HURLINGHAM SCHOOL AND NURSERY

EST. 1947

Safeguarding and Child Protection Policy

This policy applies to all activities of Hurlingham School, including the Early Years Foundation Stage.

Date of Review: September 2026
Date of Next Review: June 2027 *(subject to the date of publication of KCSIE 2027)* **or sooner as required.**

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Key Personnel, Contact Details and Training

Role	Name	Contact Details	Training	Date
Designated Safeguarding Lead (DSL) for the Prep School	Amelia Shore	020 8874 7186 amelia.shore@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** Child Protection Refresher 2026 Domestic Abuse: Children and Young People 2024 Raising Awareness of Child on Child Abuse 2024 Online Safety 2024 Safer Recruitment 2024 The Prevent Duty 2024	September 2026 September 2026 August 2024 August 2024 August 2024 September 2024 August 2024
Designated Safeguarding Lead (DSL) for the Nursery	Richard McLelland	020 8874 7186 richard.mclelland@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** Child Protection Refresher 2026 Safer Recruitment	September 2026 September 2026 September 2024

Principal **Member of the Board of Directors with responsibility for Safeguarding** *and* **School Prevent Lead**	Fiona Goulden	020 8874 7186 fiona.goulden@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** **Advanced Cert in Online Safety for DSLs** Child Protection Refresher 2026 Safer Recruitment in Education The Prevent Duty Mental Health First Aid (2 day course) **National Online Safety for DSLs** Managing Allegations of Abuse against Staff Adverse Childhood Experiences (ACEs) Raising Awareness of Peer-on -Peer Abuse	September 2024 September 2021 September 2026 November 2023 September 2024 May 2019 September 2021 September 2023 August 2020 October 2021
Head (Deputy DSL) (fully DSL trained and will act in the absence of the DSL (or other designated members of staff) or in the event that an allegation is made against the DSL).	Simon Gould	020 8874 7186 simon.gould@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** Child Protection Refresher 2026 **Safer Recruitment**	September 2026 September 2026 September 2024
Head of Upper School (Deputy DSL) (fully DSL trained and will act in the absence of the DSL (or other designated members of staff) or in the event that an allegation is made against the DSL).	Jessica Sykes	0208 8747186 jessica.sykes@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** **Child Protection Refresher 2026**	September 2026

Head of Early Years Designated Member of Staff with status and authority for Child Protection working in the Early Years Foundation Stage and our EYFS setting at Hurlingham Prep	Vicky Beeson	020 8874 7186 vicky.beeson@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** Child Protection Refresher 2026 **Safer Recruitment**	September 2026 September 2026 September 2024
Deputy Head of Nursery Designated Member of Staff (DMS) with status and authority for Child Protection for the Hurlingham Nursery to act in the absence of the Head of Nursery.	Gemma Kirk (Deputy)	gemma.kirk@hurlinghamschool.co.uk	**Designated Safeguarding Lead (Level 3)** Child Protection Refresher 2026	March 2026 September 2026
Chairman of the Board of Directors	Fiona Goulden	020 8871 9992 fiona.goulden@hurlinghamschool.co.uk		
Member of Board of Advisors with Safeguarding and Child Protection Oversight	Susie West	Care of: office@hurlinghamschool.co.uk	Safeguarding in Education Refresher	November 2024

Wandsworth Local Authority

Wandsworth Initial Point of Contact (IPOC) – to be contacted straight away if a staff member has serious concerns about immediate risk to a child or that a child has suffered significant harm and continues to be at risk.

Referrals to IPOC can be made by: Telephone: 020 8871 6622 and/or e-mail: IPOC@wandsworth.gov.uk

The IPOC is in operation Monday – Friday 9.00am to 5.00pm. At other times please contact the Out of Hours Duty Service on 020 8871 6000.

Role	Name	Telephone	Email
Safeguarding in Education Lead	Sophie Allen	020 8871 7961 Mobile: -07866 956554	sophie.allen@richmondandwandsworth.gov.uk
Early Education Safeguarding Lead & Childcare Places Service Lead	Matt Hutt	0208 8718820	Matt.hutt@richmondandwandsworth.gov.uk
IPOC / MASH referral and assessment service 9am – 5pm		020 8871 6622	mash@wandsworth.gov.ukearlyhelpsystems@richmondandwandsworth.gov.uk
IPOC / MASH referral and assessment service Out of hours duty service		020 8871 6000	
Safeguarding Standards Service	Manager: Indeep Sethi		Lado@richmondandwandsworth.gov.uk

LADO Officer	Anita Gibbons	07974 586461 0208 8715188	Anita.Gibbons@richmondandwandsworth.gov.uk
Police Current Police Sergeant for Safer Schools Officers, Youth Engagement and Cadets	MIchael Lewis	07827 763149	Mike.lewis2@met.police.uk
Wandsworth safety net (for Independent Domestic Abuse advisors)		0207 801 1777	

Prevent / Counter extremism

Role	**Name**	**Telephone**	**Email**
PREVENT and Hate Crime Co-ordinator	Naheem Bashir		naheem.bashir@richmondandwandsworth.gov.uk prevent@richmondandwandsworth.gov.uk
Local police force	Wandsworth	Emergency 999Non-emergency 101	
Anti-terrorist hotline		0800 789321	https://www.gov.uk/report-terrorism
DfE dedicated telephone helpline and mailbox for non-emergency PREVENT advice for staff and governors		020 7340 7264	Counter.extremism@education.gov.uk

Other Local Authorities

Anyone concerned about a child can contact the Children's Social Care Services Department in the local authority where the child is resident. Authorities near to the School include:

Local Authority	Working Hours	Out of Hours
Hammersmith and Fulham	020 8753 6600	020 8748 8588
Kensington and Chelsea	020 7361 3013	020 7361 3013
Richmond	020 8891 7969	020 8770 5000
Kingston	020 8547 5008	020 8770 5000

Other numbers

The following telephone numbers may be useful for pupils and parents:

ChildLine	0800 1111
NSPCC	0800 028 0285

Child Exploitation Online Prevention (CEOP)	0870 000 3344
Ofsted's Whistleblower Hotline	0300 123 3155

Statement of intent

Hurlingham School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken, and expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

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

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

- Ensuring that members of the Board of Directors, the Board of Advisors the Head and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation. The school takes a zero tolerance approach to abuse, including child on child abuse,racism and 'derogatory behaviour or other forms of physical violence and conflict', alongside the existing sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Promoting an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities
- Ensuring that the Head and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL for the Prep-School is **Amelia Shore** and the DSL for the Nursery is **Richard McLelland**. In the absence of the DSL, child protection matters will be dealt with by the deputy DSL, **Simon Gould or any of the trained DMSs detailed above**.

Important Notice

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child

Staff members must raise any safeguarding concerns with the appropriate safeguarding lead without delay. Concerns must be logged.

If a staff member has serious concerns about immediate risk to a child or that a child has suffered significant harm and continues to be at risk, they should contact Wandsworth Initial Point of Contact (IPOC)

immediately - wherever possible with the support of the designated safeguarding lead or a deputy lead. If a child is in immediate danger the police should also be contacted.

We will use the NPCC When to call the Police - Guidance for Schools and colleges to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, dob, address and contact details for parents / carers.

A referral in urgent circumstances can be made to the Multi Agency Safeguarding Hub (MASH) on the telephone but a completed Multi-Agency Referral Form (MARF) is required as soon as possible with key details included (even if additional background information is completed later) as s47 enquiries cannot be progressed with the Police unless a referral has been received. The MARF can be accessed online at https://www.wandsworth.gov.uk/health-and-social-care/children-and-families/make_a_referral_to_the_multi_agency_safeguarding_hub/

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial Intelligence	Artificial Intelligence (AI) is the capability of machines to perform tasks that typically require human intelligence, such as visual perception, speech recognition, decision-making, and learning from data to generate predictions or content> This includes Generative AI.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.

DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK's data protection laws
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	'Honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
HOTH	Harm from Outside the Home	Wider environmental factors in a pupil's life that may be a threat to their safety and/pr welfare, also known as 'Contextual Safeguarding'
HSB	Harmful Sexual Behaviour	Harmful sexual behaviour (HSB) is a term used to describe developmentally inappropriate sexual behaviour by children and young people which is harmful or abusive.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.

LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHEE	Personal, social, health,economic education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	Head of Learning Support and Neurodiversity. A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.
Nudes/Semi-Nudes (now known as Nudes/Semi-Nudes)	Youth Produced Sexual Imagery	Images or videos generated by children under the age of 18 that are of a sexual nature. These images may be shared between children and young people and/or adults via a number of devices such as phones, tablets, webcams or published to social media websites. This definition also covers **AI-generated, digitally altered, and deepfake nude/semi-nude imagery**. This term is now known as Nudes/Semi-Nudes.

Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

Safeguarding and **promoting the welfare of children** is defined for the purposes of this guidance as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

- Sexual "jokes" and taunting.

- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.

- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

    - The consensual and non-consensual sharing of nude and semi-nude images (Youth Produced Sexual Imagery (Nudes/Semi-Nudes) and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting"** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **"consensual and non-consensual sharing of nude and semi-nude images and/or videos"**, colloquially known as **"sexting"**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery (Nudes/Semi-Nudes). For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing

- A child touching themselves in a sexual way

- Any sexual activity involving a child

- Someone hurting a child sexually

- Sexual activity that involves animals

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- Data Protection Laws including UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and Data (Use and Access) Act 2025,
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Crime and Policing Act 2026
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- DfE (2023) 'The Prevent duty guidance'
- Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, Dec 2026
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education '
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- Supporting Pupils at School with Medical Conditions (Current Version: 2026)

Non-statutory guidance

- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'

- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (May 2024) 'Meeting Digital Technology in Schools and colleges'

This policy operates in conjunction with the following school policies:

- Children Missing from Education Policy (Appendix I)
- The Missing Children and Failure to Collect Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy (Appendix K)
- Child on child Abuse Policy (Appendix G)
- Anti-Bullying Policy
- Promoting Positive Relationships and Regulation
- Managing Behaviour
- E-safety Policy
- Staff Acceptable Use Policy and Agreement
- Data Protection Policy
- Taking, Storing and Using Images of Children Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy (Appendix J)
- Low-level Safeguarding Concerns Policy (Appendix Q)
- Safeguarding and Safer Recruitment Policy
- Code of Conduct (Staff)
- First Aid Policy
- Supporting Children with Medical Needs Policy
- Learning Difficulties, Disabilities and SEN Policy
- Intimate Care Policy
- Remote Learning Policy
- Social Media Policy
- Gender Questioning Children Policy

2. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from family help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction, including mandatory safeguarding induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local family help process and understand their role in it.

- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

Teachers, including the Head, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

The Board of Directors has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- **All staff** (teaching and non-teaching) are required to read **Part One in full**. The new *"Part One: Overview for All Staff"* document is a reference tool only and does not replace reading Part One in full.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead, the Principal, takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Ensure that all DSL and Deputy DSLs have the appropriate status, authority, skills and experience within the school.

- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the Board of Directors, the Principal, is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Head or another Director or Advisor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Board of Directors itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+, including those questioning their gender.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised anc checked (DBS and Barred List).
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all Directors or Members of the Board of Advisors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, trainee teachers, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to Child on child abuse.
- Ensure all staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents or reports of sexual violence and/or harassment.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an family help procedure and ensure all staff understand the procedure and their role in it.
- Acknowledge the importance of 'Harm from outside the home' (HOTH) or 'contextual safeguarding', which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.

- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the Board of Directors have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), data protection laws and the local multi-agency safeguarding arrangements.

The Head has a duty to:

- Ensure that the policies and procedures adopted by the Board of Directors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection (including online safety and have robust oversight of the filtering and monitoring systems and processes in place).
- Maintain the relevant skills and experience to perform the duties listed.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Head to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.

- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date on the School's CPOMS platform and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the Board of Directors to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations
- Keep detailed, accurate, secure written records of concerns and referrals on the school's CPOMS platform, and understand the purpose of this record-keeping.

The DSL has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances are in place via the provision of 3 deputy DSLs.. This is to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

3. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the family help process and by contributing to multi-agency plans to provide additional support.

Where a need for family help is identified, the school will allow access for CSCS from the relevant local authority (LA) for the child, and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

[Name your local safeguarding partnership here (the local authority area's arrangements) and confirm your policy reflects its published criteria for referral/early help thresholds — see also row 45 on referring concerns externally.]

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for family help.

Considering the above, staff will be aware that whilst the UK's data protection laws place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information sharing advice for safeguarding practitioners supports staff who need to make decisions about sharing information.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

4. Family help

In line with managing internally, the school or college may decide that certain children do not require referral to statutory services but may benefit from family help. Family help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse by providing support as soon as a problem emerges at any point in a child's life. Providing family help is more effective in promoting the welfare of children than reacting later. Family help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local family help process is and how and where to access support. More information on the family help process can be found in Working Together to Safeguard Children. For more information on Family Help click: https://s4s.wandsworth.gov.uk/Page/16976

Any pupil may benefit from family help, but in particular, staff will be alert to the potential need for family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have experienced multiple suspensions and are at risk of being permanently excluded.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.
- Are repeatedly removed from the classroom
- Are on part-time timetables

The DSL will take the lead where family help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local family help process will be followed as required.

Staff may be required to support other agencies and professionals in an family help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

5. Abuse and neglect

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or

community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling'. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing, causing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age. Children are more likely to know their abuser than not, and that under-13s can never legally consent to sexual activity

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Due to the nature of our setting, our staff are particularly alert to the possibility of affluent neglect amongst our pupils.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

'All staff, but especially the designated safeguarding lead (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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse — including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.'

We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. We also recognise children who witness domestic abuse are victims, that witnessing domestic abuse can have a lasting impact on children, and that children can be victims in their own relationships too, please refer to the Government guidance Domestic Abuse: how to get help. They may feel helpless, humiliated and in some situations blame themselves. Our school may be the only stable, secure, and predictable element in their lives. It is essential that indicators are identified and responded to well, all members of staff will be clear of the procedures to follow in reporting, recording, and referring any concerns.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

7. Child on child abuse (including harassment and violence)

For the purposes of this policy, 'child-on-child abuse' is defined as abuse between children. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring.

All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.

- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.
- discriminatory behaviour, including racism and faith-targeted abuse

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Child-on-child abuse is a safeguarding concern for **both the victim and the alleged perpetrator**, and explicitly includes misogyny, misandry, and sexual comments/jokes within its preventative scope.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

When managing allegations of Child on child abuse, staff will follow the appropriate safeguarding procedures, as well as those outlined in the school's Anti-bullying Policy and Behaviour, Rewards, Sanctions and Exclusion Policy as well as the Guidance for re children who abuse other children in Appendix H & Appendix F.

8. Monitoring Attendance

A child absent or missing from an education setting is a potential indicator of abuse or neglect, including exploitation. Local Authority guidance and procedures will be followed for dealing with a child who is absent or missing from education, or unexplainable and or/persistent absences, particularly on repeated occasions or if a child suddenly stops attending. The school will follow the school's Children Missing from Education Policy and procedures. For those children and families who have chronic poor attendance or persistent absenteeism, school will consider whether educational neglect is present and whether a referral to children's services is required, or whether the school should seek consent to begin an family help Assessment in order to coordinate a multi-agency plan of support for the child and family.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need at least two up-to-date

contact numbers for parents/carers. In line with the school's attendance policy, contact will be made for any unexplained absences on the first morning of any absence. Follow up calls will then be made throughout the period of absence. In addition, the attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or persistent absentees, or if a child suddenly stops attending. Schools should also scrutinise the attendance of off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or SEN will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns.

It is important that the school's attendance team, including the Local Attendance Officer are aware of any safeguarding concerns. It is critical that when a child is not attending school their welfare is confirmed and expected practice would be for an appropriate professional to visit the home and speak to the child alone, particularly if there are any safeguarding concerns. The timing for this home visit will be determined on a case-by-case basis. The school will seek to ensure it has at least two emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable and the child has not attended school. Where necessary, this may include reporting the child missing to the police. The school will ensure it is aware, in advance, of any difficulties in accessing the premises of a child's family home.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Children Missing Education (C.M.E.) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. All staff should be aware that children missing education, or those unexplainable and or/persistent absences, are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Children going missing, or unexplainable and or/persistent absences, can also be an indicator of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. When a child is deemed to be missing from education, or those unexplainable and or/persistent absences, school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, our school will follow the local protocol for Children Missing Education and make a C.M.E referral to the Local Authority Officer for C.M.E.

Some parents will decide to remove their child from the school role in order to educate them at home. For the majority of children, this choice will be with the child's best education at the heart of their decision and it will be a positive learning experience. However, this is not the case for all, and home education can mean that some children become less visible to services who are them to keep them safe and supported in line with their individual needs. Where a parent or carer has expressed their intention to remove their child from the school roll with a view to educating at home, the school will work together with other key professionals and will, where possible, attempt to facilitate a meeting with the family to ensure that all parties have considered what is in the best interests of the child. This is particularly important for those children who have SEND, are vulnerable, and/or who have a social worker. The school will also link with the named officer for Elective Home Education within the Local Authority. Staff are alert to the specific needs of

children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Alternative provision

Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil.

Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

9. Online safety and personal electronic devices

The school is a **mobile phone-free environment by default** in accordance with DfE statutory guidance, where departures are treated strictly as documented exceptions. The school will adhere to the E-Safety Policy at all times.

Online Safety

Children at Hurlingham School are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Through training, all staff members will be made aware of:

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

Filtering and Monitoring

The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school's E-Safety Policy and the guidance issued by the DfE in their filtering and monitoring standards (2023). The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online.

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns.

The school will ensure that a review of the effectiveness of filtering and monitoring is carried out at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Further information regarding the school's approach to online safety can be found in the E-Safety Policy.

Artificial Intelligence (AI) and Generative AI

The school's approach (for Staff and Children) to Artificial Intelligence, AI, (including Generative AI) can be found in the separate Artificial Intelligence Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety and its filtering and monitoring systems, in line with the guidance issued by the DfE in their filtering and monitoring standards, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff Acceptable Use Policy and Agreement.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and E-Safety Policy. The Data Protection Officer will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the Head will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

9. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. Staff will be aware that the sharing of intimate images without consent is an offence under the Online Safety Act 2023, and includes AI generated imagery or deepfakes.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

The School will refer to the Behaviour, Rewards, Sanctions and Exclusion Policy when responding to incidents of consensual and non-consensual sharing of indecent images and videos. It will also ensure this this behaviour is viewed as a Safeguarding concern for both the victim and perpetrator.

10. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

11. Pupils potentially at greater risk of harm

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

The School recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation

- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.
- Children who are lesbian, gay, bisexual, or gender-questioning.

Pupils who need social workers

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and mental health. We take these needs into account when making plans to support pupils who have a social worker. The school works with Virtual School Heads in the reporting of attendance for any child who has a social worker.

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision's pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC, and those in Kinship Care

We will ensure that we hold information in relation to a child's looked after legal status and any contact arrangements. The designated teacher for looked after children will hold details of the child's social worker and the name of the Virtual School Headteacher in the authority that looks after the child alongside contact information for any key services working with the child.

We will ensure that key staff are aware of the potential vulnerability of children looked after, previously looked after children and those in kinship care arrangement. We will ensure that all staff have the skills, knowledge and understanding to keep these children safe.

We recognise the importance of all agencies working together and taking prompt action when necessary to safeguard looked after children, previously looked after children and those in kinship care as these children are a particularly vulnerable group.

We will identify a designated teacher as required in law to work with local authorities to promote the educational achievement of looked after children and previously looked after. The Designated Teacher is required to undergo regular and appropriate training to carry out the role.

We will liaise with the Virtual School Headteacher and members of the Virtual School support team to ensure accelerated progress for Children looked after, previously looked after, kinship care and those children with a social worker.

The designated teacher will be an active advocate for Children looked after and previously looked after. They will work with the Virtual School to discuss how Pupil Premium Grant funding held by the respective Virtual School Head may be best used to support the progress of looked after children in the school and meet the needs identified in the child's termly Personal Education Plan. All looked after children will have a Personal Education Plan (PEP) as part of the care plan that the local authority looking after the child has in place, this should be reviewed termly.

The designated teacher will also work with the Virtual School to promote the educational achievement of previously looked after children. The Designated Teacher will liaise with the Virtual School to support children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales (Children and Social Work Act 2017). The school will manage Pupil premium plus for previously looked after children.

The school will be familiar with the Statutory guidance: Promoting the education of looked-after and previously looked-after children which contains further information on the roles and responsibilities of Virtual School Heads and the support of looked after and previously looked after children.

The school will liaise with the Virtual School in relation to their responsibilities in the oversight of the educational attendance, attainment, and progress of children with a social worker. This involves identifying and engaging with key professionals in order that our role in improving outcomes for children with a social worker is fully understood and actioned.

The school will be familiar with the Non-statutory guidance: Promoting the education of children with a social worker and children in kinship care arrangements (March 2024) which contains further information on the roles and responsibilities of Virtual School Heads and the support of children with a social worker or in a kinship care arrangement.

We will work alongside the Virtual School with the joint endeavour to improve the wellbeing and educational outcomes of this vulnerable group of children

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability

- Pupils with SEND can be disproportionally impacted by issues such as peer to peer group isolation or bullying, without outwardly showing any signs

- Communication barriers may exist, as well as difficulties in overcoming these barriers
- the potential for children with SEND or certain medical conditions being disproportionately
- risks that they do not understand that what is happening to them is abuse'
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care
- issues over cognitive understanding — being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school, or the consequences of doing so.

At Hurlingham School we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Gender Questioning Pupils

This policy should be read alongside the school's Gender-Questioning Children policy, which sets out our approach to supporting pupils who are exploring their gender identity.

Pupils requiring mental health support

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

12. Use of the school premises for non-school activities

Where the Board of Directors hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the Board of Directors provides the activities under the direct supervision or management of school staff, the school's child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Board of Directors will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including

inspecting these as needed. The Board of Directors will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Board of Directors will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement. All external providers will be expected to follow the safeguarding arrangements detailed in 'Keeping children safe in out-of-school settings' and any allegations against their staff will be managed by the school in the same way as for school staff.

The School will follow its own safeguarding and child protection procedures where they have concerns about the out-of-school provider. This may include contacting the local authority designated officer in the case of concerns about adults.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

13. Alternative provision

The school will remain responsible for a pupil's welfare and safeguarding during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

14. Work experience

Where the school has pupils conducting work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

15. Homestay exchange visits

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The school itself has a duty to inform the local authority of the arrangements. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

16. Children Raising Concerns

Systems are in place within school, and are well promoted, easily understood and easily accessible for children to confidently report any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. These systems include MyVoice Boxes, our 'Trusted-adult' activity within the PSHEE Curriculum, prominent posters around school indicating named contacts for who is available to talk. Reminders of these systems are shared regularly in form time, assembly time, committee meetings and house meetings.

17. Concerns about pupils

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in Communication and Confidentiality (Section 20 of this policy) and the *Safeguarding and Child Protection Protocol and Procedures including Guidance for Staff on Suspecting or Hearing a Complaint of Abuse in Appendix D*.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The school will refer to the The Wandsworth Levels of Need Framework when considering referrals. This focuses upon the needs of children and their. families; any risk of harm to them within their family, or within a wider environment or context. It is intended to support the partnership in discussion about the levels of need and the most appropriate and helpful response across services within the partnership.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If family help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on CPOMS

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

18. Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart (Appendix E) will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as family help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

19. Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures contained within the Staff Handbook will be followed. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

20. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and

understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the *Policy on Procedures When a Member of Staff, Volunteer, Trainee Teacher ,Contractor, DSL or Head Faces Allegations of Abuse (Appendix J).* Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-level concerns will be handled in line with the schools’ *Low-level Concerns and Self Referral Policy (Appendix Q)*.

20. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim’s wishes against their duty to protect the victim and others. Where a referral is made against the victim’s wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim’s parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator’s parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

21. Safer recruitment

The School's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The Head of HR will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all Directors, Advisors, volunteers, and contractors.

Volunteers working within EYFS must not be permitted to begin working within the settings covered by the EYFS framework until the school or maintained nursery school has received the volunteer's enhanced DBS certificate including barred list information

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity.'

Existing volunteers who newly fall into regulated activity from 1 September 2026 must be checked (enhanced DBS + barred list, or in defined circumstances a standalone barred-list check). The 3-day/30-day threshold counts cumulatively across settings — if a volunteer helps at more than one school or college, the schools should work together to decide who obtains the check.

Volunteers who are not in regulated activity should still have a written risk assessment on file, considering the nature of the role, what the school knows about the volunteer, and whether a lower level of check (an enhanced DBS without barred list, or a basic DBS) is appropriate.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

22. Single central record (SCR)

The School keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

23. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on an annual basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Safeguarding and Child Protection Policy.
- The Child on child Abuse procedures (Appendix H).
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE)
- The Managing Behaviour Policy
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment (Guidance found in Appendix I).
- Contextual safeguarding.
- How to keep LAC and PLAC safe – further explicit training will also be implemented for relevant staff as and when a LAC or PLAC is present in School.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

24. Monitoring and review

This policy is reviewed at least annually by the DSL, the Principal and the Head. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

Appendix A - Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent or missing from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence
17. Child on Child Abuse
18. Adult Involvement in Youth Produced Sexual Imagery
19. Misinformation, Disinformation and Conspiracy Theories
20. Child to Parent Abuse
21. Young Carers
22. Children with Medical Conditions
23. Racism, faith-based prejudice, and other discrimination

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.

- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse — they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

The National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day, on 0808 2000 247.

Operation Encompass

The school will continue to engage in Operation Encompass, the national police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse. Since November 2025, Operation Encompass has been a statutory duty on police forces in England and Wales, not a voluntary scheme. Where police have reasonable grounds to believe a child may be a victim of domestic abuse, they must notify that child's education setting (and, where relevant, the local authority). This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

The DSL is the school's 'Key Adult' for Operation Encompass notifications. Notifications must never include sexual-offence details (Sexual Offences (Amendment) Act 1992).

Operation Encompass also provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday, on 0204 513 9990 (charged at local rate).

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children Missing from education

A child being absent from school for prolonged periods and/or on repeat occasions is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that are absent from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy (Appendix I). The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.

- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants

- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. This may constitute modern slavery... a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE. It is not possible for a child to consent to be exploited, abused or trafficked

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County lines

For the purposes of this policy, **“county lines”** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of a "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 and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence towards victims (and their families) if they attempt to leave.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.

- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, **“child sexual exploitation”** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

Indicators of child sexual exploitation may include: acquisition of money, clothes, mobile phones etc. without plausible explanation; gang-association and/or isolation from peers/social networks; exclusion or unexplained absences from school; going missing or returning late; excessive receipt of texts/calls; returning home under the influence of drugs/alcohol; inappropriate sexualised behaviour for age; evidence or suspicion of physical or sexual assault; relationships with controlling or significantly older individuals; multiple unknown callers; frequenting areas known for sex work;

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Isolation from peers/social networks
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Excessive receipt of texts/calls
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.
- Evidence or suspicion of physical or sexual assault
- Relationships with controlling or significantly older individuals
- Multiple unknown callers
- Frequenting areas known for sex work;
- Concerning internet/social media use;

- iIncreasing secretiveness;
- Self-harm

All concerns related to CSE will be managed in line with the school's safeguarding Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.

- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community

coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Head and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or Head will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated as part of their annual safeguarding training about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act

appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. Specific concerns could include self-harm, signs of an eating disorder, suicidal ideation or suicide.

School staff are not expected or trained to diagnose mental health conditions, but may notice behaviours that are of concern. – the school will ensure this any diagnosis is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education. Staff have four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness;
- observing pupils and identifying early those who may be experiencing mental health problems or at risk of developing one;
- ensuring early targeted support is provided;

- liaison with/referral to specialist services where needed.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies. This may include working with Mental Health Support Teams (MHSTs) being rolled out to all schools and colleges, and to early support hubs and young futures hubs as additional local resources.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.'

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The DSL should then assess risk and, where relevant, put in place a 'safety and support plan'.

Staff will remain alert to 'children with disrupted education' (suspensions, exclusions, time in alternative provision) and to the fact children 'might be at highest risk of serious violence around the school day (for example immediately after school).

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.

- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The School will be aware that the Police, Crime, Sentencing and Courts Act introduced a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

Please refer to Youth Endowment Fund (YEF) for evidence-based early support.

New Pupil Admissions: Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on us as the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. In practice, a conversation would take place between the DSLs at the sending and receiving settings where there are issues or concerns.

Child on Child Abuse

Child on Child abuse is covered fully in this policy under Paragraph 8, Child on Child Abuse.

Adult Involvement in Nudes/Semi-Nudes (Youth Produced Sexual Imagery)

Sexually motivated incidents

The school will remain aware that not all instances of Nudes/Semi-Nudes will be between children and young

people, and in some cases may involve adults posing as a child for the purpose of obtaining nude

and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images.

These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.

- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents of Nudes/Semi-Nudes involving adults may also be called “sextortion”, where the

offender threatens to release nudes or semi-nudes of a child or young person unless they do

something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or *AI-generated images of the child or young person.

*(Computer systems and software that are able to perform tasks that ordinarily require human

intelligence, such as decision-making and the creation of images).

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody
- under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

Misinformation, Disinformation and Conspiracy Theories

Three online risks and harms were identified in KSCIE 2025. These are defined as

- **Misinformation** - This is false or misleading information that is shared by someone who believes it to be true. They are not trying to cause harm, but what they pass on is still wrong and can mislead others
- **Disinformation** - This is false information that is deliberately created and spread to cause harm, mislead, or manipulate people. It is intentional.
- **Conspiracy Theories** - These are stories or ideas that claim events are secretly being controlled by powerful groups, often without evidence. They can make children fearful, mistrustful of adults or authorities, and vulnerable to harmful influence.

Child to Parent Abuse

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.'

Young Carers

Staff should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Where appropriate, young carers are identified at the admissions point, and/or via pastoral systems, and are logged on CPOMS, noting attendance, a named point of contact, and/or a link with a local young carers' service.

Children with Medical Conditions

These notes refer solely to the safeguarding threshold for children with medical conditions. The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school... or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

For further details on the medical-incident process itself, see the Schools Supporting Pupils with Medical Conditions policy.

Racism, faith-based prejudice, and other discrimination

The school recognisies the duty for all staff to recognise racism, faith-based prejudice, and other discrimination as harm in its own right. Racism and faith-targeted abuse can significantly affect a child's welfare, wellbeing and sense of safety

Appendix B - Job Descriptions

The Designated Safeguarding (DSL) Lead

The DSL for the Prep School is Amelia Shore. The DSL for the Nursery is Richard McLelland.

Job Description 2026/27

Job Title: Designated Safeguarding Lead for Safeguarding & Child Protection (DSL)

Accountable to: The Boards of Advisors and Directors, and the Local Authorities

Role: The responsibilities and duties of the Designated Safeguarding Lead are as follows:

The broad areas of responsibility for the designated safeguarding lead are:

- to take lead responsibility for safeguarding and child protection (including online safety and have a robust oversight of the filtering and monitoring systems and processes in place).
- to be alert to and recognise safeguarding issues and to raise and share concerns when appropriate;
- to know when to make referrals to social care when appropriate and ensure staff know how to contact the DSL about doing so;
- to manage referrals
    - Refer cases of suspected abuse that do not involve a staff member (except the Head) to local authority children's social care
    - Refer cases of suspected abuse that concern a member of staff to the Head and ensure he refers such cases to the local authority
    - Report cases where any member of staff is dismissed or leaves school due to risk and/or harm to a child to the Disclosure and Barring Service and, when appropriate, to the National College for Teaching and Leadership
    - Refer cases where a crime may have been committed to the Police
    - Support staff who make referrals to local authority children's social care
    - Refer cases to the Channel programme where there is a radicalisation concern
    - Support staff who make referrals to the Channel programme;
- liaise with the Head (and where appropriate the Board of Directors) to inform him or them of issues, especially ongoing "significant harm" enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.;
- to co-ordinate the Child Protection procedures in the School and act as a source of support, advice and expertise to staff (especially pastoral support staff, the Head of Media and Computing Resources and SENCOs) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- as required to liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies (the three safeguarding partners) in all matters of child protection, including keeping children safe on-line;
- to speak to parents, carers or child about any concerns if required;
- to advise and act upon all concerns, belief and evidence of abuse reported to them;
- to share information with others where necessary and keep the Head informed of all actions or issues, especially ongoing enquiries by the LA, unless the Head is the subject of the complaint;
- to ensure that good records are maintained;
- to monitor records of pupils in the school who are subject to a child protection plan to ensure that it is maintained and updated as notification is received;
- to liaise with other professionals when appropriate in respect of children in need and contribute to the multi-agency working (Team Around the Child) and any plans, meetings and decisions about a child if necessary;
- to recognise the importance of safer recruitment and ensure the implementation of safer recruitment practices;
- to recognise the importance of staff conduct and challenge poor practice in the workplace;
- to ensure that the Single Central Register is complete and fully up-to-date
- to ensure that appropriate online safety precautions and education are being implemented.

Training

The Designated Safeguarding Lead (and any deputies) receives appropriate training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSL will undertake Prevent awareness training. Training provides DSLs and their deputies with a good understanding of their own role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing family help and intervention, for example through locally agreed common and shared assessment processes such as family help assessments and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of information sharing, both within School and with the three safeguarding partners, other agencies, organisations and practitioners;
- ensure each member of staff receives regular training with due regard to the recommendations detailed in the most recent publication of KCSIE;
- ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection laws
- monitor the keeping of detailed, accurate, secure written records of concerns and Referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them;
- ensure on-line safety training, both for self and others, is updated regularly and that all staff understand the unique risks associated with online safety and are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- arrange mental health awareness training, both for self and others, is updated regularly;
- understand how to identify children at risk of radicalisation and how to support them with regard to the requirements of the Prevent duty;

- ensure that any member whose role requires it is trained in safer recruitment.

Raising Awareness

The Designated Safeguarding Lead ensures the School's policies are known and used appropriately in the following way:

- working with the Head and the Board of Directors, ensure the School's Safeguarding and Child Protection policies are reviewed annually and the procedures are implemented, updated and reviewed regularly;
- ensuring that the School's child protection policies are known, understood and used appropriately;
- ensuring the Child Protection policies are available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- liaising with the local authority to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- ensuring Child Protection files of pupils who have left the School are transferred securely to the new School as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained;
- ensuring that, where appropriate, relevant safeguarding enquiries are made for pupils joining the School;
- encourage a culture of openness where concerns are openly discussed and consideration is constantly given to improving and developing safeguarding practice
- helping to promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing or have experienced with teachers and the SLT. This will assist in ensuring that staff know who the children are, they understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection file (held electronically on CPOMS)

Where children leave the School the DSL must ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the DSL (or a deputy) should always be available (during school hours) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

The Designated Safeguarding Lead (DSL) has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The Deputy Designated Safeguarding Leads (DDSLs)

Job Description 2026/27

Job Title: Deputy Designated Safeguarding Lead for Safeguarding & Child Protection (DDSL)

Accountable to: The Designated Safeguarding Lead, the Boards of Advisors and Directors, and the LAs

Role: The responsibilities and duties of the Deputy DSL are as follows:

Deputy Safeguarding Leads are trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, t**he ultimate lead responsibility for child protection remains with the DSL** and will not be delegated except in extreme circumstances where the DSL is unable to carry out their duties.

The broad areas of responsibility for the deputy designated safeguarding leads are:

- to be alert to and recognise safeguarding issues and to raise and share concerns when appropriate;
- to know when to make referrals to social care when appropriate and ensure staff know how to contact the DSL about doing so;
- to manage referrals in the absence of the DSL
    - Refer cases of suspected abuse that do not involve a staff member (except the Head) to local authority children's social care
    - Refer cases of suspected abuse that concern a member of staff to the Head and ensure he refers such cases to the local authority
    - Report cases where any member of staff is dismissed or leaves school due to risk and/or harm to a child to the Disclosure and Barring Service and, when appropriate, to the National College for Teaching and Leadership
    - Refer cases where a crime may have been committed to the Police
    - Support staff who make referrals to local authority children's social care
    - Refer cases to the Channel programme where there is a radicalisation concern
    - Support staff who make referrals to the Channel programme;
- liaise with the DSL and Head (and where appropriate the principal on behalf of the Board of Directors) to inform him or them of issues, especially ongoing "significant harm" enquiries under section 47 of the Children Act 1989 and police investigations;
- to assist the DSL in co-ordinating the Child Protection procedures in the School and act as a source of support, advice and expertise to staff (especially pastoral support staff, the Head of Media and Computing Resources and SENCOs) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- as required, in the absence of the DSL, to liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- in the absence of the DSL, to be the point of contact for parents, pupils, teaching and non-teaching staff and external agencies (the three safeguarding partners) in all matters of child protection, including keeping children safe on-line;
- in the absence of the DSL to speak to parents, carers or child about any concerns if required;
- in the absence of the DSL to advise and act upon all concerns, belief and evidence of abuse reported to them;
- in the absence of the DSL to share information with others where necessary and keep the Head informed of all actions or issues, especially ongoing enquiries by the LA, unless the Head is the subject of the complaint;
- to ensure that good records are maintained;
- to monitor records of pupils in the school who are subject to a child protection plan to ensure that it is maintained and updated as notification is received;

- in the absence of the DSL or where otherwise appropriate to liaise with other professionals in respect of children in need and contribute to the multi-agency working (Team Around the Child) and any plans, meetings and decisions about a child if necessary;
- to recognise the importance of safer recruitment and ensure the implementation of safer recruitment practices;
- to recognise the importance of staff conduct and challenge poor practice in the workplace;
- in the event of an extended absence of the DSL to ensure that the Single Central Register is complete and fully up-to-date
- to ensure that appropriate online safety precautions and education are being implemented and they have an understanding of the filtering and monitoring systems, ensuring appropriate processes are in place.

Training

The Deputy Designated Safeguarding Leads receive appropriate training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DDSLs will undertake Prevent awareness training. Training provides DDSLs and their deputies with a good understanding of their own role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing family help and intervention, for example through locally agreed common and shared assessment processes such as family help assessments and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of information sharing, both within School and with the three safeguarding partners, other agencies, organisations and practitioners;
- assist in ensuring each member of staff receives regular training with due regard to the recommendations detailed in the most recent publication of KCSIE;
- assist in ensuring each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection laws
- assist in monitoring the keeping of detailed, accurate, secure written records of concerns and Referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them;
- assist in ensuring on-line safety training, both for self and others, is updated regularly and that all staff understand the unique risks associated with online safety and are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- assist in arranging mental health awareness training, both for self and others, is updated regularly;
- understand how to identify children at risk of radicalisation and how to support them with regard to the requirements of the Prevent duty.

Raising Awareness

The Deputy Designated Safeguarding Leads ensure the School's policies are known and used appropriately in the following way:

- working with the DSL and Head to review the School's Safeguarding and Child Protection policies and ensure that the procedures are implemented, updated and reviewed regularly;
- assist the DSL in ensuring that the School's child protection policies are known, understood and used appropriately;
- in the absence of the DSL, ensuring Child Protection files of pupils who have left the School are transferred securely to the new School as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained;
- in the absence of the DSL, ensuring that, where appropriate, relevant safeguarding enquiries are made for pupils joining the School;
- encourage a culture of openness where concerns are openly discussed and consideration is constantly given to improving and developing safeguarding practice
- assist the DSL in helping to promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing or have experienced with teachers and the SLT. This will assist in ensuring that staff know who the children are, they understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Availability

During term time the DDSLs, in the absence of the DSL, should always be available (during school hours) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DDSL would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

The DDSLs have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff in collaboration with the DSL.

Appendix C - Signs of Abuse

Guidance regarding potential signs of abuse from London Safeguarding Board procedures.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury.
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures
Fractures may cause pain, swelling and discoloration over a bone or a joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars
A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

Behavioural Indications
Some children may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a ‘loner’ – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.
Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

Appendix D - Safeguarding and Child Protection Protocol and Procedures

(including Guidance for staff on suspecting or hearing a complaint of abuse)

If you have a concern about a pupil or you receive information that leads you to be concerned that a pupil has been harmed or is at risk of harm or their welfare is being compromised you are required to act appropriately to ensure action can be taken to protect the pupil concerned.

The concern may be as a result of a disclosure from a pupil, a parent or a third party or may arise due to behaviour that has caused you to become concerned.

If a pupil discloses abuse please note the following key points:

- **Listen carefully to what the pupil is telling you without interrupting**
  Stay calm and sympathetic. Listen to what you are told without displaying shock or disbelief. Be observant and attentive without being judgmental. Do not probe or put words into the child's mouth – accept what is said. Reassure the child that it was right to tell, that you are sympathetic, that they are not alone, that you are glad they spoke up.

- **Do not promise confidentiality**
  Do not make promises that you may not be able to keep such as "everything will be alright" or "I won't tell anyone". Do not promise confidentiality to adults or children. (You have a duty to refer).

- **Remain non-judgemental and keep an open mind**

- **Do not ask leading questions, or more questions than you have to – just establish what the pupil is telling you**
  Respond calmly and openly. Do not ask leading questions (such as "What did he do then?") or interrogate. Ask open questions that will encourage a secure and sympathetic environment for the child, such as "Anything else to tell me?" "Yes?" "And?"

  Do not criticise the perpetrator or be judgmental.

  Do not ask the child to repeat it all for another member of staff.

- **Be honest with the pupil and explain what will happen next**
  Explain what you have to do next and who you have to talk to (the DSL or Head). Keep in contact with the pupil and, if a Children's Specialist Services interview is to follow, see that the child has a "support person" present if they wish (This may be you).

- **Keep a sufficient written record of the conversation. (See Appendix F)**
  Make detailed notes, preferably after the disclosure, and whenever appropriate check them with the child. Use the child's own words, not your interpretation. It is recommended that you don't take notes during the disclosure as this may inhibit the child – it is better if possible to write notes as soon as practical after the meeting. Notes written up to one hour after the disclosure may be treated as contemporaneous and used in court. <u>All notes must be uploaded onto the School's CPOMS platform as soon as possible and marked as confidential.</u>

  Notes must be shared with the DSL group on the CPOMS platform. It may also be appropriate to detail any signs of injury on a body map which is available on CPOMS.

  The record should include:
  (a) the date and time;
  (b) the place of the conversation; and

(c) the essence of what was said and done by whom and in whose presence.

The record written up on CPOMS by the person making it and should. The record must be kept securely on the CPOMS platform. The record of what was said by the child should as far as possible be in their own words and not in the adult's reinterpretation of those words.

In the case of concerns always record the information clearly and be clear how the concern has arisen. All evidence, for example, scribbled notes, mobile phones containing text messages, clothing and computers, must be safeguarded and preserved and passed to the Designated Person. Computers or other devices that might contain relevant evidence should not be searched or accessed by the member of staff hearing the complaint.

- **Pass on to the Designated Safeguarding Lead (DSL)**
  Inform the Designated Safeguarding Lead for Safeguarding (DSL) immediately if the information you have indicates that the pupil has suffered harm or there is a high level of risk.

  In all other instances concerns should be passed on to the DSL at the as soon as possible – do not delay.

  Any situations where a crime has been committed must be reported to children's social care or the police immediately but at most within 24 hours.

Please remember the DSL is available to offer help, advice and guidance to staff and pupils where necessary. If you have a concern or problem and are unclear how to proceed, ask for advice.

In all cases ensure ongoing support is offered to the pupil as appropriate.

Achieving the best evidence:

- Walk and talk, literally or metaphorically
- Get alongside the child – literally
- Do it immediately
- Listen very carefully
- Allow them to speak freely
- Do not ask leading questions
- Do not make assumptions
- **Focus on establishing: WHAT, WHEN, WHERE, WHO?**

DO:

- Try to be available to be spoken to. The child may not be ready when you are.
- Listen carefully to what the child says without interpreting.
- Keep an open mind about what you are told.
- Believe the child, even if you cannot see any injury which would support the story.
- Refer on ASAP, via DSL.
- Be prepared to speak to the Police or Children's Specialist Services

DON'T:

- Promise confidentiality.
- Pre-judge or make assumptions.
- Ask leading questions, or ask any more questions than you have to – just establish what the child is telling you, then stop.
- Record the conversation.
- Delay referral.
- Be afraid of being wrong.

All staff are reminded that:

Schools are not an investigative agency. That is the job of the Police and Children's Specialist Services.

Appendix E - Reporting Concerns about pupils & Referral Flowchart

If a member of staff has any concern about a pupil's welfare, they will act on them immediately by speaking to the DSL or deputy DSL(s). All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL(s) with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If family help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Managing referrals

The reporting and referral process outlined in flow chart below in this Appendix will be followed accordingly.

All staff members, in particular the DSLs, will be aware of the LA's arrangements in place for managing referrals. The DSLs will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as family help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

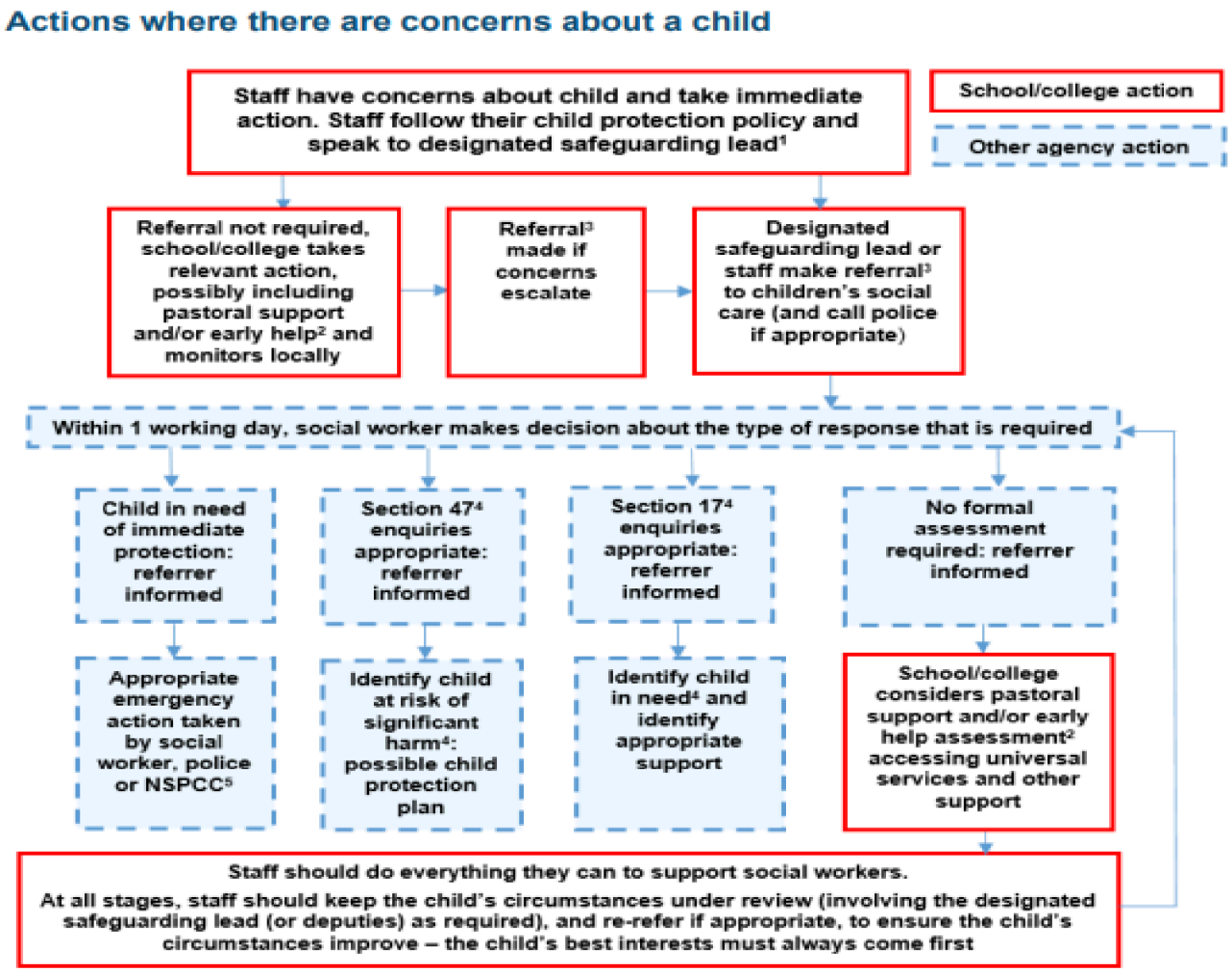
Children in Need

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

Children Suffering or Likely to Suffer Significant Harm – Child at Risk

LAs, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, FMG, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

Referral Flow chart



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

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

[5] This could include applying for an Emergency Protection Order (EPO).

Appendix F - Safeguarding recording and record keeping guidance for schools & forms

This guidance is intended to support effective recording of key (significant) events for pupils, safeguarding concerns and Child Protection issues.

The importance of accurate recording is generally well understood by staff members but advice is frequently requested in respect of this issue.

Note for DSLs - All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

• a clear and comprehensive summary of the concern

• details of how the concern was followed up and resolved, and

• a note of any action taken, decisions reached and the outcome.

It is important that records capture the child's voice and their daily lived experience.

Significant life events

Some key events in a child or family can have a significant impact and it is essential that these are clearly recorded on the child's file. An example of a significant event would be the death of parent, sibling or other close family member. Unnecessary distress can be caused to a child or parent if such significant information is overlooked or not known, so it is important that it is recorded in such a way as to be accessible to other members of staff who may be working with the child or in a position where they may be required to contact the family.

Capturing the Lived Experience

It is important to record and consider the child's wishes and feelings, as part of planning what action to take in relation to concerns about their welfare. Capturing the lived experience of the child is paramount to ensure that actions remain child centred. Systemic Practice is a way of working in partnership with children and young people and families to help them improve outcomes and address issues which prevent them from thriving. Systemic Practice does this by seeking to understand the relationships between family members, and between the family and their wider networks to help professionals understand why the family works the way it does. It is important to capture the child's lived experience and their own words when possible.

Key information

Schools need to have key information about pupils recorded and regularly updated. This information should include basic details such as

- which adults have Parental Responsibility for a child
- contact details for parents and any other nominated adults who can be contacted in case of emergency – it is advised that schools ask for **three contact numbers** for each child – one of which should be a trusted adult who the parent agrees can be contacted in an emergency but who does not live at the home address
- which adults the child lives with (especially in situations where parents do not live together) and contact arrangements if relevant
- any legal orders in place, particularly any which affect the care of the child

- any information which may impact on the safety of the child – eg adults who pose a risk to a child or are not permitted contact; Domestic Abuse issues etc
- details of any key professionals working with the child

Child Protection / safeguarding concerns

If the concern is as a result of third party information received this must be made explicit.

Designated Safeguarding Leads should record when the information was received and any discussion had with parents, other staff members or professionals from other agencies, the identity of the other professional (eg name of duty social worker) and clearly note any decisions or actions agreed. This includes recording the reasons for a decision not to make an external referral if this is relevant.

Copies of referrals made to external agencies should be kept in the child's individual confidential CPOMS record, alongside minutes of any meetings held, letters, e-mails etc.

Please remember when referrals are made it is important to include

- basic family details with contact details for the parents
- whether parents have been informed / consent to the referral
- if the concerns have not been discussed with the family why this is - usually only in cases where to do so may place the child at further immediate risk; where the parent is believed to have been responsible for / colluded in the child being sexually abused; or if all attempts to contact the parent have failed
- a clear explanation of your concerns and what actions you have already taken (if applicable)

Many safeguarding and / or CP concerns will not rely on a single incident or injury and will arise as a result of a series of smaller incidents, concerns and issues which build a picture that becomes more concerning over a period of time. It is therefore really important to ensure that a log of concerns is kept on CPOMS which will support effective decision making and (when necessary) referrals which provide clarity and evidence - based concerns.

In some circumstances the DSL may conduct a brief risk assessment for a pupil for whom school has CP concerns as this informs the level of risk / concern and what actions may need to be taken. For some pupils where there are complex concerns / high levels of concern related to risk, a more detailed risk assessment may be required.

Confidentiality

All records are held securely on the School's CPOMS platform, with access to particularly sensitive information restricted where necessary.

Members of staff with pupils at the School are restricted from viewing their own child's safeguarding record.

When passing on sensitive or confidential information to other agencies please ensure this is done in a secure manner.

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

When deciding what information to share, the school will consider: the relevancy of the information, including to the current safeguarding risk; what is necessary for the receiving setting to know; and whether it is clearly preented and appropriately contextualised.

The UK data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'

Transfer and retention of records

When pupils leave your school any CP / safeguarding information / records must be passed on to the receiving school (once confirmed) in a secure way and confirmation of receipt should be obtained.

Safeguarding and CP information is regarded as personal information and you do not necessarily need consent to share this. Generally, families should be made aware that information will be shared with a new school, what will be shared, with whom and why. If it is not reasonable to do this, or by doing so a child or young person's safety could be put at risk information can still be shared.

Guidance as to whether copies of CP / safeguarding files should be retained in the originating school is not absolute, but local practice has been developed and it is recommended that schools seek advice from the Local Authority (or their legal provider if relevant).

In Wandsworth, therefore, we recommend that key CP / safeguarding records are copied and one copy is retained in the originating school. It is immaterial whether original is retained and copy sent or vice versa

It is fine to retain either paper or electronic records so if there is shortage of filing space records can be scanned and retained electronically – some schools have chosen to do this – however if there are **original signed notes relating to a serious disclosure** it is advisable to retain the paper copy as these could be required

The computer systems that are on the market have facilities to transfer the data to other schools. At the time of writing, this does not mean that the data is transferred, it simply means that the previous school relinquish access, and access rights are transferred to the new school; the data is kept intact. If unsure please check with your provider.

Records should be retained 'long term', until the child is 25 years of age or older, then reviewed. IRMS guidance states that records should be retained for a longer period in 'instances where detailed information about activities in school may form an important part of safeguarding for that individual'.

This guidance is included in Government guidance: Data protection: toolkit for schools and the annual review checklist.

In addition, since the Independent Inquiry into Child Sexual Abuse (IICSA) was established, organisations should not destroy any records that might be relevant. Since we may not know at the time which records may be relevant, this provides justification for retention. Judicial review also supports this stance.

Schools should update their data audit log to reflect their retention period for these records

Allegations against staff and volunteers

Please note that any concerns of a safeguarding nature / allegations against staff and volunteers must be **recorded and retained**. These matters need to be treated as confidentially as possible and the records kept securely.

The records should include

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of child(ren) concerned
- how the matter was investigated
- action taken
- consultation with LADO / advice given
- outcome of above
- risk assessment
- safeguarding measures put in place
- minutes of ASV meeting (if held)
- details of any disciplinary action / hearing (where relevant)
- outcome of police involvement (where relevant)
- final LADO outcome note

Details of how an issue was investigated and the outcomes should not be included on the child's file (as details of the staff member or volunteer need to be protected. Brief reference should be put on child's file so that records can be cross referenced if required at a later stage. We need to recognise that there is an increase in non-recent allegations and good recording keeping supports any current investigations immeasurably.

Child on child abuse

Similar guidance should be followed where there have been instances of child on child abuse or concerns reported about concerning or possibly abusive behaviour between pupils whether inside or outside School or online. ie

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of child(ren) concerned
- how the matter was investigated
- action taken
- risk assessment
- safeguarding measures put in place
- consultation with Safeguarding in Education Advisor / advice given
- contact with Children's Social Care
- contact with police (if relevant)

The relevant information should be recorded and retained on records for **both pupils** as well as copies of any referrals made.

The record of all pupils of concern held on CPOMS will be reviewed termly by the Safeguarding team.

Safeguarding Risk Assessment (Individual Pupil)

Name

Date of birth

Class / tutor group

Date of assessment

Carried out by

Reason for risk assessment

Category: personal safety / emotional safety / physical safety / other

Identifying the risks / evidence of concern

Assessing the risk **LOW** **MEDIUM** **HIGH**

Actions being taken / reducing the risk

Other professionals involved

Logged on system (date)

School report to Child Protection Conference or Looked After Child review

School	
Name of child	
Date of birth **Year group**	
Name of Form teacher/ Head of Section	

When completing the sections below consider issues such as attendance and punctuality; preparation for school / learning; general appearance; emotional presentation and wellbeing; indicators that child may have suffered harm / be at risk of harm; disclosures made by child; behaviour and social development; relationships with peers and adults; academic progress/ areas requiring improvement; contact with family; etc

What is working well?

What are we worried about?
What needs to happen?

Signature	
Print name	
Date	

Reports should be shared with families prior to the meeting except in exceptional circumstances

Please send this report wherever possible at least 5 days in advance of the relevant meeting to Childrensplanning@wandsworth.gov.uk and bring copies for those attending the meeting.

Appendix G - Guidance for schools re children who abuse other children (Child on child Abuse)

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this document 'child' refers to any child or young person up to the age of 18 years

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse, verbal abuse.

When dealing with such allegations, professionals should be mindful that there is significant research evidence to suggest that children who behave in a sexually inappropriate and / or aggressive way towards other children are often victims of abuse themselves.

There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

Process

When an instance of child on child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, a referral should be made to children's social care in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

Where the allegation relates to an incident that took place within the school, or relates to pupils attending the same school the school should

- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident (s)
- Keep a detailed log of actions, discussions and decisions
- Carry out a risk assessment and put a risk management plan in place if necessary – ensure that non-teaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either

directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening ,comments

- Contact parents where possible (unless advised otherwise, or serious concern re further risk to child or in particularly complex situations eg sexual exploitation – in these instances seek advice)
- Consider whether the situation warrants information being shared with other parents in the school (eg where press coverage is likely) and seek advice

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (eg related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

In such cases the needs of each child should be separately considered by social care. In cases where a significant incident has occurred or the alleged incident is of a serious nature the usual process will involve a separate strategy meeting in respect of each child, and s47 enquiries initiated, which will involve discussion with police (CAIT). Different social workers should be allocated for the child who is the victim and the child who has harmed, even if they are living in the same household. Police will decide whether an alleged offence should be subject to criminal investigation.

If the investigation / assessment concludes that the allegations are substantiated, the children should not necessarily be expected to continue their education in contact with each other. The child (ren) responsible for the abuse should be moved if necessary. The views and wishes of the child who has been abused and their parents should be appropriately considered in the decision making.

Once initial actions have been taken and processes are in place consideration should be given to the provision of ongoing support / counselling for the children involved, where appropriate / necessary.

Additional guidance is available via the London Child Protection procedures
http://www.londoncp.co.uk/chapters/ch_harm_others.html

Appendix H - Guidance for schools re child on child sexual violence and sexual harassment

Victims and alleged perpetrators

There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. For the purposes of this advice, we use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

We also use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised terms and the most appropriate to aid effective drafting of advice. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

Sexual violence and sexual harassment can occur between two children of **any age and sex.** It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Schools need to make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Children need to understand that sexual violence or sexual harassment will not be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys" and that challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts will not be tolerated as this risks normalising such behaviour.

We understand that such behaviours may reflect wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why a whole school/college approach (especially preventative education) is important.

Some pupils (eg those with SEND, or those who are LGBTQ+) can be particularly vulnerable. Schools also need to be aware that staff can also be victims of sexual violence or harassment and have strategies to protect staff .

<u>Sexual violence</u> refers to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person with his penis, that person does not consent to the penetration and he does not reasonably believe that they have consented.

Assault by Penetration: A person commits an offence if: s/he intentionally penetrates the vagina or anus of

another person with a part of her/his body or anything else, the penetration is sexual, that person does not consent to the penetration and s/he does not reasonably believe that they have consented.

Sexual Assault: A person commits an offence of sexual assault if: s/he intentionally touches another person, the touching is sexual, that person does not consent to the touching and s/he does not reasonably believe that they have consented.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 **can never consent** to any sexual activity;
- the age of consent is 16. However, it is recognised that between the ages of 13 and 16 sexual activity may be considered by the young people to be consensual. In cases where the sexual activity is mutually agreed and non- exploitative then it is not intended to instigate criminal proceedings. An assessment against risk factors should be carried out to assist in decision making in relation to safeguarding
- sexual intercourse without consent is rape.

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. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- upskirting (which is now a criminal offence under the Voyeurism Offences Act 2019) – this typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone, including pupils and staff, of any gender can be a victim of upskirting.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

Preventative programmes should be developed to be age and stage of development appropriate and tackle such issues as

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

Responding Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any report.

Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as children's social care and the police as required.

Disclosures from children should be dealt with sensitively in line with guidance about any safeguarding disclosures. The child should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL (or a deputy) should 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, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

The wishes of the victim in terms of how they want to proceed should be taken into account. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how things are being taken forward.

Appendix I - Children Missing from Education Policy

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Local Authorities (LA) have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. This requires a co-ordinated approach across schools, relevant LA sections and other agencies to ensure good monitoring systems are in place.

A child missing from education is a potential indicator of abuse or neglect. The school will follow their established procedure for unauthorised absence and for following up children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future. Missing from education includes children who are 'absent' from education, or those unexplainable and/or persistent absences particularly on repeat occasions or for prolonged periods.

The school has both an admissions register and an attendance register, and all pupils are placed on both registers (unless pupils are boarders). Pupils must be entered on the admissions register at the beginning of the first day on which the school has agreed or been notified that the pupil will attend the school. If the pupil fails to attend the school will undertake reasonable enquiries to establish their whereabouts.

The school will make reasonable enquiries (jointly with the LA) to establish the whereabouts of a pupil who ceases to attend, before deleting the child from roll if the deletion is under regulation 8(1), sub paragraphs (f)(iii) and (h)(iii) (see table below)

The school will always inform the LA of any pupil who is going to be removed from the admission register under any of the grounds listed in the regulations (see table below)

The notification will include:

a) The full name of the pupil
b) The full name and address of any parent with whom the child usually resides
c) At least one telephone number of the parent
d) The pupil's future address and destination school (if applicable)
e) The ground in regulation 8 under which the pupil's name is to be removed

The notification should be made as soon as the grounds above are met and prior to removal. This is essential so that the LA can take appropriate follow up action when required.

The school will also notify the LA within 5 days of adding a pupil's name to the admission register at a non-standard transition point. The notification will include all the details included in the admissions register. The school will also provide information about pupil admissions at standard transition points if requested to do so by the LA.

In line with the safeguarding duties of the school, all unexplained pupil absences will be investigated. The school must inform the LA of any pupil who fails to attend school, or has been absent without permission for a continuous period of 10 school days or more.

Established procedures will be followed, but each case needs to be treated on it's own merits, taking into account all the facts of the case. Some children are at particular risk, and may also need referral to social care.

Grounds for deleting a pupil of compulsory school age from the school admission register set out in the Education (Pupil Registration) (England) Regulations 2006, as amended	
	8(1)(a) - where the pupil is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the local authority for that named in the order or the order is revoked by the local authority on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.
	8(1)(b) - except where it has been agreed by the proprietor that the pupil should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that he has been registered as a pupil at another school.
	8(1)(c) - where a pupil is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that he has ceased to attend the school and the proprietor of any other school at which he is registered has given consent to the deletion.
	8(1)(d) - in a case not falling within sub-paragraph (a) of this paragraph, that he has ceased to attend the school and the proprietor has received written notification from the parent that the pupil is receiving education otherwise than at school.
	8(1)(e) - except in the case of a boarder, that he has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which he is registered.
	8(1)(f) - in the case of a pupil granted leave of absence in accordance with regulation 7(1A), that — (i) the pupil has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted; (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
	8(1)(g) - that he is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.

8	8(1)(h) - that he has been continuously absent from the school for a period of not less than twenty school days and (i) at no time was his absence during that period authorised by the proprietor in accordance with regulation 6(2); (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor of the school and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
9	8(1)(i) - that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the pupil will return to the school at the end of that period.
10	8(1)(j) - that the pupil has died
11	8(1)(k) - that the pupil will cease to be of compulsory school age before the school next meets and (i) the relevant person has indicated that the pupil will cease to attend the school; or (ii) the pupil does not meet the academic entry requirements for admission to the school's sixth form
12	8(1)(l) - in the case of a pupil at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a pupil of the school
13	8(1)(m) - that he has been permanently excluded from the school
14	8(1)(n) - where the pupil has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school
15	8(1)(o) where— (i) the pupil is a boarder at a maintained school or an Academy; (ii) charges for board and lodging are payable by the parent of the pupil; and (iii) those charges remain unpaid by the pupil's parent at the end of the school term to which they relate

Appendix J - Policy on Procedures When a Member of Staff, Volunteer, Contractor, Trainee Teacher, DSL, Proprietor or Head Faces Allegations of Abuse (Including Reporting Form)

This policy is made available to all staff at Hurlingham School.

1. Introduction

The most recent guidance on this issue is to be found in Keeping Children Safe in Education (September 2026).

Working Together to Safeguard Children 2026 requires local authorities to designate an officer or team of officers to deal with the management and oversight of allegations against people who work with children.

Allegations that a member of staff, volunteer, contractor, or trainee teacher has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

We will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. We undertake to take any allegation of abuse, involving a member of staff, volunteer, contractor, or trainee teacher, very seriously

The member of staff who is informed of the allegation must:

- Record the information (it may be more appropriate to do this immediately after the meeting depending on the state of the person making the allegation). This need only be the bare facts and a synopsis of what was actually said.
- Do not grill the person making the allegation.
- Do not promise to keep it confidential.

An allegation of such seriousness must normally be made directly to the DSL; but if another member of staff, preferably the Head, is told first, he/she must ensure that the DSL is informed immediately.

If the DSL is unavailable the Head should be told at once.

If the DSL is involved then the referral should be made direct to the LADO by the Head.

The DSL will tell the Head unless he is personally involved in the allegation in which case the DSL will inform the Principal.

Where there is a conflict of interest in reporting the allegation to the Head, staff will report the concern directly to the LADO preferably involving the Principal if deemed appropriate. Information regarding the identity of the LADO can be found on the LA's website or at the start of this policy.

If the Head or Principal/Proprietor is involved, then the referral should be made directty to the LADO by the member of staff or DSL.

For allegations involving contractors, the school remains responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action.'

In no circumstances will the school decide to cease using a supply teacher over a safeguarding concern without first finding out the facts and liaising with the LADO to determine a suitable outcome.

When managing allegations against staff, volunteers, contractors, or trainee teachers, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

2. The First Response

The Head will first try to establish and record the following information before contacting the Local Authority’s designated officer on **Tel: 020 8871 7961** (or in the most serious cases, the police) which he will do without delay.

- Who made the allegation and the nature of it.
- When and where it happened.
- Who was involved.
- Whether there were witnesses and who else knows.
- Any past history and/or relevant documentation.

When the Head contacts the Safeguarding in Education Officer they will discuss whether it is appropriate given the circumstance of the individual allegation to:

- Tell the pupils’ parents; in which case the Head will inform the child’s parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents, in which case we will contact the Children’s Specialist Services (previously Social Services) before making contact.
- Tell the member of staff about whom the allegation has been made and if so will advise him or her to contact their Trade Union or Professional Association for advice and support,
- To involve Children’s Services or the Police
- To suspend the member of staff involved
- If the matter should be dealt with through the internal disciplinary process

Once informed, the Safeguarding in Education Officer and the Local Authority Designated Officer (LADO) are effectively in charge of managing the allegation but the Head is responsible for looking after the interests of the School.

<u>The School will not undertake an investigation into the allegations without prior consultation with the local authority designated officer or team of officers (LADOs), or in the most serious cases, the police, so as not to jeopardise statutory investigations.</u>

3. The Next Step

Although a formal investigation is a matter for specialists, where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, we will always:

- Invite the police to conduct the investigation,
- Consider suspending the member of staff (or volunteer) concerned.

If the matter is handed back to the School to manage:

The Head must take appropriate action within 3 working days and the disciplinary hearing must be held within 15 working days unless further investigation is required in which case this should be completed within 10 days.

Following completion of the further investigation, the Head will decide whether to hold a disciplinary hearing within 2 working days and must hold it within 15 working days.

4. Support for the Pupil

Our priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The Head, together with the DSL, will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians and the Wandsworth Safeguarding Children Partnership (WSCP). The WSCP is a new organisation launched on 12 July 2019, jointly led by the Police, Clinical Commissioning Group and the Council. They are responsible for protecting children and young people in Wandsworth from harm, abuse, neglect and exploitation, and promoting their welfare.

1. Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step, and we will take legal advice beforehand, and will normally only suspend a member of staff where:

- There is a serious risk of harm (or further harm) to the child,
- The allegations are so serious as to constitute grounds for dismissal, if proven,
- The police are investigating allegations of criminal misconduct.

We recognise fully that we have a duty of care towards all of our staff, and we will always:

- Keep an open mind until a conclusion has been reached.
- Interview a member of staff before suspending him or her.
- Keep him or her informed of the progress of the investigation.

Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a friend or Trade Union representative.

6. Alternatives to Suspension

We will always consider whether an alternative to suspension might be appropriate.

Possibilities include:

- Sending the member of staff on leave,
- Giving him or her non-contact duties,
- Ensuring that a second adult is always present in the classroom when he or she teaches.

7. If the Member of Staff Resigns

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. Our policy is always to complete every investigation into allegations of child abuse.

8. Settlement Agreements

The policy at Hurlingham school is to follow the DCSF guidance set out in "Safeguarding Children and Safer Recruitment in Education" on the use of settlement agreements in cases of child abuse.

9. Length of Investigatory Process

We recognise that everyone's interests are served by completing any investigatory process as swiftly as possibly. Hurlingham School is a small community and we will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. We would expect almost every case to be completed within one month.

10. Referral to the Disclosure and Barring Service and the Teaching Regulation Agency (TRA)

Like all schools, we have a statutory legal duty to refer an individual, where there is the risk that he or she may harm, or has caused harm to children, to the Disclosure and Barring Service (DBS) within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. Reports concerning members of staff or volunteers are normally made by the CPO. If the CPO is involved, the report is made by the Head. If the Head is involved, the report is made by the Principal.

The referral form can be downloaded from the TRA on https://www.gov.uk/government/publications/teacher-misconduct-referral-form . The school plays no part in the subsequent process of barring individuals from working with children and/or vulnerable adults. We also have a legal duty to respond to any requests for information that we receive from the ISA at any time.

The School will consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. This may also be appropriate if a dismissal does not reach the threshold for DBS referral.

The reasons such an order would be considered are:

- unacceptable professional conduct
- conduct that may bring the profession into disrepute
- conviction, at any time, for a relevant offence.

In the event that an individual is referred to the DBS, it is not necessary to report to the TRA as well as the two bodies share information.

11. Recording Allegations of Abuse

We will record all allegations of abuse, and our subsequent actions, including any disciplinary actions, on an individual's file. A copy will be given to the individual and he or she will be told that the record will be retained until he or she reaches statutory retirement age, or for ten years, if that is longer. Records relating to malicious allegations will be removed from the personnel records. Unfounded or malicious allegations will not be included in references no matter how many there have been.

12. Anonymous Allegations

If we are faced with an anonymous allegation of child abuse which names both a member of staff and a child, we will handle it in exactly the same way as if we knew the identity of the person making the allegation. We will report the matter to the Wandsworth Safeguarding Children Partnership (WSCP) and be guided by them in our handling of the allegation. Where the allegation names the member of staff; but not the pupil, we will normally interview the member of staff, and ask for his or her version of events, unless the WSCB has advised a different course of action. It could be appropriate to establish a mentoring or review

programme for that individual, or to provide him or her with further training. A record would normally be kept.

2. Handling Unfounded of Unsubstantiated Allegations

13.1 The Child

A child who has been the centre of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. We will liaise closely with the WSCB to set up a professional programme that best meets his or her needs, an Educational Psychologist, as well as support from a School Counsellor. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help him/her to achieve as smooth a transition as possible, working closely with the parents or guardians.

13.2 The Member of Staff

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun him/her on the grounds of "no smoke without fire". If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that he or she is likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of re-training may be appropriate.

3. Allegation of Abuse of a Child who is not a Pupil at the School

If we were given information that suggested that a member of staff was abusing a child who was not a pupil at Hurlingham school, we would immediately pass such information to the Wandsworth Safeguarding Children Partnership (WSCP) to handle. We would then interview the member of staff and formally advise him/her of the allegations, making it clear that the school would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc in exactly the same way as if the allegation had involved a school pupil. If the allegation subsequently proved to be unfounded, he or she would be given full support by the school in resuming his/her career.

4. Allegations Involving the Head or Child Protection Officer (DMO)

The Principal should be told at once by the DSL of any allegation involving the Head. She will obtain legal advice before proceeding to the steps outlined above. The Head will normally be suspended for the duration of the investigatory process, and one of the Deputy Heads will be made acting Head until the conclusion of the investigation and resolution of the issue.

The Head should similarly be told at once of any allegation involving the DSL. The Principal should normally be informed on the same day, and legal advice obtained. The DSL will normally be suspended for the duration of the investigatory process. The Head or a Member of the SLT who has been fully trained in Safeguarding and Child Protection should be made acting DSL until the conclusion of the investigation and resolution of the issue.

5. Anonymity

Section 13 Education Act 2011 came into force on 1 October 2012.

Where a pupil at a school makes an allegation against a teacher (not support staff) that a criminal offence has taken place, no information can be published that would lead to the identification of that person before they are charged or summonsed. It is a Criminal Offence to publish the identity of the individual ie. Website, Facebook, Twitter etc. This applies to all members of the school community including parents and pupils.

Date of creation: September 2009
Date of last review: September 2026

Date for next review: July 2027

AGENCY REPORTING FORM FOR ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN WITHIN THE LONDON BOROUGH OF WANDSWORTH

WHEN TO USE THIS FORM

This form must be filled in and sent to the Wandsworth MASH in every case where it is alleged or there are concerns that a person working with children has:-

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Every incident should be recorded on this form and reported to the Wandsworth MASH.

If you are unsure as to whether the incident or concern needs to be referred, please ring the LADO to discuss. The LADO can be contacted on LADO@richmondandwandsworth.gov.uk or LADO@wandsworth.gov.uk – or 0208 8717440

If the matter is serious or there are **immediate** concerns for the child's safety or wellbeing, the referral must be made to Wandsworth MASH. MASH@wandsworth.gov.uk – 0208 8716622

If you do not have any relevant information for specific sections, please make this clear.

All allegations must be reported to the Wandsworth MASH within 24 hours (Working Together, Statutory Guidance, DfE, 2018)

You wil be asked to provide associated relevant documentation once the information has been evaluated by the LADO. You will be advised regarding the appropriate action to be taken.

AGENCY Details

Date of referral	

Referrers name	
Referrers job title	
Place of work & address	
Tel number	
Email	
Best contact times	
Who is your Designated Manager/Child Protection Lead	
If a school, please give contact details of Head and Chair of Governors	
Status of organisation e.g. LA, private, voluntary, etc	
Who is your HR lead for allegations against staff	

Allegation Details

Date of alleged incident	
Date allegation reported to referrer	
Category of Abuse Alleged – please tick	Physical Emotional Sexual Neglect

Does this referral concern mishandling of medication – if so, please give details of medication concerned and purpose of the medication	
Who has made the allegation e.g. child, parent, other professional etc	
How was the allegation e.g. in person, by phone, letter and to whom	
Who else has been informed regarding allegation	
Full details of allegation	
Where is it alleged the incident took place	
What action if any has been taken regarding the allegation	
Is there an allegation of an injury and if so pl describe	
Has a member of staff seen the injury, if so, they may be asked to complete a body map diagram	

If injury has parent been advised to take child to GP and if so, have they done so?	
Are written incident reports available and if so by whom; please supply	
Are there witnesses to the alleged incident; please give details	
If there has been a delay in reporting the allegation state why	
Are the parents/carers of the child aware of the allegation and if so state when /their views	
Is the child aware of the referral and if so when, and what their views are	
Did an allegation of physical abuse follow an authorised / unauthorised restraint?	Yes No
If the allegation relates to restraint has staff member had Team Teach or similar training and when	

Details of person/s subject to the allegation please repeat box if more than one person

Person subject to allegation known/unknown	
First name	
Surname	
Title	
Job title	
DOB	
Home address	
Ethnicity	
Length of employment	
Date of last DBS	
Details of references taken up	
What is the status of the employment e.g. f/t, p/t, agency, volunteer etc	
If agency etc please give contact details	
Have they been subject to previous allegations and if so, please provide full details	
Are there any other concerns/issues of	

relevance regarding this person	
Does this person work in any other capacity with children either paid/unpaid?	
Does this person have children of their own? If so, please provide name(s), DOB(s) and address details	
Has the person been suspended/advice taken from HR	

Details of potential victim/child please repeat box if more than one child

Alleged victim known or unknown/no victim	
First name	
Surname	
DOB	
Gender	
Ethnicity/Religion	
Home address/tel.	
Parent's/carers names/contact details	

Who has PR for the child	
First language of child and parents/carers – is an interpreter required	
Issues of disability/communication/literacy for child or parent/carer	
Any other family members/significant persons for this child	
Has the child made a previous allegation and if so, please give details	
Is/has this child been Looked After or subject to a Child Protection Plan, Child in Need Plan	
GP / Health Visitor / School Nurse details	
Are there any known concerns about this child / young person	
Other information of relevance re this child and the allegation	

Please give details of any other information of relevance

Referrer's name:

Referrer's signature:

(please add electronically)

Date:

Appendix K - Prevent Strategy – information and referrals flowchart

What is 'Prevent'?

'Prevent' is part of the government's counter-terrorism strategy, CONTEST. The aim of the 'Prevent' strategy is *"to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism."*

The *Counter-Terrorism and Security Act 2015* gives the 'Prevent' strategy legal status in that schools and colleges in England and Wales are now obliged by statute "to have due regard" to the need to prevent people from being drawn into terrorism. The Prevent strategy explains that *"schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol."*

What is 'extremism' or an 'extremist'?

No legal definition but the Prevent strategy document defines extremism as *"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*." The document also includes in its definition of extremism *"calls for the death of members of our armed forces, whether in this country or overseas."*

What is radicalisation?

Although the percentage of people prepared to support violent extremism in this country is very small, it is significantly greater in young people.
Radicalisation is driven by a belief which supports the use of violence. We do not need to understand the ideologies or ideas that are promoted, more the way they hook into the susceptable.

What is 'Channel'?

The Association of Chief Police Officers (ACPO) guidance, Prevent, Police and Schools, describes Channel as *"a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorist-related activity."*

Safeguarding in *Prevent*

Prevent is just another form of safeguarding, a way of offering support and intervention if someone is on a pathway to extremism. Radicalisation is a process and is it is unlikely that one single event will trigger a person to become radicalised and support violent extremism. *Prevent* can help steer a person away from embracing violence as a solution to the grievances they hold, whether motivated by politics or religion.

If concerns have been raised about a child, then the first person to notify is the DSL for the relevant site (Prep School or Nursery) who can make an assessment based on the information available. They may ask to speak to the child or young person themselves to pose a series of informative questions to ascertain if it is an isolated incident or indicative of a more worrying mind-set.

Remember, they may hold information you are not aware of, so it is always advisable to report concerns, however minor they may appear at first glance.

What is our role as a School and your role as teachers in the context of Prevent?

Teachers' main responsibility in relation to the Prevent strategy is to protect children from extremist and violent views by:

1. having awareness of 'Prevent' and "the risks it is intended to address";
2. ensuring that children are taught "in a way that is consistent with the law and our values"; and
3. helping to identify and refer to the relevant agencies "children whose behaviour suggests that they are being drawn into terrorism or extremism".

As a school it is important for us to ensure that the *Prevent* strategy does not reduce or constrain opportunities for 'safe' and educational debate. Pupil need opportunities within appropriate subjects, curricula opportunities, or forms to express views, seek advice and have questions answered. They require the opportunity to explore the issue of diversity, human rights and understanding Britain as a multi-cultural society.

We need to ensure that we provide a learning environment for thinking and questioning, whilst promoting the importance of 'British Values' to include democracy, tolerance and respect for the rule of law, in which our pupils can raise controversial questions and concerns without fear of reprimand or ridicule.

It is our job to:

- explore and promote diversity and shared values between and within communities.
- challenge Islamophobia, anti-Semitism, far-right ideologies and other prejudices.
- support all children's and young people's sense of belonging in 21st century Britain and enable children and young people to develop respect for themselves and form mutually respectful, inter-cultural relationships with others.
- help pupils to develop knowledge of religion, history, geography, citizenship, English (particularly the critical study of the media) and analyse current issues of concern;
- help pupils to develop the skills needed to evaluate effectively and discuss potentially controversial issues;
- provide safe spaces for pupils to discuss openly issues that concern them including exploring their own identities and how these relate to the diversity of the society in which they live;
- support those at risk of being isolated or becoming disaffected from their learning or their peers by talking to relevant people (e.g. the DSL) about individual education plans or multi agency support plans.

It is vital that as a whole school we 'address issues of disparity and commonality and how we live together' and that, as teachers, you are confident in tackling controversial issues to challenge any misconceptions.

What are the risk factors that you may be expected to look for in individual pupils?

The Prevent duty guidance is lacking in detail and does not address this point. However, previous guidance from the Department for Children Schools and Families (DCSF) Learning together to be safe states that *"there is no obvious profile of a person likely to become involved in extremism and there is no single indicator of when a person might move to adopt violence in support of extremist ideas."*

As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately**. Even very young children may be susceptible to radicalisation by others, whether in the family or outside, and display concerning behaviour.**

The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

Recognising Radicalisation

The following signs and behaviours could indicate vulnerability:

- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Pupils accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Pupils voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Cultural and/or religious isolation
- Sudden change in religious practice
- Violent/ rhetoric language
- Hate rhetoric
- Political activism

Many of these the elements are really going to be more appropriate to older children but those which are perhaps most relevant to us and the children within Hurlingham are:

Cultural and/or Religious Isolation
This means that a person will try to avoid people who are not from the same cultural or religious group. At its most extreme there will be no contact with anyone outside of the person's culture and/or religious group. They will actively avoid socialising with diverse or different groups.

Examples are:

- Someone who follows Nazi ideology will avoid people who are not white or someone who they believe may be homosexual. This is because Nazism promotes racism and homophobia.
- People who follow the teachings of a group like Al Qa'ida/ISIL/Daesh will want to avoid anyone from different religions because Islamist inspired ideologies teach hatred and mistrust of other faiths.

However, it should be noted that strong religious observance is also a strong protective factor against engaging in risk-taking behaviour for many young people and a deep or strong understanding of their religion will protect an individual from being drawn in by abusive narratives and misinterpretations of that religion.

It is when religious knowledge is poor, that a person becomes more susceptible to incorrect interpretations of that religion.

Sudden Change in Religious Practice
The key issue here is the increase in religious observance (i.e. becoming more religious) when combined with a limited or poor religious understanding. Especially when the version of the religion comes from a violent extremist ideology.

Violent Rhetoric/Language
Just being exposed to violent language is not the issue. The key problem here is extensive and prolonged engagement with violent rhetoric that promotes the use of violence against specific groups and justifies the use of violence against those groups. Exposure to this rhetoric will influence the decision to see violent extremism as a legitimate response against those groups.

One example is David Copeland (the 1999 London Nail Bomber) who spent many months immersed in Nazi thinking and came to believe it was not only OK, but actually necessary, to attack people who were of a non-white ethnic background or who were homosexual.

If a child is being exposed to this kind of constant violent language, then it will appear in both their normal conversation and in the seeking out or possession of material that contains this same violent language, often from the Internet.

Hate Rhetoric
Hate, specifically hatred of the 'other' (i.e. the target group), sustains violent extremism. It could be hatred of:

- a particular religious group
- 'The West'
- a particular culture
- a nationality
- a government

The use of language by a person or group that generates hatred and dehumanises any other individual or group indicates an increased risk of violent behaviour.

The use of such language will create the impression that such beliefs are normal and acceptable. This will be expressed in both casual conversation and the seeking out or possession of material containing similar hate rhetoric.

Political Activism
Prevent is not opposed to political activism; in fact a democratic society openly encourages such activism.

However, when a person demonstrates an increased political awareness on issues that are championed by extremist groups, **as well as a motivation to act on that awareness**, we might have cause for concern.

Increased political awareness and criticism of any Government's policies is ***not*** a measurement for assessing a person's vulnerability to recruitment by extremists.

It is important to remember:

- All of these factors are based on 'real-world' first-hand research and interviews with convicted terrorists, extremists and radicalisers.
- CHANNEL referrals have emerged as young as 13 years old, with instances of Primary Schools having been specifically targeted by violent extremists to be recruited at a very young age.
- In addition, a child that develops in a family environment with a violent extremist mind-set is more likely to mirror those views.

Once a child expresses physical evidence (in what they say, write, draw or view online) of an extremist ideology then there is a chance that they are being drawn towards that ideology.

At the very least, they may have an unhealthy interest in a subject that glorifies violence and hatred and this should be cause for concern from a safeguarding perspective.

Extremism flourishes where intolerance is allowed to prevail. A sense of 'the other' can restrict integration and create a mind-set that views hostility against those with different beliefs and backgrounds as acceptable.

It is important to differentiate between a lack of understanding of alternative faiths and cultures and an active avoidance of and hostility towards them.

Appendix L Staff Behaviour (Guidance for Staff on Safe Working Practice in School)

Primarily all staff must adhere, at all times, to the Staff Code of Conduct which can be found in the Staff Handbook.

Restrictive Interventions, including Physical Restraint

Our policy on Restrictive Interventions, including Physical Restraint, by staff is set out in a separate document and acknowledges that staff should only use physical intervention in particular circumstances, and that even when necessary the minimum force should be used to prevent harm to the child or another child or adult.

Risk assessments will be carried out where individual pupils have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers

Physical intervention which causes injury or severe distress to a child may have to be considered under child protection or disciplinary procedures.

Please refer to our full policy on ***'Restrictive Interventions*** for additional guidance.

Staff Safeguarding themselves and Colleagues - Avoiding allegations of child abuse

Because teachers and school staff have daily contact with children in a variety of situations, including the caring role, they are vulnerable to accusations of abuse.

Teachers may unknowingly place themselves at risk of being accused of child abuse under the specified headings, for example:

Neglect can include failings of a teacher if a child's intellectual development suffers some impairment, because the Children Act has a wide definition of "development".

Development, in the Children Act, can extend to physical, intellectual, emotional, social or behavioural development.

Physical can extend to any physical intervention by a teacher on a pupil. It does not have to amount to punishment, deliberate or formal. For example, guiding a pupil out of a classroom, throwing any object at a pupil, pushing a child's shoulders gently to encourage them to sit down and putting a hand up to prevent a child from running away have all resulted in complaints of abuse against teachers. An allegation could result in a criminal action.

Sexual is clearly the form of abuse which carries with it the greatest fear and stigma and the most extreme results. An allegation of sexual abuse can be made against a teacher in what may seemingly amount to quite innocent circumstances, such as towelling young children down after swimming, kissing or embracing a child in an effort to comfort or console, touching or cuddling. Teachers must always remember that they are professionals and must always act as such. It may be inappropriate for teachers to exhibit a physically-comforting role because a child may not be used to such affection at home or it may be alien, hostile or even threatening to a child. (Sexual abuse can, of course, also amount to a criminal offence).

Emotional can include an allegation made by a child of harassment or victimisation where the child perceives a teacher to be constantly correcting or criticising them.

Situations to be avoid by all staff (whether employed, contracted a volunteer or student)

Where independent evidence is available, an allegation can be investigated and cleared up quickly. If there is no such evidence, further investigation will be required and it will be more difficult to establish whether the teacher or the child is telling the truth.

This is why it is extremely important to have an independent witness in all the following situations:

- **Where a child is distressed** or shows a need for physical comfort, it is vital that any demonstration of professional comfort should only take place either in a classroom situation or in front of another appropriate senior member of staff.
- **Where a teacher has to administer medicines or first aid** in an emergency, it is always prudent – whenever possible – for another responsible adult to witness this. This is to corroborate the teacher's diagnosis and assessment of the situation and to witness the administration of treatment to the child.
- **Where force must be used to avert an immediate danger** either inside or outside the classroom, it may not always be practicable to ensure that a witness is present. Nevertheless, the importance of the independent witness is to verify the "immediate danger" as perceived by the teacher. Where intervention results in physical contact with a pupil, this information could be used as a defence to an allegation of assault. The teacher's actions must be held to be reasonable, taking into account the immediacy of the danger and the risk the action was intended to avoid. An independent witness can corroborate the teacher's version of events and can counter any allegation of assault made by the pupil.
- **Where pupils are taught on a one-to-one basis by members of staff** such as individual music lessons or learning support provision. Teachers must ensure that any such teaching only takes place in teaching spaces with glazed viewing panels in either the wall or door. Should, for some reason, this not be possible, then the door to the room must be left open.
- **Where teachers must operate in a one-to-one situation under any circumstances:** a pupil at school, off site, at home, a special unit or in any form of transport (including private cars) between any of these, it is important that a responsible adult should be available to verify the purpose and nature of the tuition. For example, a senior teacher, available parent or other adult could be alerted to the potential risk placed on the teacher by a one-to-one situation and it would be wise to ask for a discreet presence to be maintained without prejudicing the child's need for confidentiality or individual attention. It is always unwise for a teacher to suggest or propose additional tuition at the teacher's home. Any additional tuition must take place in school or the child's home after consultation with the parent and the Head. When teachers find themselves in a one-to-one situation with a pupil, the door to the room should always be open. Unless dealing with a *real* emergency (such as a child's broken limb), staff should *never* find themselves in a one-to-one situation with a pupil in a changing room or toilet area.
- **When teachers participate in extra-curricular activities**, the risk of allegations of abuse increases as the teachers move away from structured professional classroom situations. Where there are after-school activities and school trips, it is important that another teacher, responsible adult or parent accompanies the party to ensure that the teacher is not placed in a potentially exposed position. The additional adult would provide evidence if a child accused a teacher of unprofessional conduct. It may also provide the teacher with support when a child's irrational or unusual behaviour becomes cause for concern.
- **All electronic communication between a member of school staff and a pupil** *must* be through the Hurlingham School webmail. *No* pupil should be told any other e-mail address for any member of staff. Staff should not engage in any form of activity on a "Social Networking" site such as Facebook with *any* pupil. If in any doubt staff should consider blind copying their Head or Head of Section in on any electronic communication with children.

All reports of any allegation made by one teacher to another or made by other children to a teacher must be taken up with the DSL at once who will in turn liaise with the Head. Any member of staff who is seriously concerned about the physical or emotional wellbeing of a child should report this to the DSL

who will liaise with the Head. Staff have a duty to report such concerns. They must not be bound by promises of confidentiality and should be wary of making any such promises.

The DSL and Head, after discussion with relevant staff, will be responsible for taking appropriate action.

The Safer Recruitment Consortium has recently updated original DfES Guidance on Safe Working Practice for professionals working in education settings. The revised guidance can be found here:

http://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf

Appendix M - Self-Harm Policy

1. Introduction

Recent research indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. School staff can play an important role in preventing self-harm and also in supporting students, peers and parents of students currently engaging in self-harm.

2. Scope

This document describes the school's approach to self-harm. This policy is intended as guidance for all staff including non-teaching staff and governors.

3. Aims

- To increase understanding and awareness of self-harm
- To alert staff to warning signs and risk factors
- To provide support to staff dealing with students who self-harm
- To provide support to students who self-harm and their peers and parents/carers.

4. Definition of Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

5. Risk Factors

The following risk factors, particularly in combination, may make a young person particularly vulnerable to self-harm:

Individual Factors:

- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills

•Hopelessness

•Impulsivity

•Drug or alcohol abuse

Family Factors

•Unreasonable expectations

•Neglect or physical, sexual or emotional abuse

•Poor parental relationships and arguments

•Depression, self-harm or suicide in the family

Social Factors

•Difficulty in making relationships / loneliness

•Being bullied or rejected by peers

6. Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from the DSL.

Possible warning signs include:

•Changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)

•Increased isolation from friends or family, becoming socially withdrawn

•Changes in activity and mood e.g. more aggressive or introverted than usual

•Lowering of academic achievement

•Talking or joking about self-harm or suicide

•Abusing drugs or alcohol

•Expressing feelings of failure, uselessness or loss of hope

•Changes in clothing

7. Staff Roles in working with students who self-harm

Students may choose to confide in a member of school staff if they are concerned about their own welfare, or that of a peer. School staff may experience a range of feelings in response to self-harm in a student such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to students it is vital to try and maintain a supportive and open attitude – a student who has chosen to discuss their concerns with a member of school staff is showing a considerable amount of courage and trust.

Students need to be made aware that it may not be possible for staff to offer complete confidentiality.

If you consider a student is at serious risk of harming themselves then confidentiality cannot be kept.

As with all safeguarding matters, It is important not to make promises of confidentiality that cannot be kept even if a student puts pressure on you to do so. Any member of staff who is aware of a student engaging in or suspected to be at risk of engaging in self-harm should consult the school's DSL or the Head.

Following the report, the DSL and/or the Head will decide on the appropriate course of action. This may include:

- Contacting parents / carers
- Arranging professional assistance e.g. doctor, nurse, social services
- Arranging an appointment with a counsellor
- Immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- If a student has self-harmed in school a first aider should be called for immediate help.

8. Further Considerations

Any meetings with a student, their parents or their peers regarding self-harm will be recorded in writing including:

- Dates and times
- An action plan
- Concerns raised
- Details of anyone else who has been informed

This information will be stored in the School's safeguarding file. It is important to encourage students to let you know if one of their peers is in trouble, upset or showing signs of self-harming. Friends can worry about betraying confidences so they need to know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action & being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult the DSL.

When a young person is self-harming it is important to be vigilant in case close contacts with the individual are also self-harming. Occasionally schools discover that a number of students in the same peer group are harming themselves.

Date created: Autumn 2014

Date of last review: September 2026
Date of next review: July 2027

Appendix N - Use of Mobile Phones and Cameras

This appendix should be read in conjunction with the separate school documents *Taking, Storing and Using Images of Children*, *Social Media and Mobile Devices in School Code of Conduct for Parents and Visitors* and the Staff Code of Conduct.

Electronic devices (including, but not limited to, mobile phones and cameras) should only ever be used to take photographs, videos or other recordings of children if the equipment is the property of the school and the children are made aware that their image, voice or both are being recorded.

As soon as the electronic file has been created, it should be transferred onto the relevant area of the school network media drive at the first possible opportunity and the file on the device should then be deleted. The file should only be retained on the school media drive for the time duration of its potential reasonable use in school. If it will no longer be used, it should be deleted.

Portable storage devices must be manually scanned with the school's anti-virus software before any files are transferred or opened. If you are unsure of how to do this, please ask the Head of Media and Computer Resources. Data should only be temporarily stored on portable storage devices and in accordance with the school's data protection policy and should be encrypted.

No images of children should ever be uploaded to photo or video sharing sites.

No applications within mobile telephones which make use of the device's audio or video recording features, whether those recording facilities are intended to be used or not, should <u>ever</u> be activated in a room where EYFS (Nursery and Reception) children are present.

<u>Mobile Telephones</u>

<u>No mobile telephones should ever be taken into an area of the school where EYFS (Nursery and Reception) children are present.</u>

Staff are permitted to have their mobile phones turned on during the school day but the phone must be set to silent and should only ever be used in the staffroom or an empty classroom. It is inappropriate to receive calls, read texts or use a mobile phone when children are present or school business is being conducted unless the communication in question is both urgent and school-related. Any calls made or received during the day should be dealt with quickly and should not take up valuable time which could be used for teaching, planning or other work commitments.

Should a member of staff wish to use their mobile telephone for a teaching purpose relevant to the lesson being undertaken (for example, to conduct a piece of internet research and no other device is available to them,) this is acceptable providing there are no children of EYFS age present, and the teacher clearly articulates what they are doing, in real-time as they do it, and tells the children why they are doing it.

Children must never be photographed by cameras built into mobile phones; the only exception may be for the use of school owned property which should then be returned to the Head of Computer and Media Resources.

<u>Cameras</u>

The only cameras used in school should be school property; staff should <u>not</u> use their own devices.

Should a photograph or video of a child be taken using a digital camera, the image or video file must be transferred onto the school network media drives at the first possible opportunity and the file on the camera

must then be deleted. No images or films of children should ever be uploaded to photo or video sharing sites.

Appendix O - Reference Documents

London Child Protection Procedures, 5th edition

available electronically via Wandsworth Safeguarding Board website www.wscb.org.uk and London SCB website – www.londonscb.gov.uk

London Safeguarding Children Board supplementary procedures

These provide detailed information related to specific safeguarding issues. They are available via the London SCB website (as above).

Keeping Children Safe in Education

Keeping Children Safe in Education 2026

Or via www.gov.uk/government/publications

This guidance contains links to guidance and advice about many of the key specific safeguarding issues.

Working Together to Safeguard Children 2023

What To Do If You Are Worried a Child Is Being Abused

What to do if you are worried – revised guidance for all professionals to use if they are worried a child may be being abused

Information Sharing Guidance

Information Sharing Guidance 2015 – revised guidance on information sharing for all professionals

Managing Allegations Against Staff

WSCB guidance, available on WSCB website. www.wscb.org.uk

Children Missing from Home and Care

WSCB procedures, available on WSCB website www.wscb.org.uk

Positive Handling

WSCB guidance, available on WSCB website www.wscb.org.uk

Sexual exploitation

WSCB protocol and guidance, available on WSCB website www.wscb.org.uk

Domestic Violence – guide for schools

Wandsworth guidance issued June 2012

Thresholds for Intervention – Multi-Agency guidance

Wandsworth Guidance updated 2020, available on WSCP website www.wscp.org.uk

Counselling in Schools: a blueprint for the future (February 2016)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

Mental Health and Behaviour in schools – departmental advice for school staff

DfE guidance, issued June 2014

DFE-00435-2014 www.gov.uk/government/publications

Whistleblowing policy – Wandsworth Council HR or general guidance can be found at https://www.gov.uk/whistleblowing

DfE advice for schools: teaching online safety in schools

UK Council for Internet Safety (UKCIS) guidance: Education for a connected world

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people

The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

National Crime Agency's CEOP education programme: Thinkuknow

Public Health England: Every Mind Matters

Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

LGFL 'Undressed' provides schools with advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

The NSPCC what you can do to report abuse dedicated helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. NSPCC Whistleblowing Advice Line: 0800 028 0285 (8am-8pm Mon-Fri, 9am-6pm Sat-Sun). Email: help@nspcc.org.uk

Vulnerable Children in a Digital World

Adrienne Katz and Dr Aimen El Asam in partnership with Internet matters.org

Wandsworth Safeguarding Children Partnership – published arrangements 27th June 2019

Appendix P - Low-Level Concerns and Self Referral Policy

Hurlingham School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

We pride ourselves on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children. A good low-level-concerns culture achieves a great deal, helping identify any weakness in the school safeguarding system.

Definitions

For the purposes of this policy, a **low-level concern** is defined as any concern about an adult's behaviour towards, or concerning, a child that does not meet the harm threshold, or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Staff Behaviour (Guidance for Staff on Safe Working Practice in School) in Appendix L of this policy.

Low-level concerns are differentiated from concerns that can cause **harm**. The harm threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the Staff Behaviour (Guidance for Staff on Safe Working Practice in School) in Appendix L of this policy, as well as the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all

individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Head or DSL immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than **24** hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report Low Level concerns to the Head or either of Deputy Heads verbally and DSL in person. When submitting concerns, staff will take care to ensure that they observe the Allegations of Abuse Against Staff Policy (Appendix J) and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy (contained within the Staff handbook), staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Head, it should be reported to the DSL who will (if appropriate) inform the Principal.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Head, who will, in turn, inform the employer of the subject of the concern.

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct or violates the Staff Behaviour Guidance.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Evaluating concerns

Where the Head is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the headteacher will discuss the concern with the DSL, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. The Principal will be informed of all concerns raised. When seeking external advice, the Head will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Safeguarding and Child Protection Policy, at all times.

To evaluate a concern, the Head and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Speak to any witnesses.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

Acting on concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Head will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Head will discuss the concern with the DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL, Head and Principal will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

Where the Head determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
  - Talk to the individual in a non-accusatory and sympathetic manner.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.
  - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
  - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct and/or the Staff Behaviour (Guidance for Staff on Safe Working Practice in School), depending on the nature of the concern.
- The DSL, Head and Principal will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the Head will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

When a low-level concern has been raised by a third party, the head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

The Head will ensure that all details of the low-level concern, including the name of the person reporting (respecting wishes to remain anonymous as far as reasonably possible) any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The Head will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their

attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

Low-level concerns which are shared about supply staff, trainee teachers and contractors will be notified to their employers/regulatory bodies, so that any potential patterns of inappropriate behaviour can be identified.

If we are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with our LADO.

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

Where the concern is serious

The Head may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Head will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Head will ensure that all records include the most accurate and up-to-date information and will store them in the secure CPOMS platform. The Head will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Head and Principal to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff

personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

Consideration will be given as to whether any wider cultural issues exist in School which enabled the behaviour to occur and whether any policy revisions or additional training should be implemented in order to minimise the risk of recurrence.

All rationale relating to any decisions and actions taken will be recorded in the Low Level Notification Form

Self Referral

Self Referral is a reporting system for low-level concerns for use by all staff and will become an integral part of the school's safeguarding provision. The aims are as follows:

- To ensure there is a formalised mechanism for reporting low-level concerns;
- To identify patterns of behaviour that are concerning;
- To allow staff to self-report to the school to protect themselves in situations where they may have found themselves compromised;
- To ensure the school continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Staff can self report directly to the Deputy Head, or the Head. Any self referrals or Low Level concerns will only be visible by the DSLs, Fiona Goulden and Simon Gould.

Should your concern involve Fiona Goulden, please report your concern directly to the LADO.

Should your concern involve Simon Gould, please report your concern verbally to the DSL and Fiona Goulden in the first instance.

Any member of staff who wishes to discuss the details of the system may speak with either of the DSLs in the first instance or the Principal who has responsibility for all safeguarding matters on behalf of the Board of Directors.

Context

During any period of remote education, staff, pupils and parents are encouraged to report any concerns related to online behaviour by emailing the Head of Section or Head in the first instance. This is in recognition of the increased time pupils would spend online and the possibility this might precipitate a greater number of behavioural concerns revolving around access to the internet. It is important that there is a quick and efficient way of alerting the safeguarding team of such matters.

This protocol will remain in place for any pastoral concerns which parents wish to inform the school about. Concerns will continue to be assessed by the safeguarding team and acted upon as necessary with the support of the relevant pastoral staff.

For staff, the process is to report incidents directly to the Head or DSL when they may have inadvertently ended up in a one-to-one meeting with a pupil online, emailed a pupil to their private email address or were concerned about the behaviour or appearance of a pupil during a lesson. This system is particularly effective in ensuring staff are able to self-report when their behaviour could potentially be misconstrued, misinterpreted or leave them vulnerable.

In light of paragraph 408 of KCSIE 2021, the recommendations in response to recent serious case reviews (most notably the Davies Review), and research conducted by the Safeguarding Unit at Farrer and Co, the school recognises the importance of developing its own robust mechanism for staff to report low-level concerns within an educational context and where adults are working with young people.

Self-reporting

As such, we have created a **self-referral process** through which staff can alert the **DSL (and Head)** to any occasion where they feel their behaviour or actions may be misconstrued or misinterpreted. When thinking about whether it is appropriate to use self referral or low level concerns, it is helpful to consider whether it would be prudent to notify the DSL at an early stage while the facts are clear in the mind rather than being required to recall the incident at a later date, should it be required. In the vast majority of cases there is a perfectly innocent or logical reason for the behaviour and staff should not feel that by self-reporting they will suffer any detriment or stigma. Reporting of such concerns is a neutral act, designed to protect the member of staff and pupil through transparency. Such reporting also helps the school to evolve its practice and ensure appropriate training and protocols are in place for the benefit of all staff and their safety. The DSL will, on receipt of a notification, decide how best to approach the issue and whether any further action is required. In all instances, the member of staff will receive a response via email or have the opportunity to meet with the DSL.

Concerns regarding the behaviour of another adult towards a child (Low Level Concerns)

Equally, staff may use the same process to report any behaviour by an adult towards a pupil or another child that may have concerned them. It is important that any concerns or incidents which might give rise to concerns about the conduct of a member of staff are reported to the DSL, not just where it is clear that a role or professional boundary has been broken. Again, such reporting is to protect both pupils and staff and allows for a simple record to be kept in case events are later referred to or any patterns emerge. Staff are not passing judgment on the behaviour but simply presenting it.

It is accepted that there are occasions when school staff, as professionals, have to make decisions and act in a particular way in order to protect the health, safety and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position or cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation in future. In this scenario, staff must make a self referral.

The process of reporting

Self referrals or Low Level Concerns should be made in person to the DSL.

A staff member who makes a low level concern, or a more serious allegation, in good faith will be supported through the process, and will benefit from the protection set out in the Whistleblowing Policy.

When to use low level concerns

Circumstances in which a member of staff should make a self referral or low level concern are as follows:

- Any incident where s/he feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation;
- Any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- Any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (school medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons etc.;
- Any incident where a member of staff engages in a one-to-one meeting with a pupil online that has not been arranged following the accepted protocols.
- Any incident where a member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- Any social contact with pupils outside of school (other than planned / authorised events, educational trips, or trivial incidents such as passing a pupil in the street or the supermarket or noticing that they are sitting, separately in the same restaurant, cinema, etc.) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- If a pupil becomes aware of / or uses a staff member's home address, mobile or home phone, or non-school email address other than in accordance with agreed protocols;
- The fact of, and explanation for, any one-to-one contact with a pupil on school trips, particularly if this takes place in a bedroom or other private space;
- Any incident where, for whatever reason, a member of staff has not complied with the Code of Conduct;

This is not intended to be an exhaustive list and there will be other circumstances where using the low level concern system will be appropriate. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved.

Staff who are unsure of whether to complete a low level concern are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made – nothing is lost by acting in this way.

Storage and action

Low Level concerns (and self referrals) can be accessed only by the **Head, DSL and Principal**. A member of staff will always be made aware of any notification that relates to them.

Date of policy: October 2021

Date of last review: September 2026
Date of next review: July 2027

Appendix Q - Human Rights and Equality

The Board of Directors is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty, and our local multi-agency safeguarding arrangements.

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk),

For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).