* and (as applicable) *Sharing Nudes and Semi-Nudes policies*. If the matter(s) concern sexual violence and/or sexual harassment, this will be dealt with in according with the procedures set out in **Appendix 5** of this policy.

The initial response to a report of child-on-child abuse from a child is important, both for the victim and alleged perpetrator. Where appropriate, the College liaises with other agencies (including the police) after an allegation has been made (including by way of support to the relevant parties).

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. The College recognises the impact of domestic abuse on children (as victims in their own right) if they see, hear or experience domestic abuse. Types of domestic abuse include: intimate-partner violence; abuse by family members; teenage-relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background. Domestic abuse can take place inside or outside of the home.

Experiencing or witnessing domestic abuse and/or violence can have a serious and long lasting emotional and psychological impact on children, their health, wellbeing, development and ability to learn. 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'. Wherever there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

If a pupil discloses that they have witnessed or experienced domestic abuse or if it is suspected that they may be living in a household or in a relationship which is affected by violence, this should be immediately referred to the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) as a safeguarding issue.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of College can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. The College ensures that it works closely with the relevant authorities and parents regarding community safety and supports pupils in learning how to keep themselves safe.

Children who are absent from education

Children being absent from education, for prolonged periods and/or on repeat occasions, can be a vital warning sign of a range of safeguarding problems. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent from education in future.

It is recognised that being absent from education increases the known safeguarding risks within the family or in the community in relation to children already known to be at risk (eg including a child who is a child in need or who has a child protection plan, or is a looked-after child).

The College monitors pupil attendance, contacts home in cases of unauthorised absence and takes further action where appropriate.

The College has put in place appropriate safeguarding responses to pupils who are absent from school, particularly on repeat occasions and/or prolonged periods, to help identify any risk of abuse and neglect and to help prevent the risks of their going missing in future. (The College's various *Attendance and Registration policies* are available on the College website.)

The College has due regard to the guidance *Children missing education* published by the Department for Education in September 2024 and follows the relevant local authority procedures when pupils leave the College, particularly at non-standard transition points.

Child sexual exploitation and child criminal exploitation (including county lines)

Both CSE and CCE are forms of abuse and both that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. Whilst age may be the most obvious imbalance, a power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants (e.g. financial benefit or increased status).

The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by and/or through violence or the threat of violence.

Victims can be exploited even when activity appears consensual.

CSE and CCE can affect both male and female children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.

It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities.

A victim of CSE may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact: it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any person under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex);
- can still be abuse even if the sexual activity appears consensual;

- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both; and
- can occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

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

Child criminal exploitation (CCE)

CCE includes children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, committing vehicle crime or threatening/ committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

College staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. They also recognise that that both boys (and girls) being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional wellbeing;
- 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

County lines is a term used to describe gangs and organised criminal networks involved in the sale and distribution of illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further education institutions, pupil referral units, children's homes and care homes.

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

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

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

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. Cybercrimes include: unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades or making, or supplying or obtaining malware (malicious software) such as viruses with the intent to commit further offences. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

The College will monitor risks as they are highlighted, and the Deputy Master Pastoral & Co-Curricular will seek support from alternative programmes/services accordingly.

Serious violence

All College staff should be aware of the potential indicators that a child may be at risk from or involved with serious violent crime. These include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or significant change in wellbeing;
- signs of assault or unexplained injuries; or
- unexplained gifts or new possessions (which could also indicate that children have been approached by, or are involved with, criminal networks or gangs).

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Weapons

The College is aware that fear and a need for self-protection is a key motivation for children to carry a weapon, and that neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. College staff will share any concerns about or knowledge of such children immediately with the Deputy Master Pastoral & Co-Curricular.

Further advice is available in the Home Office document *Preventing youth violence and gang involvement*.

Preventing radicalisation

Children may be susceptible vulnerable to radicalisation into terrorism. Protecting children from this risk is an important part of the College's safeguarding of its pupils.

Extremism is the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, College staff should be alert to changes in pupils' behaviour, which could indicate that they may be in need of help or protection.

The *Counter-Terrorism and Security Act 2015* places a duty on schools to have due regard to the need to prevent people from being becoming terrorists or supporting terrorism ('the Prevent duty'). Young people can be exposed to extremist influences or prejudiced views (in particular via the internet and other social media) and schools can help to protect children from them.

The College:

- communicates and promotes the importance of the Prevent duty to staff.
- provides training to enable staff: (a) to recognise the engagement, intent and capability factors which indicate that a person may be vulnerable to being drawn into terrorism or at risk of radicalisation (including changes in a pupil's behaviour); (b) to challenge extremist ideas which can be used to legitimise terrorism; and (c) to know when and how to make a referral to the relevant agencies.
- builds pupils' resilience to radicalisation by: (a) promoting their spiritual, moral, social and cultural development; (b) by promoting democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths; and (c) helping pupils to acquire the knowledge, skills and understanding that they need to play a full and active part in society.
- teaches pupils about online safety and the safe use of social media; manages internet access; and ensures that there are suitable filtering and monitoring arrangements in place on College devices and networks.
- provides a broad curriculum and ensures that pupils are offered a balanced presentation of opposing views in relation to political issues.
- ensures that visiting speakers are suitable and that they are appropriately supervised when at the College through the implementation of its *Visiting Speaker Policy*.
- assesses the risk of its pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- works in partnership with the police, local authorities and other agencies involved with the implementation of the Prevent strategy.

- engages effectively with parents (including assisting and advising parents who raise concerns).
- acknowledges its responsibility to act proportionately.
- where appropriate, makes a referral to the Channel Programme (to provide support at an early stage to those who are identified as being vulnerable to being drawn into terrorism and a representative from the College may be asked to attend the Channel panel to help with this assessment).

'Honour-based' abuse (including female genital mutilation and forced marriage)

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

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead). As appropriate, the Deputy Master Pastoral & Co-Curricular will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and local authority children's social care.

Female genital mutilation (FGM)

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

The College recognises that teachers have a specific legal duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. **The teacher must personally report it to the police.** DUCKS staff receive training on FGM as part of their safeguarding training.

Whilst it will be rare for teachers to see visual evidence, and they should not be examining pupils: the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has good reason not to, they should still consider and discuss any such case with the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (ie where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage

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

The College recognises that it can play an important role in safeguarding children from forced marriage, and notes that, 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.

Appendix 8: Handling concerns and disclosures

Dealing with a disclosure (advice for staff)

If a pupil makes a disclosure, staff should:

- listen calmly and patiently;
- take the matter seriously and reassure the child;
- tell the pupil what will happen next;
- not promise to keep the alleged abuse secret or confidential;
- record the information at the time or as soon as possible afterwards;
- explain the information will have to be passed on;
- not ask leading or closed questions;
- not judge or condemn the alleged abuser;
- not assume know how the child feels;
- never think it can't happen here.

The information should then be passed to the Deputy Master Pastoral & Co-Curricular, or, in their absence, any Deputy Designated Safeguarding Lead, without any delay. Staff should email safeguarding@dulwich.org.uk.

More guidance on receiving a report of sexual violence or harassment is set out in **Appendix 5**.

Appendix 9: Making a referral

The Southwark Multi-Agency Safeguarding Hub has adopted the London Safeguarding Children Partnership (LSCP) Threshold Document, which provides a framework to help identify when a child may need safeguarding or additional support in order to achieve their full potential. It introduces a continuum of help and support, which provides information on levels of risks and need and gives examples of some of the factors that may indicate a child or young person needs additional support. The London Threshold - Continuum of Need Matrix within the Threshold Document provides examples that the College uses as a tool to assist assessment, planning and decision making in safeguarding pupils and promoting their welfare of children. The College recognises, however, that this is not an exhaustive list.

Early help assessment

If early help is appropriate, the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) will generally lead on liaising with other agencies and setting up an inter-agency assessment as necessary. College 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 local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Statutory children's social care assessments and services

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Local authority children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the College is able to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Children in need

A child in need is defined under the *Children Act 1989* as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 of the *Children Act 1989*.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under Section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action

to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation.

What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required.

This will include determining whether:

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

Further details can be found in chapter one of *Working together to safeguard children*.

The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, College staff should do everything they can to support that assessment (supported by the Deputy Master Pastoral & Co-Curricular or a Deputy Designated Safeguarding Lead as required).

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. The Southwark Safeguarding Children Partnership's escalation policy is available on their website.

College procedures

Any person who has concerns regarding a child may make a referral direct to the local authority children's social care (including any parent, pupil or member of staff). The contact details of the team at Southwark's local authority children's social care are set out at the start of this policy, along with a link to safeguarding contacts at other local authorities.

When an individual concern/incident is brought to the notice of the Deputy Master Pastoral & Co-Curricular, they will decide whether or not this should be reported to local authority children's social care as a safeguarding issue. Where a referral is made to local authority children's social care by a member of staff,

the Deputy Master Pastoral & Co-Curricular should be informed, as soon as possible, that a referral has been made.

There must be an immediate referral to local authority children's social care and (if appropriate) the police whenever a child is at risk i.e. they have suffered or are likely to suffer significant harm and/or there are concerns about maltreatment (including all forms of abuse and neglect, FGM, honour-based abuse, radicalisation and sexual exploitation). The referral should be followed up if the local authority does not offer a response within one working day.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the referral process should not delay the administration of first aid or emergency medical assistance.

Procedures in the event of allegations or concerns in respect of staff (including supply staff, volunteers and contractors) and where referrals are required are set out in **Appendix 6**.

Local authority children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that as much information as possible is provided as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves for example alleged or suspected sexual abuse, honour-based abuse, fabricated or induced illness or the Deputy Master Pastoral & Co-Curricular has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

In the case of abuse by one or more pupils against another pupil, there should be a referral to local authority children's social care where there is reasonable cause to suspect that a pupil is suffering or likely to suffer significant harm. In such cases, all the children involved (whether perpetrator or victim) should be treated as at risk. **Appendix 5** of this policy and the College's and DUCKS *Anti-Bullying policies* include further details.

Appendix 10: Management of specific safeguarding scenarios

Boarding

The boarding environment presents additional factors to consider with regards to safeguarding that need careful consideration including:

- the College's approach to child-on-child abuse reflecting the risks associated with children sharing overnight accommodation;
- sexual relationships between children;
- concerns regarding educational guardianship arrangements;
- access to staff residential accommodation;
- use of mobile devices in boarding facilities.

The College has policies and procedures in place to manage particular safeguarding issues that can arise in relation to boarding provision, including:

- the *Safeguarding (Child Protection) Policy*;
- *Pupil Supervision policies*;
- *Online Safety Policy*;
- *ICT Acceptable Use Policy (Pupils)*; and
- boarding handbooks.

In particular, boarding rules, which are discussed with pupils in person at the start of the year and on an ongoing basis as required, make clear that:

- Sexual relations between pupils whilst at school are forbidden. Boarders' bedrooms are out of bounds to visitors and boarders should only entertain guests in the downstairs communal areas of the house. All persons visiting the boarding houses must sign in and out and are appropriately supervised.
- No other pupil or visitor should be in a boarder's room without the boarder's presence or explicit consent. Ultimately, all pupils are encouraged and enabled to make and sustain respectful friendships within and outside the boarding community.

Senior boarding staff have undertaken appropriate training in those additional factors within the management of boarding and are knowledgeable and experienced in ensuring the welfare of boarding pupils. However, boarders are able to approach any member of staff with issues or concerns.

All boarding pupils are given the details of persons they can contact directly about personal problems or concerns at school (including how they may be contacted). This also includes appropriate agency helplines and outside contact numbers. Furthermore, staff will identify those who would benefit from the support of an advocate with regards to supporting their wellbeing and raising concerns.

Overseas pupils

The College has additional safeguarding responsibilities as a registered sponsor for overseas students with the UK's Home Office. In particular the College:

- is proactive in monitoring pupil attendance (in accordance with the relevant *Attendance policies*), reporting any issues of consistent non-attendance and ceasing to sponsor pupils who continue not to meet attendance requirements;
- maintains oversight of boarders' movements at the end of term, exeats etc; and
- implements its *Guardian Policy* and acts immediately in respect of any concerns about an educational guardianship arrangement.

Restrictive interventions

The College recognises that the use of restrictive interventions, including reasonable force and seclusion, can have a significant impact on the pupils, staff members of and parents involved, as well as the wider classroom. A number of measures are adopted to minimise the need to use restrictive interventions; however, the College also recognises that there will be times when the use of restrictive interventions will be lawful and necessary; for example, to keep individuals and the wider school community safe.

The College has a *Restrictive Interventions* policy which aims to help members of staff to minimise the need to use interventions through early support, prevention and de-escalation strategies, and when necessary, to help members of staff to feel more confident in knowing how to use restrictive interventions, including reasonable force and seclusion, safely, appropriately and lawfully. This is covered in the College's safeguarding training for all staff.

Children potentially at greater risk of harm

Whilst all children should be protected, the College acknowledges that some groups of children, are potentially at greater risk of harm than others (both online and offline) and these may include:

Children being supported by a social worker

- 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.
- A pupil may need support from a social worker owing to their safeguarding or welfare needs. Local authorities should share the fact that a pupil has a social worker with the College. The Deputy Master Pastoral & Co-Curricular holds this information so that decisions can be made in the best interests of

the child's safety, welfare and educational outcomes. Where a child has a social worker, this informs 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).

- Particular vigilance is exercised in respect of pupils who are subject to a child protection plan and any incidents or concerns involving these pupils will be reported immediately to the allocated social worker.

Looked-after or previously looked-after children (care leavers)

- In the case of a looked-after child, the College works with the virtual school head at the local authority to discuss how the needs identified in the child's personal education plan can be met, and their progress supported. The College also works with the virtual school head to promote the educational achievement of previously looked after children. The Deputy Master Pastoral & Co-Curricular is the designated teacher responsible for promoting the educational achievement of registered pupils who are looked after.

- Appropriate staff have the information they need in relation to a child's looked-after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Appropriate staff also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

- A previously looked-after child (care leaver) potentially remains vulnerable, that all staff should have the skills, knowledge and understanding to keep previously looked-after children safe and that it is essential to work with other agencies to ensure that prompt action is taken when necessary to safeguard these children.

Children with special educational needs and disabilities or health issues

- Pupils with special educational needs or disabilities or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, and additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with special educational needs and disabilities or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges; cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviour in school, or the consequences of doing so).

- The College recognises that any reports of abuse involving children with special educational needs and disabilities will require close liaison with the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead) and the College's Learning Support Department.

Children requiring mental health support

- All staff should be aware that the College recognises that it has an important role to play in supporting the mental health and wellbeing of all pupils and that in some cases mental-health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental-health problem, College staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

- The College accesses a range of sources of support to help identify pupils in need of extra mental health support, including working with external agencies.

- In accordance with the College's *Mental Health Policy*, if staff have a mental health concern about a child who is also a safeguarding concern, immediate action should be taken by speaking to the Deputy Master Pastoral & Co-Curricular (or a Deputy Designated Safeguarding Lead).

Children who are lesbian, gay, bisexual or gender-questioning

- The fact that a child or a young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

    - The College recognises that the Cass Review identified that caution is necessary for children questioning their gender: there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

    - When families are making decisions about support for gender questioning children, the College will encourage them to seek clinical help and advice. When parents are supporting pre-pubertal children, the College will work with clinical services to ensure that they can be seen as early as possible by a clinical professional with relevant experience.

- As such, when supporting a gender questioning child, the College adopts a cautious approach and considers the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

- Risks can be compounded where children who are lesbian, gay, bisexual or gender-questioning lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Private fostering

This occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them or a relative in their own home. Where the arrangements come to the attention of the College (and the College is not involved in the arrangements), the relevant local authority will be notified to allow them to check the arrangement is suitable and safe for the child. Where the College is involved (whether or not directly) in arranging for a child to be fostered privately, the relevant local authority will be notified of the arrangement as soon as possible after the arrangement has been made. The College understands that notifications must contain the information specified in Schedule 1 of the *Children (private arrangements for fostering) regulations 2005* and must be made in writing.

Educational visits (outings and expeditions)

The Safeguarding Manager meets with all expedition leaders to ensure that pupils' individual needs can be met as part of a risk-assessed approach. All pupils are spoken to regarding safeguarding during educational visits (outings and expeditions). All pupils are issued with a safeguarding card and the contact numbers of staff should safeguarding issues arise. The safeguarding email address (safeguarding@dulwich.org.uk) is monitored at all times. All appropriate safeguarding checks are made both at home and abroad according to local law. The College's *Educational Visits (Outings and Expeditions) Policy* can be found on the College website.

Security

The College has a visitor policy that addresses the threat of unauthorised intrusion by outsiders and the risk to pupils, staff and property. Entry to College premises is controlled by doors and gates that are secured physically or by staff supervision or video surveillance. Authorised visitors to the College are logged into and out of the premises and asked to wear their identity badges or issued with College visitor badges. Unidentified visitors should be challenged by staff and reported to Security (07860648965).

Other College activities

Other activities are undertaken on or around the College, primarily through its operating subsidiary Dulwich College Enterprises Limited (DCE), and in relation to which the following safeguarding procedures are implemented accordingly:

Hirers

When services or activities are provided by the College, under the direct supervision or management of College staff, the College's safeguarding arrangements will apply. However, where College facilities/premises are hired or rented out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the College seeks evidence and contractual assurances (as applicable) regarding safeguarding procedures in place by those organisations. Hirers will be given contact details for the Deputy Master Pastoral & Co-Curricular and are required to notify the Deputy Master Pastoral & Co-Curricular of any safeguarding incident. Compliance with safeguarding obligations is a condition of the use and occupation of the College and failure comply will result in a termination of any hire agreement. When considering the safeguarding arrangements any hirers have in place DCE will have regard to the Department for Education's non-statutory guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers)*. If the College receives an allegation relating to an incident that happens when the premises are hired out, then the College will follow its safeguarding procedures.

Dulwich College Sports Club

DCE operates the membership Sports Club. The Club has a standalone *Safeguarding (Child Protection) Policy* that provides that any safeguarding incidents will be referred to the College. For the purposes of Dulwich College pupils, the Club is treated as if it were a third-party sports club and appropriate safeguarding protocols are in place for use of the Sports Club, both during the day (when members have only limited access) and by boarding pupils outside the normal school day (when it is in full operation for its members). The Sports Club has its own Designated Safeguarding Lead.

Foundations Schools' Coach Service (FSCS)

DCE operates the FSCS which is used by pupils from Dulwich College, James Allen's Girls' School, Dulwich Prep and Senior and Alleyn's School. The operation has a standalone *Safeguarding (Child Protection) Policy* which provides that any safeguarding incidents will be referred to the College. The Foundation Schools' Coach Service has its own Designated Safeguarding Lead.

Doors

All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

First aid

- Except in cases of emergency, first aid will only be administered by qualified first-aiders.
- All first aid treatment will be recorded and where significant will be shared with parents/carers at the earliest opportunity.
- If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.
- If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot.
- All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Appendix 11: The role of the Designated Safeguarding Lead, the Board of Governors, and the Safeguarding Governor

As the Designated Safeguarding Lead for the whole College, the Deputy Master Pastoral & Co-Curricular has lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This involves:

- ensuring this policy is known and used appropriately;
- ensuring that all staff are aware of this policy, have read all necessary documentation and have received all necessary training;
- ensuring this policy is available publicly and parents are aware of the fact that referrals about suspected abuse, exploitation or neglect may be made;
- acting as a source of support, advice and expertise to staff on matters of safeguarding;
- ensuring safeguarding is regularly on the agenda for College staff meetings and Governors' board meetings (the Deputy Master Pastoral & Co-Curricular provides all necessary information and makes a report/provides an update at such meetings as required);
- taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues (including online safety) that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college (including: (a) ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and (b) supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes);
- ensuring there is a regular review of current safeguarding cases;
- leading on liaising with external agencies;
- referring cases where a crime may have been committed to the police (drawing on guidance published by the National Police Chiefs' Council);
- liaising with the Master to inform them of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- liaising with staff (especially the pastoral team, the Medical Centre, the Learning Support Department and the Online Safety Officer) on matters of safety and safeguarding (including online

and digital safety) and when deciding whether to make a referral by liaising with the relevant agencies so that children's needs are considered holistically;

- liaising with the Medical Centre where safeguarding concerns are linked to mental health;
- promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- being the first point of contact for external agencies assessing or reviewing safeguarding cases, and co-ordinates the College's representation at review meetings and conferences;
- maintaining links with the Southwark Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- ensuring the College discharges its obligations in relation to the Prevent Duty under the *Counter-Terrorism and Security Act 2015*, is the main point of contact for parents, pupils, staff and external agencies in all matters relating to Prevent, arranges suitable training for staff and refers cases to the Channel programme where there is a radicalisation concern;
- ensuring this policy and the effectiveness of all child protection procedures are reviewed annually by the Board of Governors;
- providing a termly report to the Governors' Safeguarding Committee (which is also shared with the Board of Governors), outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.
- ensuring that safeguarding/child protection files are kept up to date when a pupil leave, that they are transferred to the new school as soon as possible, and within the required timescales;
- making a referral to the Disclosure & Barring Service cases where a person is dismissed or has left owing to risk/harm to a child;
- as directed by the Master, serving as the 'case manager' and liaising with the designated officer at the local authority (the LADO) where there are child protection issues in relation to a staff member other than themself.

Some of the Deputy Master Pastoral & Co-Curricular's activities may be delegated to the Deputy Designated Safeguarding Leads from time to time and they are all trained to the same standard as the Deputy Master Pastoral & Co-Curricular.

The Governors' role is to:

- comply with their safeguarding duties under legislation and ensure that the policies, procedures and training in the College are effective and comply with the law at all times;

- ensure all Governors receive appropriate safeguarding and child protection (including online) training at induction and such training is regularly updated;
- ensure that the College contributes to inter-agency working in line with statutory guidance (including *Working together to safeguard children* and *Keeping children safe in education*);
- ensure that the College's safeguarding arrangements take into account the procedures and practice of Southwark as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership;
- ensure that pupils are taught about safeguarding (including on-line safety) and how to keep themselves and others safe;
- review how children are taught about safeguarding in Wellbeing lessons (including safe use of electronic equipment and access to the internet).
- ensure that the College has appropriate, regularly reviewed IT filtering systems in place, and that the leadership team are escalating concerns when identified in order to limit pupils' exposure to risks online;
- nominate a Safeguarding Governor to act as the lead Governor for child protection and safeguarding issues in the College; and
- review this Policy and the effectiveness of its implementation annually at a meeting of the Board of Governors.

The role of the Safeguarding Governor is to:

- be the lead Governor for child protection and safeguarding issues in the College;
- chair the Governors' Safeguarding Committee and reports to the Board of Governors on matters of safeguarding;
- meet with the Deputy Master Pastoral & Co-Curricular on a regular basis to monitor both the volume and progress of cases where a concern has been raised to ensure that the College is meeting its duties in respect of safeguarding;
- keep fully abreast of the guidance available for safeguarding;
- visit the College at least once a term to monitor the implementation of its procedures; and
- as directed by the Chair of Governors, liaise with Southwark and/or partner agencies on issues of child protection and allegations of abuse against the Master.

Policy Owner:	Deputy Master Pastoral & Co-Curricular
Last Reviewed:	April 2026
Date of Next Review:	As required (and no later than September 2026)