

CHILD PROTECTION AND SAFEGUARDING POLICY

Policy to be reviewed annually		
Reviewed by	Designated Lead for Safeguarding	September 2020
Approved by	Sandrine Paillasse (Head)	September 2020
Board Approval	Dr Sarah Kavanaugh	September 2020

To be published on	
School network	?
School website	?

KEY INTERNAL CONTACT DETAILS

The senior staff listed below have been fully trained in accordance with the requirements of statutory guidance and have the status and authority to take responsibility for child protection and safeguarding matters. The Designated Safeguarding Lead (DSL) will always be a member of the Senior Leadership Team (SLT).

Designated Safeguarding Lead	Rebecca Thomas, Assistant Head Pastoral	
and EYFS Designated Person	✓ PREVENT duty lead	
(DSL)	✓ Looked after children lead	
, ,	Ext:206	
	Rebecca.thomas@stchristophers.london	
Deputy Designated	Ella Schierenberg (Ext:229/	
Safeguarding Leads (DDSLs)	ella.schierenberg@stchristophers.london),	
	Stephanie Martineau (Ext: 203/	
	stephanie.martineau@stchristophers.london),	
	Sandrine Paillasse (Ext. 215/	
	sandrine.paillasse@stchristophers.london)	
Designated Safeguarding	Dr Sarah Kavanaugh (sarah.kavanaugh@stchristophers.london)	
Governor		
Chair of Governors	Nick Green (nick.green@stchristophers.london)	
Head	Sandrine Paillasse (Ext. 215/	
	sandrine.paillasse@stchristophers.london)	
Online Safety Coordinator	Jamie McKenzie (Ext. 209	
	jamie.mckenzie@stchristophers.london)	

KEY EXTERNAL CONTACT DETAILS

a) LOCAL AUTHORITY CHILD PROTECTION CONTACT DETAILS

LADO, Multi Agency Safeguarding Hub (MASH): 020 7974 3317 9am-5pm

LBCMASHadmin@camden.gov.uk/LBCMASHadmin@camden.gov.uk.cjsm.net_(secure email)

Emergency Duty Team (Out of hours):

Tel: 020 7974 4444

Child Protection Lead Officer and Local Authority Designated Officer (LADO):

Name: Sophie Kershaw

Deputy LADO: John Lawrence-Jones Contact details: 020 7974 4556

First Stop Early Help: Tel: 020 7974 8791

Camden Safeguarding Lead Officers:

Name: Michelle O'Regan (Head of Service - Children in Need)

Tel: 020 7974 1905

Name: Tracey Murphy (Service manager) Tel: 020 7974 4103 Name: Patricia Williams (Service manager) Tel: 020 7974 1558

Camden Children's Contact Service/MASH team:

Manager: Jade Green

Tel: 020 7974 1553/3317 Fax: 020 7974 3310

B) ADDITIONAL CONTACT DETAILS

Child Abuse Investigation Team (Holborn Police Station): 020 8733 6495/6507

Sapphire Unit Holborn Police Station: 020 8733 6490/6482

www.londonscb.gov.uk

Preventing Extremism in Schools and Children's Services

Tel: 020 7340 7264

Email: counter.extremism@education.gov.uk

Online Safety Contact Officer:

Name: Jenni Spencer Tel: 020 7974 2866

Prevent Education Officer Name: Jane Murphy Tel: 020 7974 1008

C) USEFUL CONTACTS

NSPCC Whistleblowing Advice Line	ADDRESS: Weston House
	42 Curtain Road
	London
	EC2A 3NH
	TEL: 0800 028 0285
	EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services
	PO Box 3961
	Royal Wootton Bassett
	SN4 4HF
	TEL: 03000 200 190
	EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct
	Ground Floor South
	Cheylesmore House
	5 Quinton Road
	Coventry CV1 2WT
	TEL: 0207 593 5393
	EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to
	6pm)
	EMAIL: Whistleblowing@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100
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	EMAIL: concerns@isi.net
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Support and Advice about Extremism	Department for Education
	NON EMERGENCY NUMBER: 020 7340 7264
	EMAIL: counter.extremism@education.gsi.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100
	EMAIL: concerns@isi.net

POLICY SCOPE

This policy applies equally to the Early Years Foundation Stage (EYFS) setting, Key Stage 1 and Key Stage 2 as taught at St Christopher's School. This policy is reviewed annually by the DSL Lead and in conjunction with the Designated Safeguarding Governor, before it is reviewed by the governing body.

For the purposes of this policy, the term "staff" refers to the Head, teachers, assistants, administration personnel, ancillary personnel, maintenance workers and caretakers.

POLICY STATEMENT

St Christopher's School is committed to safeguarding children and promoting their welfare, working to prevent abuse and neglect, protecting children from harm, identifying and reporting concerns about child abuse as required by statutory guidance.

This policy applies to St Christopher's School, which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum), and upon changes and recommendations. It is available on the School website or upon request.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2020) (KCSIE)
- Disqualification under the Childcare Act 2006 (August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (2018) (WT)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
- The Prevent Duty: Departmental advice for schools and child care providers (June 2015)
- The use of social media for online radicalisation (July 2015)
- The UN Convention on the Rights of the Child (1989) Article 19

This policy also takes into account the procedures and practice of the London Borough of Camden as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Partnerships, or LSCP (the three safeguarding partners: local authorities, chief officers of police, and clinical commissioning groups).

This policy should be read alongside the School's Covid-19 Safeguarding Addendum which sets out how this policy has been adapted to ensure appropriate regard to KCSIE during this time.

This policy takes into account other associated policies, including: behaviour, online safety, antibullying, whistleblowing, safer recruitment, PSHE, behaviour, the staff code of conduct, physical intervention, first aid, health and safety, acceptable use policy, educational visits, pupil supervision, EYFS, attendance and missing child. It also notes the visiting speaker procedure.

POLICY AIMS

- To inform staff so that they feel confident in identifying the needs of children and any specific harms to their wellbeing and safety
- To ensure staff understand the lines of reporting concerns about children or adults working or volunteering in the school, centred around a view that it 'could happen here.' They need to be able to verbalise and rationalise intuitions.
- To raise awareness of all school staff of the importance of safeguarding and child protection, and in particular to make clear responsibilities for identifying and reporting actual or suspected abuse. In effect, <u>safeguarding is 'everyone's responsibility'</u>;
- To ensure pupils, parents, volunteers, prospective employees and visitors are aware that the school takes child protection seriously and will follow school and local authority procedures for identifying and reporting abuse and for dealing with allegations against staff;
- To promote effective liaison with other agencies in order to work together for the protection and welfare of all pupils this includes children's services, the LADO, police and other support agencies such as healthcare;
- To support pupils' development in ways which will foster security, confidence and independence;
- To take a child-centred and co-ordinated approach by integrating a child safeguarding curriculum within the existing curriculum, allowing for continuity and progress through all the key stages;
- To make appropriate links and reference to policies in related areas such as discipline and bullying and prevention of radicalisation.

POLICY APPLICATION AND SHARING

The school aims to create an ethos where children and parents feel valued, listened to and are understood. Children are made aware that their happiness and safety are important, and parents informed of this.

The school is committed to ensuring that all staff and volunteers receive training on child protection, including the school's safeguarding policy and associated policies listed above. They are also trained and kept aware of the identity of the DSL and DDSL, given a copy of Part One of KCSIE (2020) complete with Annex A for all leaders and staff in direct contact with pupils. All staff receive formal safeguarding and child protection training at least every two years, as well as regular safeguarding updates particularly noting those published by DfE or the local authority from the DSL. There is a compulsory safeguarding induction for all newly appointed staff and volunteers.

The governors and the school comply fully with safer recruitment systems and procedures and those involved in recruitment of staff are also made aware of the safer recruitment procedures and receive training for this. The school takes due consideration of the Disqualification from Working in Childcare arrangements as outlined in the Childcare Act 2006.

The school also operates within the child protection policies of Camden Safeguarding Children Partnership as part of the inter-agency safeguarding procedures set up by the three safeguarding partners.

POLICY DOCUMENTS

The school notes the following documents as critical in its approach to safeguarding and useful sources of information:

Keeping Children Safe in Education, September 2020 including supplementary advice on: Information for all school and college staff	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf	
Pan-London Child Protection Procedures (October 2015)	http://www.londoncp.co.uk/	
Revised Prevent guidance for England and Wales (2019)	https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales	
Working Together to Safeguard Children, 2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf	
Part 8 (c) Independent School Standards Regulations 2014 – active promotion of pupil wellbeing within the meaning of Section 10(2) Children Act 2004(a)	The Government's aim is for every child, whatever their background or their circumstances, to have the support they need to: Be healthy Stay safe Enjoy and achieve through learning Make a positive contribution to society Achieve economic well-being	
Children Act 1989 and 2004	Section 11 of the Children Act 2004 creates a duty for the key agencies to work with children to put in place arrangements to make sure that they take account of the need to safeguard and promote the welfare of children when doing their jobs. The Children Act 1989 Section I (i) specifically identifies: "the child's welfare shall beparamount consideration" Section 31 (9) as amended by the Adoption and Children Act 2002, regarding "significant harm" reads: "Where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared to that which would be reasonably expected of a similar child". " 'harm' " means ill treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill treatment of another"	

"'development' means physical, intellectual, emotional, social or behavioural development" " 'health' means physical or mental health: and 'ill treatment' includes emotional abuse, neglect, physical and sexual abuse" (The same definitions of 'development' and 'health' are applicable in Section 17, below) Section 17 (1) places a general duty on the Local Authority: "To safeguard and promote the welfare of children within their area who are in need: and so far as it is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children's needs". The term "Children in Need" is defined in the Children Act 1989 (section 17 (10)): A child shall be taken to be in need if a) He/she is unlikely to achieve or maintain or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of service by local authority under this part: His/her health or development is likely to be significantly b) impaired, or further impaired without the provision for him/her of such services: c) He/she is disabled Investigation – Section 47 "Where a local authority (Social Services Department) have reasonable cause to suspect that a child who lives...in their area is suffering or is likely to suffer significant harm the authority shall make or cause to be made such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare". Children Act 1989 Section 47 (1) (b) Duty to assist: "Where (Social Services) are conducting enquiries (s 47) it shall be the duty of any person (from the Education Authority) to assist them with those enquiries in particular by providing relevant information and advice if called upon by (Social Services) to do so". Child Care Act 2006 http://www.legislation.gov.uk/ukpga/2006/21/pdfs/ukpga 20060021 en.pdf

Early Years Foundation Stage, 2017	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf
Education Act 2002, Section 175	http://www.legislation.gov.uk/ukpga/2002/32/pdfs/ukpga_20020032_en.pdf
Education and Inspections Act 2006	http://www.legislation.gov.uk/ukpga/2006/40/pdfs/ukpga_20060040_en.pdf
What to do if you are worried a child is being abused 2015	https://www.gov.uk/government/uploads/system/uploads/attachment _data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_a bused.pdf
Common Assessment Framework for Camden 2020	https://www.camden.gov.uk/early-help-for-children-and-families#engw
Munro Review of Child Protection	https://www.education.gov.uk/publications/standard/publicationDetail/Page1/CM%208062
Education Act 2011	http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted
Children Missing in Education, Statutory Guidance for Local Authorities September 2016	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Educationstatutory_guidance.pdf
Disqualification under the Childcare Act 2006 (September 2018)	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006
What to do if you're worried a child is being abused - WT (March 2015)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
The use of social media for on- line radicalization (July 2015)	https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation
Relationships education, relationships and sex education (RSE) and health education (June 2019)	https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
Sexual violence and harassment between children in schools and colleges (May 2018)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

SAFEGUARDING AND CHILD PROTECTION DEFINITION

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development;

ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes in order to be safe and happy.

Child protection is an area within the broader concept of safeguarding, which entails protecting children from actual abuse or from the risk of abuse.

RESPONSIBILITY OF ALL STAFF, GOVERNORS AND VOLUNTEERS

Every employee as well as volunteers and governors who assist the school, is under a general legal duty to:

- protect children from abuse;
- be able to identify welfare concerns amongst the pupils and to be able to identify pupils who are in need of additional support;
- be aware of the school's child protection procedures and to follow them;
- know how to access and implement the procedures, independently if necessary
- keep an accurate record of any significant complaint, conversation or event; and
- report any matters of concern to the DSL.
 - be aware that the use of technology may present a potential risk to members of the community (e.g. child sexual exploitation; radicalisation).
 - Be familiar with all the associate policies listed here:
 - the safeguarding and child protection policy;
 - the role and identity of the DSL(s) and any DDSLs
 - the behaviour policy
 - the staff code of conduct
 - the school's whistleblowing procedure
 - the online safety policy
 - the acceptable use policy
 - a copy of part one of KCSIE
 - school leaders and staff who work directly with children will also be required to read Annex A of KCSIF
 - Teaching staff and teaching assistants and those involved in pupil collection/registration should also be familiar with attendance policy and missing child procedure.

In addition, all teachers and staff are mandated to notify the DSL of:

- any conduct that they suspect may be inappropriate (whether in isolation, or as part of a pattern); unsupervised access to a child in changing, sleeping in non-public accommodation at the school or on school trips;
- the use of sexually inappropriate language, references or jokes;
- other private communication outside of the school's defined social and social media policies.

CHILD PROTECTION: TYPES AND SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Abuse may be caused by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting. When harm is carried out by a person, it may be by those known to them or, more rarely, by others. It may

be carried out by adults as well as children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;
- child criminal exploitation (CCE); more details below
- child sexual exploitation (CSE). More details below

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

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

Indicators may include:

- unexplained injuries or burns, particularly if they are recurrent
- improbable excuses given to explain injuries
- refusal to discuss injuries
- untreated injuries
- admission of punishment which appears excessive
- fear of parents being contacted
- bald patches
- withdrawal from physical contact
- arms and legs kept covered in hot weather
- fear of returning home
- fear of medical help
- self-destructive tendencies
- aggression towards others
- chronic running away

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

Indicators may include:

- physical, mental and emotional development lags
- admission of punishment which appears excessive
- over-reaction to mistakes
- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking. hair-twisting; thumb-sucking)
- self-mutilation
- fear of parents being contacted
- extreme of passivity or aggression
- drug/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Indicators may include:

<u>Possible signs of sexual abuse in children under the age of five:</u>

- become insecure or cling to parent in a fearful way
- show extreme fear of a particular person
- cry hysterically when their nappy is changed
- become hysterical when clothing is removed, particularly underclothes
- have some physical signs in the genital or anal areas: smell of semen etc

- have soreness or bleeding in the throat, anal or genital areas
- regress to a much younger behavioural pattern
- behave in a way sexually inappropriate to their age, being obsessed with sexual matters as opposed to normal exploration
- stare blankly, seem unhappy, confused, sad
- become withdrawn. Stop eating, have chronic nightmares, begin wetting again when previously dry
- play out sexual acts in too knowledgeable a way with dolls or other children
- produce drawings of sex organs
- stop enjoying activities with other children, such as stories or games
- seem to be bothered or worried, but won't tell why as if keeping a secret
- change from being happy and active to being withdrawn and fearful
- repeat obscene words or phrases said by the abuser
- say repeatedly that they are bad, dirty or wicked
- become aggressive and hurtful
- act in a sexually inappropriate way towards adults

<u>Possible signs of sexual abuse in children from the ages of five to twelve:</u>

- hint about secrets they cannot tell
- say that a friend has a problem
- ask you if you will keep a secret if they tell you something
- begin lying, stealing, blatantly cheating in the hope of being caught
- have unexplained sources of money
- have terrifying dreams
- start wetting themselves
- exhibit sudden inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- stop enjoying previously liked activities, such as music, sports, art, scouts or guides, going to summer camp, gym club
- be reluctant to undress for gym
- become fearful of or refuse to see certain adults for no apparent reason; show dislike of a particular babysitter, relative or other adult
- act in a sexual way inappropriate to their age
- draw sexually explicit pictures depicting some act of abuse
- seem to be keeping secret something which is worrying them
- have urinary infections, bleeding or soreness in the genital or anal areas
- have soreness or bleeding in the throat
- have chronic ailments, such as stomach pains or headaches
- take over the parent role at home, seem old beyond their years (if a victim of incest)
- develop eating disorders, such as anorexia or bulimia
- become severely depressed. even attempt suicide
- have a poor self-image, self-mutilate
- continually run away
- be suicidal

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or

abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators may include:

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- emaciation
- frequent lateness or non-attendance at school
- untreated medical problems
- destructive tendencies
- low self-esteem
- neurotic behaviour (eg rocking. hair-twisting; thumb-sucking)
- no social relationships
- chronic running away
- compulsive stealing
- scavenging for food or clothes

CHILD PROTECTION: SPECIFIC AREAS

The following areas are covered in depth in KCSIE Annex A. Specific points relevant to the school's context or procedural requirements are elaborated on below:

a) Children and the Court System

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

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

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

b) Children Missing from Education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The school's procedures for unauthorised absence and for dealing with children who go missing from education are outlined in the school's attendance policy and missing child procedure.

c) Children with Family Members in Prison

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

d) Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

CCE may also include gangs. A gang is defined as a group of young people who spend time together, often fighting other groups or involved in anti-social behaviour. Youth violence refers to harmful behaviours that can start early and continue into adulthood. The young person can be a victim, an offender, or witness the violence. Youth violence includes various behaviours including some violent acts such as bullying, slapping or hitting. These behaviours can cause more emotional harm than physical harm. Others, such as robbery and assault (with or without weapons) can lead to serious injury or even death.

Some of the following can be indicators of CCE. All staff should be aware of the associated risks and understand the measures in place to manage these:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.
- children whose performance significantly declines
- children who self-harm
- children with a significant change in wellbeing
- children with signs of assault or unexplained injuries.
- a change in friendships or relationships with older individuals or groups

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

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

e) Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and

non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE is a form of child abuse that is often hidden from sight, difficult to identify, and harder still to stop. Sexual exploitation may take one of the following forms, but the model of exploitation may change over time: *Inappropriate relationships* where the young person enters a relationship with an older partner who exerts a great deal of influence and control over them due to an imbalance of power. *Peer exploitation* where young person by another young person with whom they have a relationship and who subsequently coerces them into sexual activity with their friends. *Organised exploitation*: This involves networks of perpetrators grooming young people for coercion into sexual activity with different people and perhaps using the victims to recruit others.

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

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

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners. If you believe a child is in immediate danger, call the police on 999. If you would like to report any concerns, contact Crimestoppers on 0800 555 111, or The NSPCC Child protection helpline gives information, advice and counselling to anyone worried about a child. Tel: 0808 800 5000.

f) County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

g) Domestic Abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

Young people living with domestic or sexual violence may be at risk. **English National Domestic Violence Helpline**: 0808 2000 247 www.nationaldomesticviolencehelpline.org.uk

h) Homelessness

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

So-called Honour-based Abuse (including Female Genital Mutilation, FGM, and Forced Marriage)

This encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing.

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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is a cultural practice that involves a procedure to remove part or all of a young girl's genital organs. UK law forbids this practice, which can be found mainly among communities from sub-Saharan Africa, the Middle East and Asia. The average age tends to be 10-12 years. Staff should be aware of family plans to take girls out of the UK for an unexplained, prolonged period.

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.¹⁷⁷

There is a statutory duty on teachers to personally report to the police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence, teachers should follow the school's local safeguarding procedures.

What staff should do if they have a concern that FGM has taken place or a pupil may be at risk:

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL. Staff should also contact the FGM helpline on 0800 028 3550 or email fgmhelp@nspcc.org.uk

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

j) Preventing Radicalisation, the Prevent Duty and Channel

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should

contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

What staff should do if a child is seen as at risk of radicalisation:

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 immediately as well as inform MASH and the DSL.

The school, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL, DDSLs and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

k) Peer-on-Peer/Child on Child Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse.)

This is most likely to include, but is not limited to:

- bullying (including cyberbullying);
- abuse within intimate partner relationships
- Physical abuse;
- Sexual abuse;
- Harmful sexual behaviours including sexual violence, assault and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting;
- Gender-based issues
- Initiation/hazing type violence and rituals.

The gendered nature of peer on peer abuse is recognised (it is likely that girls will be victims and boys perpetrators) but all peer-on-peer abuse is unacceptable and will be taken seriously. Staff must be aware that children may be abused out of school, but should not minimise the potential risks of girl-on-girl abuse.

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

How staff should deal with peer-on-peer allegations:

Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys."

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The school recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children.

The school takes the following steps to minimise the risk of peer-on-peer abuse: by instilling a culture of tolerance and respect, regular PSHE sessions and circle time, anti-bullying within the curriculum, pastoral support and monitoring, and strong communication between home and school.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the school's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the three safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the three safeguarding partners including the police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The school's approach to sexting is that staff will ensure they do not view any images themselves/seek support from the DSL in the event an allegation is made.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims and perpetrators will be supported through a programme of pastoral care and support from external agencies will be sought, as appropriate.

1) Sexual Violence/Harassment Between Children

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

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the school.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel

ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

m) Upskirting

This is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

n) Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (July 2017):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

What staff should do if a child requires mental health support:

The school has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

o) Special Educational Needs and/or Disabilities (SEND)

Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and DDSLs) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school needs to provide as much information as possible as part of the referral process to children's social care.

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

Contextual safeguarding issues the school is particularly alert to:

- Proximity to Kings Cross station and other routes out of London, making county lines more
 of a risk to pupils in our community. This is when vulnerable children are made to carry
 drugs along train lines out of the city.
- Girls are often supported by nannies rather than parents outside of school hours.
- Gang culture there are supposedly numerous gangs that operate in the area.
- Links to **senior school children**. It is worth remembering that our girls do have links to numerous senior school children in the local area who will have their own range of, often more complex, issues e.g. self-harm, social networking etc. Girls may be exposed to matters which they may struggle with socially and emotionally.
- Homelessness in the local area can expose pupils to social issues.
- There are some local hospitals meaning girls may come into contact with vulnerable patients. This can have an emotional impact on our pupils.
- There are **some busy roads and train tracks** in the local area, and there has been a recent child fatality on a main road.
- **Domestic abuse, drug/alcohol issues and mental health issues** are reported as very high among households with children in the Camden area.

SPECIFIC SAFEGUARDING ISSUES

Behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

CONCERNS ABOUT A CHILD

The school has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.

Parents are encouraged to raise any concerns directly with the school, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the Independent Schools Inspectorate (ISI) directly if they wish.

The school has arrangements for listening to children and providing early help. Details of these arrangements are in the school's wellbeing policy.

PROCEDURE FOR DEALING WITH CONCERNS ABOUT A CHILD: LOGS OF CONCERN & MASH

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

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the DSL.

What staff should do if they have concerns about a child:

During a conversation when a child makes a disclosure, all staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing (a log of concern): preferably on CPOMS or on a paper/electronic log of concern sheet which will be uploaded to CPOMS by the DSL or DDSL. The record should include:

- the date, time and place of the conversation/observation
- detail of what was said/seen and done by whom and in whose presence.

- the full name of the member of staff and their position, the full names of any pupils or other adults included in the concern (if known).
- When the incident took place and where
- Whether the child wishes their parents (or legal guardians) to be informed
- The child's views on speaking to anyone else associated with the incident e.g. peers
- Details may also include any concerns about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of school.
- A body map may be attached to provide additional detail of any physical mark(s).
- Details of the action taken by the member of staff. The member of staff should ask open questions and not leading questions; listen carefully and keep an open mind; not take a decision as to whether or not the alleged abuse or neglect has taken place. Any other evidence, such as written notes, items of clothing or mobile phone messages should be given to the DSL.
- The record should be uploaded on CPOMS or given to the DSL in person within 24 hours (or urgently if there is an immediate risk or signs of actual harm). In an emergency, the DSL or a DDSL must always be alerted immediately (see procedure below).
- Where at all possible, a signature or electronic signature should be given. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or the DDSLs.

Where there is a safeguarding concern, the school will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School operates its processes with the best interests of the pupil at their heart.

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Contact details for a non-immediate referral:

These are made by the DSL way of an e-CAF referral to the Family Support Social Worker (FSSW) MASH team (using the link: https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw).

What staff should do if a child is in danger or at risk of harm:

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care (MASH) and/or the police. This can be done with the support of the DSL team, or in their absence, by any member of staff. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a

decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should take immediate action and not stop to write a referral if it in any way hinders support for the child, making a written referral as soon as possible afterwards.

Contact details for an immediate referral:

Multi Agency Safeguarding Hub (MASH): 020 7974 3317 9am-5pm

LBCMASHadmin@camden.gov.uk / LBCMASHadmin@camden.gov.uk.cjsm.net_(secure email)

LADO Name: Sophie Kershaw Deputy LADO: John Lawrence-Jones Contact details: 020 7974 4556

Emergency Duty Team (Out of hours):

Tel: 020 7974 4444

The Police 999

Following a phone referral, the DSL will complete an e-CAF referral to the FSSW MASH team (using the link: https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw).

PROCEDURE FOR DEALING WITH CONCERNS ABOUT A CHILD: EARLY HELP

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

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

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is experiencing, or is at risk of experiencing family ostracism
- is a privately fostered child.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the school's DSL. The DSL will consider the appropriate action to take in accordance with the procedure below. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

The DSL will refer to Camden's thresholds and eligibility criteria (<u>Safeguarding children - Camden Council</u>) to help make decisions on the child's level of need and the appropriate service to refer on for services. (This is in accordance with agreed inter-agency procedures set out in Pan-London policies).

Referral for early help services procedure:

These are made by way of an e-CAF referral to Camden's Early Help/CAF team for children with low-level needs who may need extra services which cannot be provided by the school to help them achieve good outcomes: https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw

PROCEDURE FOR DEALING WITH CONCERNS ABOUT A CHILD: CHILD REQUIRING A SOCIAL WORKER (CHILDREN IN NEED AND CHILD PROTECTIONS PLANS)

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

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

Referral for a social work service:

These will be made by way of an e-CAF referral (https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw) to the FSSW MASH team for children with medium level needs who are likely to be assessed as being a child in need under section 17 of the Children Act 1989 (services to Children in Need as defined by the Children Act 1989).

CONCERNS ABOUT A MEMBER OF STAFF/VOLUNTEER (INCLUDING SUPPLY STAFF, VOLUNTEERS, THE HEAD AND GOVERNORS)

In any allegation against a member of staff the welfare of the child is paramount; staff are responsible for their own actions and behaviour and should avoid any contact that would lead any reasonable person to question their motivation and intentions. If an allegation is made against a teacher or other member of staff/volunteer, a quick resolution of that allegation must be a clear priority to the benefit of all concerned.

Teachers are vulnerable to accusations of abuse as they come into contact with children in a variety of situations including the wider caring role. The staff code of conduct is important in helping staff to understand risks and not to place themselves in vulnerable situations. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

The School's procedures for managing allegations against staff (including supply staff, volunteers, the Head and governors) are explained in full in the school's whistleblowing policy, and elaborated upon below.

PROCEDURE FOR DEALING WITH CONCERNS ABOUT A MEMBER OF STAFF OR VOLUNTEER (INCLUDING SUPPLY STAFF, VOLUNTEERS, THE HEAD AND GOVERNORS)

If staff have safeguarding concerns about another staff member (or adult listed above) then this should be referred immediately to the Head without delay. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, the matter should be directly handed to the designated officer(s) at the London Borough of Camden (LADO).

If a child makes an allegation of abuse staff must also make a detailed, dated record of the conversation including:

- the date, time and place of the conversation/observation
- detail of what was said/seen and done by whom and in whose presence.
- the full name of the member of staff and their position, the full names of any pupils or other adults included in the concern (if known).
- When the incident took place and where
- Whether the child wishes their parents (or legal guardians) to be informed
- The child's views on speaking to anyone else associated with the incident e.g. peers
- Details may also include any concerns about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of school.
- A body map may be attached to provide additional detail of any physical mark(s).
- Details of the action taken by the member of staff at the point of disclosure. The member of staff should ask open questions and not leading questions; listen carefully and keep an open mind; not take a decision as to whether or not the alleged abuse or neglect has taken place. Any other evidence, such as written notes, items of clothing or mobile phone messages should be given to the Head/Chair of governors.
- The record should be given to the Head/Chair of governors in person immediately.
- Where at all possible, a signature or electronic signature should be given.
- Staff should not promise confidentiality.

Contact details for an immediate referral:

Chair of Governors Nick Green (nick.green@stchristophers.london)	
Head	Sandrine Paillasse (Ext. 215/
	sandrine.paillasse@stchristophers.london)

L	ADO, Multi Agency Safeguarding Hub (MASH): 020 7974 3317 9am-5pm
L	.BCMASHadmin@camden.gov.uk / LBCMASHadmin@camden.gov.uk.cjsm.net (secure email)

In the event of an allegation being made against a member of staff, the Head will immediately contact the Local Authority Designated Officer (LADO) for advice. If an allegation is made against anyone working with children in the school, the school should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the 'designated officer' on a no-names basis.

Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. If an allegation is reported to the DSL, the DSL will inform the Head without delay. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and designated officer.

The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the police immediately). All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the police and/or children's social care.

The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer, WT and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police.

The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The school has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the

alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future.

The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA)). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

All allegations, including those appearing not to be serious will be followed up, taken seriously and examined objectively; parents of the child or children involved will be told about the allegation as soon as possible and kept informed of developments and outcomes including the outcome of any disciplinary hearing.

In accordance with KCSIE, if the allegation is about the safeguarding of a child, the Head will also act as the DSL and take any appropriate action.

The accused member of staff will be informed as soon as possible after the LADO has been consulted and then be kept informed of the progress of the case. If the person is suspended he or she will be kept informed of developments at school; If there is an internal school investigation and the allegation does not involve a possible criminal offence, the investigation should be completed within 10 working days and a decision made whether or not to take disciplinary action should be made within a further 2 working days.

From 1 October 2012, there have been restrictions on the reporting or publishing of allegations against teachers. Every effort must be made to maintain confidentiality and to guard against unwanted publicity. The school is under a duty to consider making a referral to the Teaching Regulation Agency [formerly the National College for Teaching and Leadership (NCTL)] where a teacher has been dismissed for "unacceptable professional conduct", as a prohibition order may be appropriate. Further guidance is published on the GOV.UK website. If a referral has been made to the DBS, a second referral must be made to the TRA.

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

All staff should:

- work, and be seen to work, in an open way.
- discuss and/or take advice promptly from their line managers or another senior member of staff over any incident that may give rise to concern.
- keep records of any such incident and of decisions made or further actions agreed, in accordance with school policy for keeping and maintaining records.
- Adhere to the Staff Code of Conduct.
- apply the same professional standards regardless of personal characteristics, including for example gender or sexuality.
- be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- read and understand the Whistleblowing Policy and feel able to raise concerns internally. If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line given in the contacts' section of this policy.
- Understand that effective safeguarding is 'everyone's responsibility'.
- Avoid physical contact with children as far as is reasonably possible.
- If you have to have physical contact with a child make sure that doors are open and others are about.
- Distance yourself kindly if children stroke, hug or touch you, and help them to learn what is and is not appropriate towards adults outside the family.
- Never administer corporal punishment.
- Young children may need reassurance or comfort. Give this if appropriate but be aware of the guidelines above and below.
- Report any issues or concerns to your supervisor about any situation where you feel any of the above points have been compromised or you feel vulnerable to accusations.

Additionally on residential field trips (see also Educational Visits Policy), staff should:

- Never take a child into your room.
- Wake up another adult at night if a child takes more than a few minutes to settle.
- Keep careful records of medical aid administered.
- Be careful when entering dormitories, shower rooms and bathrooms.
- Hair drying using an electric dryer should be done by an adult in a central public place with another adult present. Ask the child if you may wet/dry her hair, avoid touching her head.
- Sun cream should be applied by child.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO.

FURTHER ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS:

The school's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business

('the agency'). The school will usually take the lead but agencies should be fully involved and cooperate in any enquiries from the LADO, police and/or children's social services.

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

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

When using an agency, the school should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

SAFER RECRUITMENT

The school is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment.⁸⁸ Alternatively, if the applicant has subscribed to it and gives permission, the school may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, governors and volunteers to work with children and young people is set out in the school's safer recruitment policy.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the school's visiting speaker procedures.

The school will report to the Disclosure & Barring Service (DBS), within one month of leaving the school, any person (whether employed, contracted, a volunteer or a student), whose services are no longer used because he or she is considered unsuitable to work with children. The DBS referral address is: PO Box 181, Darlington DL1 9FA (tel. 0300 123 1111). It is an offence not to report such cases. See Safer Recruitment Policy for further information.

PROCEDURE FOR STAFF TO RAISE CONCERNS ABOUT SAFEGUARDING PRACTICES AT THE SCHOOL

The school aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding systems, these should be raised in accordance with the school's whistleblowing procedures which can be found in the whistleblowing policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

What staff should do it they have concerns about safeguarding practices in the school:

If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the key contacts page at the start of this policy.

MANAGEMENT OF SAFEGUARDING

The Safeguarding Team:

The school's DSL is **Rebecca Thomas** who is a member of the leadership team.

The DDSLs are: **Stephanie Martineau, Ella Schierenberg and Sandrine Paillasse**. They are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL's and DDSL's contact details can be found on the key contacts page at the start of this policy.

The Role of the DSL:

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school, holding ultimate responsibility for online safety, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL works with the governors to review and update the school's safeguarding policy. Where a pupil leaves the school, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or a DDSL will always be available to discuss safeguarding concerns. During term time, the DSL and DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements to contact the DSL by mobile phone/email (given on the key contacts page).

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

Full details of the DSL's role can be found at Annex B of KCSIE.

Whilst the governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training are in line with advice from the three safeguarding partners.

All Staff

All new staff will be provided with induction training that includes:

- the safeguarding and child protection policy;
- the role and identity of the DSL(s) and any DDSLs
- the behaviour policy
- the staff code of conduct
- the school's whistleblowing procedure
- the online safety policy
- the acceptable use policy
- a copy of part one of KCSIE
- school leaders and staff who work directly with children will also be required to read Annex A
 of KCSIE
- Teaching staff and teaching assistants will also be given the attendance policy and missing child procedure.

Copies of the above documents are provided to all staff during induction. All other key policies associated with safeguarding are shared via the staff handbook.

Temporary staff, visitors and volunteers are provided with:

- The behaviour policy (for visitors) visitors
- The safeguarding and child protection handout
- the role and identity of the DSL(s) and any DDSLs
- the acceptable use policy
- the attendance policy and missing child procedure (all those involved in registration and collection of pupils)

All staff are also required to:

- Read Part one of KCSIE and confirm that they have done so. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via training.
- Understand key information contained in Part one of KCSIE. The School will ensure staff
 understanding by assessment at the end of training, ongoing monitoring by the DSL and
 regular quizzes.
- Receive training in safeguarding and child protection regularly, in line with advice from the LSCP. Training will include online safety and harmful sexual behaviours (including peer-onpeer, sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via regular bulletins.

DSL and DDSLs

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LSCE's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

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

Governors

The named governor will determine appropriate training (in liaison with the DSL) for the governing body. The principle of regular updating will prevail and the DSL will copy the named governor into the regular bulletins.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Dr Sarah Kavanaugh is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. She is a member of the governing body.

The school considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is carried out by means of an audit and a report to the governing body. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

a) Personal Social Health Education (PSHE)

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

The school will aim to ensure that curriculum development meets the following objectives (these are often met through the PSHE curriculum):

- Developing pupils' self-esteem;
- Developing communication skills;
- Informing about all aspects of risk;
- Developing strategies for self-protection, including the safe use of the internet and electronic systems;
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and children/adolescents;
- Developing non-abusive behaviour between pupils;
- Actively promoting the rule of law, democracy and tolerance (Fundamental British values).

b) Online Safety

The responsibility across the school (including EYFS) for online safety is held by the online safety coordinator, who works in liaison with the DSL who holds the ultimate and overall responsibility for this area.

The school understands that the internet can make children vulnerable to abuse or give access to inappropriate material. The school provides instruction for parents and pupils on safer use of the internet. The school uses appropriate category filters (Sophos) to prevent children viewing unsuitable material alongside staff supervision but staff need to be vigilant when children are using devices that are not connected to the school's network, Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

Children, staff and parents must sign an Acceptable Use Policy about the use of devices and parents are encouraged to follow these same principles at home.

Online safety (including when children are online at home) is an integral part of the School's IT curriculum and messages around online safety are shared frequently to parents (see Online Safety Policy for more information).

The online safety policy provides additional detail on how the school safeguards children from harm online. It also details information around pupils accessing 3G, 4G and 5G technology on School premises.

All staff, including EYFS, must have their personal devices switched off or on silent when supervising children (including on school trips) and mobile phones should not be visible in the classroom (see Online Safety Policy and Staff code of conduct). Personal cameras must not be used at any time and the class cameras must only to be used for school purposes and photographs downloaded onto the school's SharePoint and then deleted as soon as is possible and always in accordance with GDPR regulations. Parents are not permitted to use their mobile phones or camera in or around the school without prior approval from the Head.

c) Relationships and Sex Education (RSE)

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

Supporting All Pupils

a) SEND Children

The DSL will work with the learning enrichment coordinator to identify pupils with particular communication needs and to ensure clear guidance is available for staff in relation to their responsibilities when working with children and teaching them how to stay safe.

SEND children may face additional risks, e.g. to peer-on-peer abuse, so care will be taken to ensure communication barriers and difficulties are overcome, changes in mood, behaviour or injury are investigated thoroughly and indications of bullying are taken seriously.

The DSL will work with the learning enrichment coordinator to ensure there is clear training and support for staff working with pupils with intimate care needs.

b) Looked After Children (LAC) and Post-LAC

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority, and who were previously LAC (Post-LAC), i.e. those who are now adopted or who have returned to live with their parents/carers.

The DSL is the designated member of staff who has responsibility for their welfare and progress. The school ensures that the designated member of staff receives appropriate training in order to carry out their role.

c) Privately Fostered Children

Privately fostered children are those aged up to 16 who are cared for by someone who is **not** a parent or close family member, and where the care arrangement will last more than 28 days. Private fostering is a private arrangement between parents and the carer and normally happens when parents are working away or a child is sent to live in the UK by relatives. All private fostering must be reported to Camden fostering team 020 7974 6783, who have a duty to visit the child to safeguard their welfare.

d) Young Carers

Young carers are children who frequently take on responsibility for looking after parents or younger siblings, carrying out household tasks beyond what would normally be expected for a child of their age. This may be due to disability or poor health. If schools have a concern about a pupil they believe to be a young carer, they can contact Family Action on 020 7272 6933 for advice, and they can refer the pupil on for services and support.

Arrangements for Visiting Speakers

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. This is covered in the visiting speakers procedure. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.¹³⁹

The School is required to undertake a risk assessment¹⁴⁰ before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements¹⁴¹ considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases,

the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided. 142

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

Arrangements for Children Educated Off-Site (Excluding trips)

On occasions, children may need to be educated off-site, for instance to attend drama exams, or offsite performances. When pupils are under the care/supervision of the school, the educational visits policy will be applied regardless of how many pupils are offsite in a particular instance.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the school's early years or provision of care of pupils under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the school's recruitment and selection policy.

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

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

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Rebecca Thomas.

Duty to notify Ofsted

The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

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

Child Protection and Safeguarding: COVID-19 Addendum



Approved by:	Sarah Kavanaugh	Date: September 2020
Last reviewed on:	September 2020	
Next review due by:	(Upon changes and recommendations)	

Important Additional Contacts

ROLE	NAME	CONTACT DETAILS
Designated member of senior leadership team if DSL (and deputy) can't be on site	Mairead Clarke Emma Ghosh	mairead.clarke@stchristophers.london, Ext: 207 bursar@stchristophers.london, Ext: 247

1. Scope and definitions

This addendum applies during the period of school closure due to COVID-19, and reflects updated advice from the DfE, Camden Safeguarding Partnership and local authority (LA) of the London Borough of Camden.

It sets out changes to the school's normal child protection policy in light of the Department for Education's guidance <u>Coronavirus</u>: <u>safeguarding in schools, colleges and other providers</u>, and should be read in conjunction with that policy.

Unless covered here, the school's normal child protection policy continues to apply.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

Have a social worker, including children:

- with a child protection plan
- assessed as being in need
- looked after by the local authority
- Who have an education, health and care (EHC) plan

2. Core safeguarding principles

The school will still have regard to the statutory safeguarding guidance (KCSIE).

Although the school is operating in a different way to normal, it is still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that unsuitable people don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online

3. Reporting concerns

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this.

- The DSL and deputy DSLs will be primarily accessible on-site. Their remote contact details
 (for when they cannot be onsite or when face-to-face contact is restricted due to social
 distancing) have been updated on safeguarding notices on-site and on the school's policy.
 There is an emergency contact number which is available during extended school hours and
 references to Camden's MASH for out-of-hours emergencies.
- Those completing logs of concern will be encouraged to do so electronically using the CPOMS system, or following the procedure outlined in the above policy. For those unable to upload to the CPOMS system and where working remotely, they should contact the DSL/a DDSL to obtain an electronic version of the form.

As a reminder, all staff will continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

There is a Department for Education coronavirus helpline available to help answer questions about COVID-19 relating to education and children's social care. Staff, parents and young people can contact this helpline as follows:

Phone: 0800 046 8687 Opening hours: 8am to 6pm – Monday to Friday 10am to 4pm – Saturday and Sunday

4. DSL (and deputy) arrangements

We aim to have a trained DSL or deputy DSL available on-site at all times to contact during school hours usually over the phone but this contact could be made in person. There may be, on occasion, DSLs working off-site who can be contacted remotely if necessary. Details of all important contacts are listed in the 'Important contacts' section at the start of this addendum. Urgent contact should ideally be made in person/over the phone and never by email.

We will ensure that DSLs (and DDSLs), wherever their location, know who the most vulnerable children in our school are.

When there is no DSL or DDSL on site, but there is a senior leader on site, they can be asked to take responsibility for co-ordinating safeguarding on site if required by the remote DSLs. This will be any of the senior members of staff on site. The senior leader will be responsible for liaising with the off-site DSL (or deputy) to make sure they (the senior leader) can:

- Identify the most vulnerable children in school
- Update and manage access to child protection files, where necessary
- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments

Where there is no senior leader, DSL or DDSL on site, the DSL or deputy will travel to site to deal with the matter if on-site support is required.

5. Working with other agencies

We will continue to work with other agencies as outlined in our main policy.

6. Monitoring attendance

For children remaining offsite, we will not be completing our usual attendance registers or following our usual procedures to follow up on non-attendance. However we ask staff to remain in close contact with pupils working offsite. Staff should seek to ensure girls are engaging with their remote learning and follow up on their absence with their parents or carers, by the office in the first instance who will escalate any concerns to the DSL. Children working offsite will only be authorised by the Head if a case for isolation is presented and approved.

For any pupils who have a social worker, the school will notify their social worker, where they have one

The school is using the Department for Education's daily online attendance form to keep an accurate record of who is attending school.

The school will make arrangements with parents and carers to make sure it has up-to-date emergency contact details, and additional contact details where possible.

7. Peer-on-peer abuse

The school will continue to follow the procedure in the main policy for dealing with concerns around pee-on-peer abuse.

It is acknowledged that remote learning may increase the likelihood of this abuse. Therefore staff are asked to remain vigilant to this in particular.

8. Concerns about a staff member, volunteer, governor or visitor

The school continues to follow the procedure in the main policy regarding this area.

9. Support for children who aren't 'vulnerable' but where we have concerns

The school has the option to offer places in school to children who do not meet the Department for Education's definition of 'vulnerable', but who we have safeguarding concerns about. We will work with parents/carers to do this. These children could be ones currently being supported through early help, child in need or child protection.

If these children will not be attending school, the school will put a contact plan in place, as explained in section 10.1 below.

10. Safeguarding for children not attending school

10.1 Contact plans

The school has contact plans for children with a social worker and children who it has safeguarding concerns about, for circumstances where:

- They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or
- They would usually attend but have to self-isolate

These plans set out:

- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact

The school has agreed these plans with children's social care where relevant, and will review them upon changes or recommendations.

If the school cannot make contact, social care will be contacted.

10.2 Safeguarding all children

Staff and volunteers are aware that this difficult time potentially puts all children at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on pupils' mental health that are also safeguarding concerns, and act on concerns immediately. In particular, children are likely to be spending more time online (see section 11 below).

11. Online safety

11.1 In school

The school will continue to have appropriate filtering and monitoring systems in place in school.

If IT staff are unavailable, our contingency plan is to seek support from the London Borough of Camden if we have any questions or concerns.

11.2 Outside school

Where staff and those working on behalf of the school are interacting with children online, they will continue to follow our existing staff code of conduct as well as IT acceptable use policy. Further details of the remote learning guidance is provided as an appendix to the staff code of conduct.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

The school will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

11.3 Working with parents and carers

The school will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online

The school will provide regular updates to parents about ways in which they can play a part in keeping their children safe at home.

11.4 Zoom

The school acknowledges the significant benefits that come through live sessions on platforms such as Zoom, and believe Zoom Education to support the school's needs most effectively. Given the

numerous safeguarding benefits to wellbeing and monitoring of attendance through Zoom, live sessions have been introduced as part of the remote learning package. The school however does acknowledge that there are numerous measures that must be in place to ensure the safety of pupils and have therefore taking the following steps, as advised by Zoom Education and the TES in its setup, staff training and through communication to all those who use it on behalf of the school:

- Passwords are compulsory at school account level.
- All girls entering into a chat must use the "waiting room" feature to let girls in. During sessions where more than one pupil is expected to be online at one time, staff will wait for two pupils to appear in the waiting room before allowing the girls to enter.
- Parents will be advised to support their daughters in changing the names of their device so wherever possible staff accepting girls into the waiting room will recognise the girls. If they do not recognise the email address/username, it will not be possible to admit them.
- This means that the teacher only allows specific people into the meeting.
- In addition teachers have also been trained how to stop a meeting immediately.
- The default setting is that only the teacher can share their screen.
- 1:1 pupil contact is possible on Zoom and the guidance for this is detailed in the staff code of conduct.
- Breakout rooms should only be used under supervision by a member of staff, or supporting adult, working under the guidance of the class teacher. For any breakout rooms resulting in 1:1 pupil contact, the staff code of conduct should be referred to. When an agreed adult is a participant in a breakout room supervising a group/individual, a clear agreement should be made between the host (organiser of the group) and the agreed adult to allow the breakout room to be terminated at any point by the adult participant.

12. Mental health

The school understands that the pandemic may bring additional concerns around mental health for our pupils and staff have been trained to provide early support to children.

Where possible, we will continue to offer our current support for pupil mental health for all pupils through 1:1 sessions with pupils and referrals to CAMHS or our school therapist.

The school will also signpost all pupils, parents and staff to other resources to support good mental health at this time.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

13. Staff recruitment, training and induction

13.1 Recruiting new staff and volunteers

The school continues to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children, and continues to follow the procedures outlined in the main policy.

In urgent cases, when validating proof of identity documents to apply for a DBS check, the school will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

13.2 Staff 'on loan' from other schools

The school will assess the risks of staff 'on loan' working in our school, and seek assurance from the 'loaning' school that staff have had the appropriate checks. Risk assessments will be carried out by the School.

The school will also use the DBS Update Service, where these staff have signed up to it, to check for any new information.

13.3 Safeguarding induction and training

The school will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

13.4 Keeping records of who's on site

The school will continue to keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them.

The school will continue to keep our single central record up to date.

14. Children attending other settings

Where children are temporarily required to attend another setting, we will make sure the receiving school is provided with any relevant welfare and child protection information.

Wherever possible, our DSL (or DDSL and/or learning enrichment coordinator will share, as applicable:

- The reason(s) why the child is considered vulnerable and any arrangements in place to support them
- The child's EHC plan, child in need plan, child protection plan or personal education plan
- Details of the child's social worker
- Details of the virtual school head

Where the DSL, DDSL or learning enrichment coordinator can't share this information, the senior leader(s) identified in section 4 will do this.

We will share this information before the child arrives as far as is possible, and otherwise as soon as possible afterwards.

15. Monitoring arrangements

This policy will be reviewed as guidance from the three local safeguarding partners, the LA or DfE is updated, and as a minimum every 3-4 weeks by Rebecca Thomas, DSL. At every review, it will be approved by the full governing board.