



## ALPHA PREPARATORY SCHOOL SAFEGUARDING and CHILD PROTECTION POLICY

**Publication Date: September 2022 to be reviewed in September 2023 (or before if statutory guidelines change).**

**Contact details for key individuals and authorities mentioned in this policy can be found in Appendix 5.**

This is a whole school policy, including EYFS, and is available on the school's website or from the school office on parental request. This policy takes into account current statutory and other national guidance, including:

- Education Act 2002 section 175/157
- The Education (Independent School Standards) Regulations 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022
- What to do if you are worried that a child is being abused 2015
- The Serious Crime Act 2015
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)

The Staff Code of Conduct and Whistleblowing Procedures are detailed within this policy. Other relevant policies in the school's safeguarding portfolio are the school's: E-Safety Policy, Safer Recruitment Policy, Allegations of Abuse Against Staff Policy, Health & Safety Policy, First Aid and Healthcare Policy, Fire Policy, Anti-Bullying Policy, Behaviour and Discipline Policy, Complaints Procedure, PSHEE Policy, British Values Policy and Lockdown Procedure.

### ***Statement of Intent***

At Alpha Preparatory School we are committed to safeguarding children and we expect everyone who works in our school to share this commitment.

Safeguarding is everyone's responsibility and this policy is addressed to all persons working for or on behalf of the school, temporary or permanent, in either a paid or voluntary capacity. Adults in our school take all welfare concerns seriously and we encourage pupils to talk to us about anything that worries them. We recognise that safeguarding issues can occur in all sections of society and will never adopt the attitude that 'it could not happen here'. All adults are expected to:

- contribute towards the maintenance of a safe, caring and secure environment
- promote a culture of listening to children
- be alert and vigilant to the signs of abuse
- understand the procedures for reporting their concerns

The school will work in partnership with other agencies to safeguard children and to prevent concerns from escalating. The school values its partnership with parents but in cases of suspected child abuse we will always act in the best interest of the child. This may mean that parents are not consulted before seeking advice from children's social care.

The procedures contained in this policy are consistent with those of the Harrow Safeguarding Children Board (HSCB). The HSCB is a multi-agency body set up to ensure agencies work in partnership to keep children and young people safe in Harrow and is a key statutory requirement established through the Children Act 2004. A new Harrow Strategic Safeguarding Partnership (HSSP) has been set up to identify and support through agreed resourcing, the priorities for both Harrow Safeguarding Children Board (HSCB) and Harrow Safeguarding Adults Board (HSAB). Full details of the HSCB local procedures are available on its website [www.harrowlscb.co.uk](http://www.harrowlscb.co.uk).

### ***Policy Principles***

- Welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any concern or disclosure that may suggest that a child is at risk of harm.
- Pupils and staff involved in child protection issues will receive appropriate support.
- Safer children make more successful learners
- This policy will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review.

### ***Policy Aims***

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection and the promotion of the welfare of its pupils

### ***Designated Safeguarding Lead (DSL)***

The DSL takes lead responsibility for safeguarding and child protection (including online safety) in the whole school, to include the EYFS. The DSL will be a member of the Senior Leadership Team to ensure that they have the status and authority within the school to carry out the duties of the post. At Alpha Preparatory School, Mr Pádraic Fahy, the Headmaster, is the DSL. The duties of the post include:

- Ensuring the child protection policies are known, understood and used appropriately by staff, reviewed at least annually and are publicly available
- Advising and supporting staff on child protection and safeguarding matters
- Encouraging a culture of listening to children
- Managing referrals to children's social care, the police or other agencies

- Taking part in strategy discussions and inter-agency meetings
- Liaising with the 'case manager' and the local authority designated officer (LADO) where allegations are made against staff
- Making staff aware of HSCB training and the latest safeguarding and child protection updates
- Transferring the child protection file to a child's new school
- Undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training and the risks associated with online safety
- Being the school's CEOP (Child Exploitation and Online Protection Officer) This is in liaison with the school's IT and E-safety coordinator.

(see Appendix 1 for further detail about the role of the DSL)

There are two Deputy Designated Safeguarding Leads at Alpha, one of whom is also a member of the Senior Leadership Team. At Alpha Preparatory School, the Deputy Head, Miss Jennifer Trott is the Deputy DSL on the SLT. Miss Debbie Tipton, a teacher at Alpha and our School Mentor is also a Deputy DSL. The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the Deputy DSLs will assume all of the functions above.

The school also has a nominated Safeguarding Governor, who works with the school to exercise Board level oversight of Safeguarding. The Safeguarding Governor is Mr Keval Shah.

The DSL, Deputy DSLs and Safeguarding Governor may be contacted through the school office – 0201 8427 1471 [sec@alpha.harrow.sch.uk](mailto:sec@alpha.harrow.sch.uk)

### ***Terminology***

*Safeguarding* and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

*Child Protection* refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

*Child* refers to everyone under the age of 18.

### ***Good Practice Guidelines and Staff Code of Conduct***

All staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. All staff should adhere to the school's Code of Conduct for Staff (see Appendix 4). Good practice includes:

- listening to children and treating them with respect
- setting a good example and conducting ourselves appropriately
- encouraging positive, respectful and safe behaviour amongst pupils
- involving pupils, as far as possible, in decisions that affect them

- whenever possible, asking the pupil's permission before initiating physical contact such as assisting with dressing, physical support during PE or administering first aid. Keep all physical contact to the minimum required.
- being aware that actions can be misinterpreted and try, as far as possible, to teach in a group setting. Where this is not possible, inform another member of staff of the intended activity, which should be carried out with easy access to nearby staff
- be aware of spatial arrangements and avoid working in enclosed spaces with a pupil.
- take care when dealing with injuries or physical issues, such as toilet mishaps. Unless it is an emergency, do not remove a pupil's clothing without another adult present.
- make sure that the glazed inserts on doors are left uncovered and that views into the room are left unobstructed
- follow the school's E-Safety policy and acceptable use of ICT, particularly in regard to online contact and electronic communication with pupils and the use of imaging devices, such as cameras and mobile phones
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy and other related safeguarding guidance
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- be alert to changes in pupil's behaviour and to signs of abuse, neglect and exploitation and refer all concerns about a pupil's safety and welfare to the DSL, or if necessary, directly to the police or children's social care

### ***Children Who May Be Particularly Vulnerable***

Some children may have an increased risk of abuse or require early support to prevent issues from escalating. Many factors can contribute to an increased risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. Although any child may benefit from early help, staff should be particularly alert to the needs of a child who:

- is disabled or has special educational needs (whether or not they have a statutory education, health and care plan)
- is living in a chaotic or unsupportive home situation
- is in family circumstances presenting challenges such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is involved in the taking of drugs or alcohol themselves
- is an asylum seeker
- is vulnerable to being bullied or engaging in bullying
- is living away from home or in temporary accommodation
- is living a transient lifestyle
- is frequently missing/goes missing from care or home
- has returned home to their family from care
- is vulnerable to discrimination e.g. on the grounds of race, religion or sexuality

- does not have English as a first language
- is at risk of female genital mutilation
- is a young carer
- is at risk of sexual exploitation
- is at risk of forced marriage
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is at risk of being radicalised or exploited
- is showing early signs of abuse/neglect
- is a privately fostered child

This list provides examples of additionally vulnerable groups and is not exhaustive. To ensure that all of our pupils receive equal protection, we will give special consideration to these children.

## **Mental Health**

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

Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, Alpha staff are well-placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or potentially be at risk of developing one. Our school seeks to promote positive mental health in our pupils and identify and address those with less severe problems at an early stage to build their resilience. We are also committed to identifying and supporting pupils with more severe needs, helping to make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS), where necessary.

All staff should be aware that negative changes in a child's mental health and behaviour can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following our child protection policy and speaking to the Designated Safeguarding Lead (Mr Fahy, Headmaster) or the Deputy Designated Safeguarding Lead (Miss Trott, Deputy Head).

**Parental Mental Health:** We recognise that some parents, who struggle with their own mental health, may experience difficulties at times with their parental responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children.

## ***Child Protection Procedures***

The aim of this section is to help staff understand what child abuse is, how to recognise it and what to do if you have any concerns.

### ***Recognising Abuse***

Abuse is a form of maltreatment. Somebody may abuse a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Children may be abused in a family, institutional or community setting, by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate online abuse. Abuse may be committed by adult men or women or by other children.

Keeping Children Safe in Education 2019 refers to four categories of abuse (physical, emotional, sexual, neglect) and a child may show signs or symptoms from one or more of these categories:

### ***Physical Abuse***

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

### ***Emotional Abuse***

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may include not giving the child opportunities to express their views, ignoring them or 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. It can also include overprotection and limitation of exploration and learning, or preventing a child participating in normal social interaction. Emotional abuse may also involve seeing or hearing the ill-treatment of another, for example domestic violence. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of mistreatment of a child, though it may also occur alone.

### ***Sexual Abuse***

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

children.

## **Neglect**

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

### ***Common Indicators of Abuse***

These include unexplained bruising or injuries; sexually explicit language or actions; sudden changes in behaviour; physical changes observed over a period of time (such as weight loss or increasingly unkempt appearance).

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs can be difficult as children may go to great lengths to hide their injuries, often because they are ashamed or embarrassed, or their abuser has threatened them not to 'tell'. It can also be difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change of behavior – from quiet to aggressive, or

- extrovert to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each piece of information will help the DSL to decide how to proceed. It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

### **Supporting the Victim of Abuse**

Staff members should be able to reassure victims of abuse that what they say will be, and is, taken seriously and that they will be supported. Children and young people should never be made to feel ashamed for speaking out, or that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Victims may not disclose the whole picture immediately. They should be asked if they would find it helpful to have a designated trusted adult to talk to about their needs and have choice about who this is. In response to any stress a child may experience, flexible or alternative arrangements for their education may need to be considered. We will do everything we reasonably can to protect the victim from bullying and harassment to ensure that they continue to receive a suitable education.

Further information about indicators that may suggest abuse can be found in Appendix 2 (taken from HSCB – *A guide to safeguarding children – what to do if you're worried about a child in Harrow*).

### **Concerns About a Pupil's Welfare**

If you have a concern about a pupil's welfare, you should speak to the DSL, without delay. Options will then include:

- managing any support for the child internally
- an early help assessment
- a referral for statutory services, for example if the child may be a 'child in need' or suffering or likely to suffer harm

Concerns will be recorded on a Child Protection Record of Concern or Disclosure form, which are available in the staff room.

If, in exceptional circumstances, the DSL (or one of the Deputy DSLs) is not available, this should not delay appropriate action being taken. The staff member should consider speaking to a member of the Senior Leadership Team or Welfare Committee and/or take advice from children's social care. In these circumstances, any actions taken should be shared with the DSL (or one of the Deputy DSLs) as soon as possible.

All staff should be aware that children may not feel ready, or may not know, how to tell

someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or may feel they are being threatened. This could be due to a child's vulnerability, disability and/or sexual orientation or potential language barriers. Any potential 'barriers' should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (DSL) or one of the Deputy Designated Safeguarding Leads (DDSLs) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate good communication.

If a child discloses to you that they are being harmed, you must follow the advice in the next section 'If a pupil discloses to you'.

### ***If a Pupil Discloses to You***

As outlined previously, it is important that all staff be aware that children may not feel ready, or may not know, how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, have been threatened, may have lost trust in adults or believe that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL.** The point at which you tell the pupil is a matter of professional judgement.

During your conversation with the pupil:

- Allow them to speak freely.
- Remain calm and do not over react – the pupil may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened'; 'You are doing the right thing in telling me'.
- Do not be afraid of silences – remember how hard this must be for the pupil.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this, etc.
- At an appropriate time, tell the pupil that in order to help them, you must pass the information on and explain to whom and why.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Remain non-judgmental. Do not admonish the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the pupil what will happen next.

- Report verbally to the DSL as soon as possible.
- Write up your conversation as soon as possible on the Child Protection Record of Concern or Disclosure form and hand it to the DSL
- Seek support if you feel distressed.
- **Remember that in an emergency, staff can make a referral directly to children’s social care, the police or the NSPCC themselves if they feel it is necessary to safeguard a child from significant harm.**

### ***Confidentiality and Sharing Information***

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL (or one of the Deputy DSLs), Headmaster or Chair of Governors (depending on who is the subject of the concern). That person will decide who needs that information and will disseminate it on a need-to-know basis. However, following a number of cases where senior leaders have failed to act upon concerns raised by staff, the statutory guidance *Keeping Children Safe in Education 2021* emphasises that **any** member of staff can contact children’s social care directly if they believe that this is necessary to safeguard the child.

**If the disclosure involves another member of staff, then the procedures outlined in the next section ‘Allegations of abuse against staff’ should be followed. Appendix 3 contains Alpha’s Whistleblowing Policy.**

Child protection information will be stored and handled in line with the GDPR and Data Protection Act 2018 principles. Information sharing is guided by the following principles. The information is:

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Child protection information will be stored separately from the pupil’s school file and the school file will be tagged to indicate that separate information is held.

The DSL will normally obtain consent from the parent (and/or pupil if appropriate) to share sensitive information with outside agencies. Where there is good reason to do so, the DSL may share information without consent and will record the reason for doing so. The GDPR and the Data Protection Act 2018 do not prevent schools from sharing information with relevant agencies, where that information may help to protect a child. Requests from parents to see child protection records will be referred to the Data Protection Officer. The school’s Data Protection Policy is available on request.

### ***Allegations of Abuse Against Staff***

If an allegation of abuse is made against a member of staff, set procedures must be followed. These must be used in all cases where it is alleged that a member of staff (including volunteers) 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 he or she may pose a risk of harm to children

Allegations against staff should be reported to the Headmaster. Allegations against the Headmaster should be reported to the Chair of Governors. The Headmaster or Chair of Governors will inform the Local Authority Designated Officer (LADO) without delay of any allegations that appear to meet the above criteria. The LADO will provide advice and co-ordinate any actions necessary to help bring cases to a swift and just conclusion.

Allegations concerning staff who no longer work at the school or historical allegations will be reported to the police.

The full procedures for dealing with allegations of abuse against staff can be found in *Keeping Children Safe in Education 2019* and in the school's Allegation of Abuse against Staff policy.

### ***Summary of Action to be Taken where there are Concerns about a Child***

It is important to distinguish between a child in immediate danger and/or at risk of harm and a child who may be in need of support to help them thrive and prevent concerns from escalating. However, **all** concerns about a pupil's welfare should be discussed with the DSL, without delay, as outlined in the earlier section *Concerns about a pupil's welfare*.

In the case where a child is at risk or in immediate danger, our child protection procedures will be followed and a child protection referral will be made to children's social care and/or the police immediately. Remember that, if necessary to protect the child, anyone can make a call to children's social care.

In the case where a child is not at risk or in immediate danger, but staff have concerns that a child's needs may not be met without intervention, they should discuss this with the DSL to decide what actions to take. Options include in-school support and/or referrals to specialist or early help services in accordance with the referral thresholds set by the Harrow Safeguarding Children Board. Guidance can be found on the HSCB website ([www.harrowscb.co.uk/guidance-for-practitioners/thresholds/thresholds-chart-and-guidance/](http://www.harrowscb.co.uk/guidance-for-practitioners/thresholds/thresholds-chart-and-guidance/)).

Referrals are normally made by the DSL, but where this is made by another member of staff, they should keep the DSL informed. Concerns should be monitored and the member of staff making the referral should press for reconsideration if the child's situation does not appear to be improving. All staff have a role to play in identifying emerging problems and working with other professionals in the provision of support and early help services. The weekly staff briefing is used as an opportunity for staff to share information about any children who need monitoring in this way.

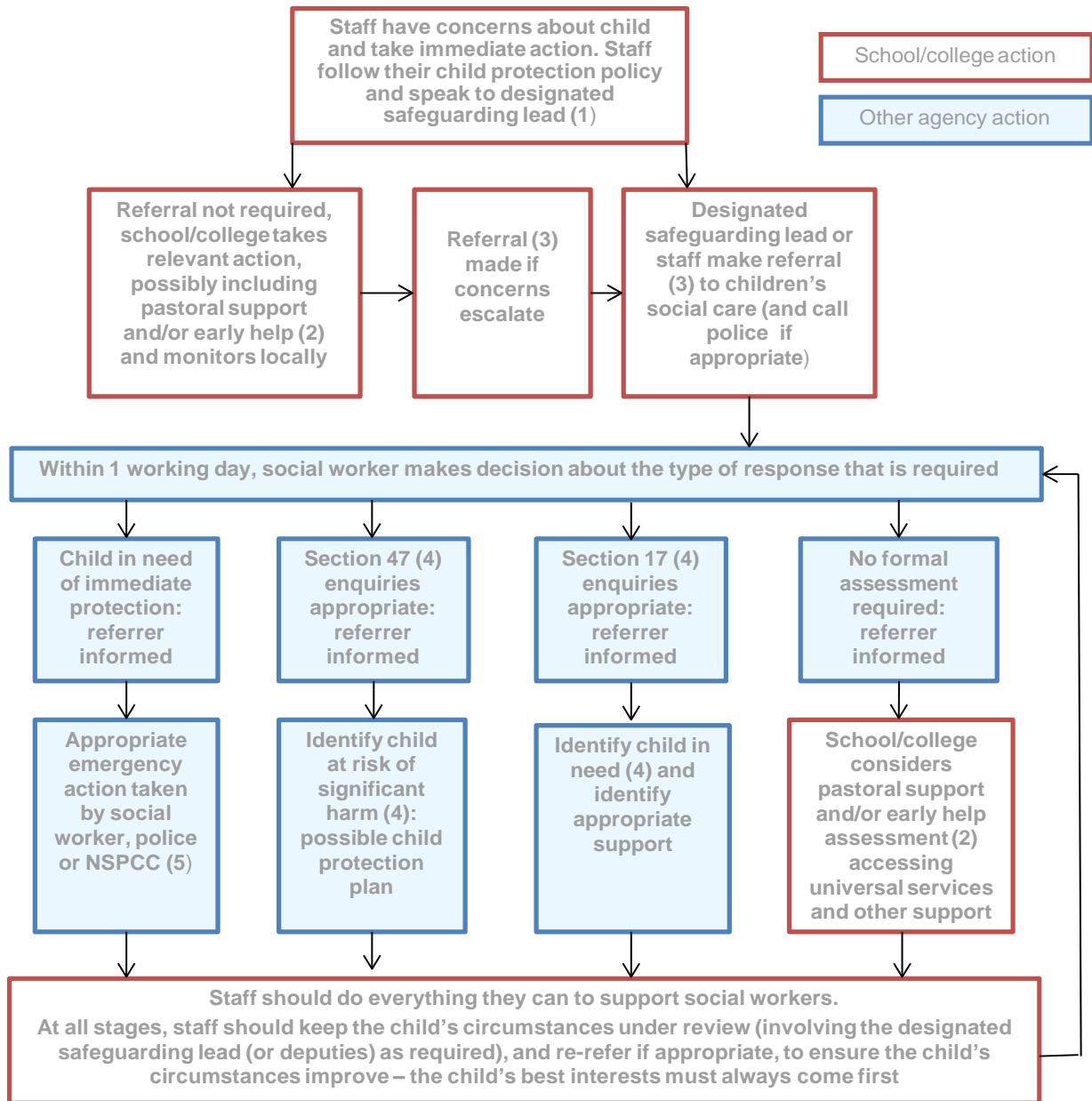
### ***Record Keeping***

In addition to sharing as much information as possible to professional bodies when required, Child Protection records should 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.

A flowchart summarising the action to be taken when there are concerns about a child can be found on the next page.

## Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of the guidance 'Keeping Children Safe in Education'.

(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 coordinated 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).

## ***Helping Children to Keep Themselves Safe***

We recognise that the teaching and pastoral support offered to pupils play an important role in helping children to stay safe. High self-esteem, confidence, supportive friends and good lines of communication with trusted adults are key aspects of supporting children's welfare. The school will therefore seek to:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to
- Ensure that children know that, although they can speak to any member of staff, there are 'special' adults in the school who they can approach if they are worried or in difficulty. At Alpha, the staff acting as these mentors are *Mrs. Lehane, Mrs. Tipton, Mr. Gonsalves*. There are also confidential worry/suggestion boxes in classrooms. In addition, Miss Trott, our Deputy Head and Deputy Designated Safeguarding Lead, is also available
- Include in the curriculum, activities and opportunities for PSHEE which equip children with the skills they need to stay safe and know how to seek help. Children are also reminded regularly about e-safety, which is integrated into the curriculum, and how to tackle bullying, including cyberbullying
- Understand that children with special educational needs and disabilities may face additional safeguarding challenges.

## ***Peer on Peer Abuse***

Children may be harmed by other children or young people, and such abuse may occur online and offline. We are aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there may be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. An example includes sexually harmful behaviour. Children who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. The support required for the pupil who has been harmed will depend on their circumstances and the nature of the abuse. We will also, in addition to addressing sanctions for the perpetrator, consider what support may be necessary for them to change their behaviour.

The school has a zero-tolerance approach to any form of abuse and will always address incidents of abuse seriously, involving partner agencies where required. Staff also understand that if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not reported.

Staff should not dismiss abusive behaviour as 'normal' between young people. Staff should not develop high thresholds before taking action, and abusive behaviour should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys', as it can lead to a culture of unacceptable behaviours and an unsafe environment for children. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence and rituals.

Peer on peer abuse can take many forms, including:

- Physical abuse such as biting, hitting, kicking or hair pulling
- Sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault
- Sexting, including pressurising another person to send sexual imagery or video content

- Initiation/hazing – used to induct newcomers into an organisation such as a sport team or school group by subjecting them to a series of potentially humiliating, embarrassing or abusive trials which promote a bond between them
- Prejudiced behaviour – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudice around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity
- Upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos, engaging in sexual activity without consent

As stated above, abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. Downplaying certain behaviours can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalizes abuse. In a co-educational school, such as Alpha, we recognise the potential gendered nature of peer on peer abuse. All staff members should challenge inappropriate behaviour and inappropriate language between children and young people. Different gender issues can be prevalent when dealing with peer on peer abuse; for example, girls being sexually touched or boys being subject to initiation type violence. At Alpha, we take the following steps to help prevent the risk of peer on peer abuse:

- An open and honest environment where pupils feel safe to share information about anything that is upsetting or worrying them
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying
- PSHEE, E-Safety, R.S and other curricular programmes
- Ensuring adequate supervision, especially in areas where children might be vulnerable
- Staff following the school’s Code of Conduct

All allegations of peer on peer abuse should be passed to the DSL without delay. They will be investigated and dealt with as follows:

- Information gathering – children, staff and witnesses will be spoken with as soon as possible to gather relevant information to understand the situation and to assess whether there was intent to cause harm.
- Decide on action – if it is believed that any person is at risk of significant harm, a referral will be made to children’s social care to decide on next steps, which may include contacting the police.
- Inform parents – as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is on the safety and well-being of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or police before parents are contacted.

Staff should understand that even if there are no reports of peer on peer abuse at Alpha, this does not mean it is not happening. If staff have any concerns about peer on peer abuse, they should speak to the Designated Safeguarding Lead (Mr Fahy, Headmaster) or the Deputy Designated Safeguarding Lead (Miss Trott, Deputy Head).

Where allegations of sexual violence or harassment are made, the school will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education 2022*.

## **Serious Violence**

All staff should be aware of the indicators, which may signal that our children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Risk factors that might increase the likelihood of involvement in serious violence are:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

All staff should be aware of the associated risks of serious violence and understand the measures to manage these risks. Advice for schools and colleges is provided in the Home Office's *Preventing Youth Violence and Gang Involvement* and the Home Office's *Criminal Exploitation of Children and Vulnerable Adults: County Lines guidance* which can be found readily online.

## **Specific Safeguarding Issues**

In this section you will find information on some specific safeguarding issues. Expert and professional organisations are best placed to provide up-to-date guidance on specific safeguarding issues. For example, information for schools and colleges can be found on the TES website and the NSPCC website. Schools and colleges can also access government guidance on the issues below via the GOV.UK website:

- Child Sexual Exploitation
- Children Missing Education
- Child Missing from Home or Care
- Bullying, including Cyberbullying
- Domestic Violence
- Drugs
- Fabricated or Induced Illness
- Faith Abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Gender-based Violence, Violence Against Women and Girls (VAWG)
- Hate Crimes
- Missing Children and Adults Strategy
- Private Fostering Concerns
- Preventing radicalisation
- Relationship Abuse
- Sexting
- Trafficking
- Upskirting
- Serious Violence

Annex A of Keeping Children Safe in Education 2021 contains important additional information

about specific forms of abuse and safeguarding issues. School leaders and staff that work directly with children should read the annex.

### ***Children Missing Education***

Attendance is closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation, or mental health problems, criminal exploitation, travelling to conflict zones, female genital mutilation or forced marriage. The DSL will monitor absences and take appropriate action, including notifying the Local Authority under the Children Missing Education criteria.

Staff must be alert to signs of children at risk of travelling to conflict zones or for purposes of female genital mutilation or forced marriage and must alert the DSL of any concerns without delay.

### ***Sexting***

'Sexting' refers to the production and/or sharing of sexual photos and videos of and by young people under the age of 18. It includes nude or semi-nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

'Sexting' does not include the production and sharing of sexual photos and videos of under 18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

We will deal with incidents of sexting in accordance with the guidance from the UK Council for Child Internet Safety (UKCCIS), '*Sexting in Schools and Colleges: Responding to incidents and safeguarding young people*'. All incidents will be responded to as follows:

- The incident will be referred to the DSL without delay and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the pupils involved.
- Parents will be involved at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police and they will then investigate. This may include seizure of devices and interviews with the young people involved.

### ***Sexual Exploitation of Children***

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. This is abuse, even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Perhaps no issue is more pressing for contemporary child protection than the role of the internet in facilitating child sexual abuse. Developments in technology have created new opportunities for offending against children. Some reflect patterns of offending which have existed for years: for example, the creation, possession and distribution of indecent images of children or

the grooming of children for the purpose of abuse at a later time. Other opportunities to offend are new, including the use of online streaming as a means of abusing children who may be in the UK or abroad.

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

- Can affect any young person, male or female, under the age of 18
- Can include both contact and non-contact activity
- Can take place in person or via technology or a combination of both
- Can involve force or enticement based methods of compliance and may or may not be accompanied by violence or threats of violence
- May occur without the young person's immediate knowledge e.g. through others copying videos and images and posted on social media
- Can be perpetrated by individuals or groups, males and females, children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse
- Is typified by some sort of power balance in favour of the perpetrator

Some of the following signs may be indicators of child sexual exploitation:

- Appearing with unexplained gifts or new possessions
- having older 'boyfriends' or 'girlfriends'
- Children who suffer from sexual infection
- Children who regularly miss school or return home late
- Associating with other young people involved in exploitation
- Mood swings or changes in emotional wellbeing
- Drug or alcohol use
- Displaying inappropriate sexualised behaviour

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

This section includes information from the Harrow Safeguarding Children Board (HSCB) and further information can be found on their website.

FGM, also known as female circumcision or female genital cutting, is defined by the World Health Organisation (WHO) as the range of procedures which involve "the partial or complete removal of the external female genitalia or another injury to female genital organs whether from cultural or any other non-therapeutic reason". It is a deeply rooted tradition widely practiced among specific populations in Africa and parts of Asia, which served as a complex form of social control of women's sexual and reproductive rights. Procedures are mostly carried out on young girls sometime between infancy and age 15, and occasionally on adult women. The practice is illegal in the UK under the Female Genital Mutilation Act 2003.

Short term health problems include severe pain, difficulty passing urine, bleeding, infection and death. For some types of FGM long-term problems include difficulty passing urine and long painful periods. For some types there may be a long scar, which can make sex and childbirth difficult. Recurrent infections can lead to infertility.

Women may also feel angry, depressed and suffer from post-traumatic stress disorder.

FGM is a complex issue – despite the harm it causes, many women and men from practicing communities consider it to be normal to protect their cultural identity.

Indicators that may point to a risk of FGM:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM
- Child talks about going abroad to be 'cut'

Signs that a child may have undergone GM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

**The Serious Crime Act 2015 set a mandatory duty on professionals, including teachers to personally report to police when they discover that FGM appears to have been carried out on a girl under 18.** In schools, this will usually come from a disclosure.

In addition to having regard for the mandatory reporting duty outlined above, if you have concerns that a girl is at risk of FGM or is a victim of FGM, you must bring these concerns to the DSL without delay. While all staff should speak to the designated safeguarding lead (or deputy) with any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

If you feel it needs an immediate response, contact the NSPCC FGM Helpline on 0800 028 3550 or [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk). If a girl is in immediate danger, contact the Police.

### ***Forced Marriage***

We all have the right to choose who you marry, when you marry or if you marry at all.

Forced marriage is when you face physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (eg if you're made to feel like you're bringing shame on your family).

Forced marriage is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)

- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Should a member of the school community need to report a concern about forced marriage they can contact the DSL of Alpha or, in his absence, one of the Deputy DSLs. A concern can also be raised with the Forced Marriage Unit (FMU) on the details below and a trained professional will give you free advice on what to do next:

**Forced Marriage Unit**

[fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

Telephone: 020 7008 0151

From overseas: +44 (0)20 7008 0151

Monday to Friday, 9am to 5pm

Out of hours: 020 7008 1500 (ask for the Global Response Centre)

If someone you know is at risk Contact the FMU if you know someone who's been taken abroad to be forced into marriage.

Give as many details as you can, for example:

- where the person has gone
- when they were due back
- when you last heard from them

The FMU will contact the relevant embassy.

If they're a British national, the embassy will try to contact the person and help them get back to the UK if that's what they want.

Always call 999 in an emergency.

***Honour-Based Violence***

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBV, they must contact the DSL as a matter of urgency.

***Radicalisation and Extremism***

The government 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.

Some children are at risk of being radicalised. Staff receive training to raise their awareness of the 'Prevent Duty' placed upon schools to prevent children and young people from being drawn into terrorism and to identify signs of extremism. As part of wider safeguarding responsibilities staff should be alert to the following behaviours associated with radicalisation:

- Accessing violent, extremist websites, especially those with a social networking element

- Possessing or accessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation
- Being in contact with extremist recruiters
- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Parental reports of changes in behavior, friendship or actions and request for assistance
- Pupils voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, e.g. gender, disability, homophobia, race, culture, religion, colour
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Staff should also be alert to any concern about a pupil travelling to a conflict zone, such as Syria. Concerns about children who may be at risk of radicalisation should be treated as a safeguarding concern and reported to the DSL. The DSL may make a referral to the Channel Programme, in accordance with the procedures outlined on the Harrow Safeguarding Children website. Channel is a multi-agency partnership led by the local authority with the police and other services to protect and divert children and adults from being drawn in to committing terrorist-related activity. Channel addresses **all** forms of extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and this is reinforced through the ethos of the school. Secure ICT filtering and end-point monitoring are used to alert the school to potential risk behavior involving the internet. Any visiting speakers or workshop providers will be checked to ensure that they are suitable and supervised while they are in school, to ensure that no extremist views or material is transmitted. Staff will intervene if the speaker engages in any language or activity which staff deem to expose pupils to influences which might promote extremist ideas. Further information can be found in the school's British Values Policy and E-Safety Policy.

### ***Relationship Education***

The Department for Education has produced a one-stop hub for teachers which can be accessed here: [Teaching about relationships, sex and health - GOV.UK \(www.gov.uk\)](https://www.gov.uk/teaching-about-relationships) This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. Further guidance focused on teaching relationships education specifically to prevent sexual harassment and sexual violence will be published in the 22/23 academic year.

The following resources, plus many more listed in Annex B of Keeping Children Safe in Education (September 2022), may also help schools and colleges understand and teach about safeguarding:

DfE advice for schools: [Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/teaching-online-safety)

UK Council for Internet Safety (UKCIS) guidance: [Education for a Connected World - GOV.UK \(www.gov.uk\)](https://www.gov.uk/education-for-a-connected-world)

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/sharing-nudes-and-semi-nudes)

LGFL 'Undressed' at [Undressed \(lgfl.net\)](http://Undressed.lgfl.net) 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 UKCIS [Using External Visitors to Support Online Safety Education: Guidance for Educational Settings - GOV.UK \(www.gov.uk\)](http://www.gov.uk) 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: [CEOP Education \(thinkuknow.co.uk\)](http://thinkuknow.co.uk)

Public Health England: [Mental wellbeing | Overview | PHE School Zone](#)

[Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

### ***Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)***

Staff need to be aware of children being manipulated, coerced or deceived into taking part in sexual or criminal activity by an individual or group, taking advantage of a power imbalance. This abuse is known as child sexual exploitation (CSE) and child criminal exploitation (CCE). The imbalance in power may be down to age, but it could also be due to gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The abuse may be in exchange for something the victim wants or needs and/or will benefit the perpetrator/facilitator, either for financial advantage or in increased status.

CSE and CCE can be carried out by: individuals or groups; males or females; children or adults. It can be opportunistic or organised. It can happen once or occur a number of times. It may involve violence or threats of violence, force and/or enticement-based methods of compliance. Even if activity appears consensual, it can still be exploitation and can occur both physically and online.

### ***CSE and CCE – What Staff Should Look Out For***

The vulnerability of children involved in child criminal exploitation is not always recognised by adults and professionals and staff should be aware that indicators of exploitation are different for boys and girls. CSE is a type of sexual abuse. It can include physical contact, such as assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It can include non-contact activities, for example, the involvement of children in producing sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in a sexually inappropriate way, or grooming a child in preparation for abuse including via the internet.

CSE may be a one-off occurrence or it may happen over time. It may also happen without the child's immediate knowledge; for example, the sharing of videos or images of them on social media by others.

Children aged 16-17 years old, who can legally consent to have sex, can still be affected by CSE. They may be coerced into sexual activities and not realise they are being exploited; for example, they may believe they are in a genuine, romantic relationship.

Specific forms of child criminal exploitation (CCE) may include children being forced or manipulated to transport drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime and threatening/committing serious violence to others.

Perpetrators threatening victims (and their families) with violence or entrapment/coercion into debt can be used to trap children in this kind of exploitation. Children may also be coerced into carrying weapons, or may begin carrying a knife for protection from others.

Some children who commit crime as a result of child criminal exploitation (CCE), particularly older children, may not always be viewed as a victim by adults and professionals. It is worth remembering that they may have still been criminally exploited, even if the activity appears to be something they have agreed or consented to.

An important note is that girls who are criminally exploited may have a different experience to that of boys and may have different indicators too. Staff need to be aware that girls can be criminally exploited too; boys and girls being criminally exploited are also at a higher risk of being the victims of sexual exploitation.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse, exploitation can:

- affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- still be abuse even if the sexual activity appears consensual;
- include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- take place in person or via technology, or a combination of both;
- involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created, and posting them on social media);
- be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- be typified by some form of power imbalance in favour of those perpetrating the abuse.

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

Some of the following signs may be indicators of Child Criminal Exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

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

### ***Child Criminal Exploitation: County Lines***

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Unexplained or frequent absences may be an indicator that a child is being trafficked for the purpose of transporting drugs.

### ***Private Fostering Arrangements***

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age. Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases must be alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Further guidance is available from the HSCB website: [www.harrowlscb.co.uk/private-fostering/](http://www.harrowlscb.co.uk/private-fostering/)

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should raise this with the DSL and the school will notify the local authority of the circumstances.

### ***Domestic Abuse***

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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, including teenage relationship abuse. All of which can have a detrimental and long-term impact on their health, well-being, development, and overall ability to learn.

### ***Physical Intervention***

Staff must only use physical intervention as a last resort, when a child is endangering themselves or others. The minimal force necessary to avert the danger should be used and the member of staff involved should report any such incident to the Headmaster as soon as possible. All incidents of physical restraint should be recorded in writing and reported immediately to the Headmaster. Parents will be informed of any physical restraint used on their child on the same day or as soon as reasonably practicable.

## **Corporal Punishment**

Corporal punishment is never used, nor is its use ever threatened.

## **Training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

Training on safeguarding and the areas of keeping children safe in education is vital and taken seriously at the school. This is particularly important when new duties are introduced, as with the introduction of Prevent in July 2015, or the recognition of additional types of abuse, as in September 2016. Safeguarding updates are provided regularly during staff meetings or written in staff communication. At the start of each academic year, changes to KCSIE are discussed during staff INSET.

New staff and governors will receive a briefing during their induction, which includes the school's:

- Safeguarding and Child Protection Policy
- Code of Conduct
- E-safety Policy and acceptable use agreements
- Fire Policy
- Health and Safety Policy
- Safeguarding response to children who go missing from Education
- Behaviour and Discipline Policy
- Details of the DSL/Deputy DSL and their role
- Keeping Children Safe in Education 2019 and Annex A of the document.
- Information on Prevent and supporting those vulnerable to radicalisation.

They will also be provided with copies of the relevant policies and Part One of Keeping Children Safe in Education. In addition, the school leaders and all staff who work directly with children at the school must read Annex A of Keeping Children Safe in Education 2019.

Volunteers and contracted staff will be given the school's child protection information leaflet and an explanatory briefing.

Governing bodies and proprietors of schools should ensure that all Governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

At Alpha, all staff and Governors will receive training that is regularly updated, and will receive updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. These updates may be received via email, bulletins, website access and staff meetings.

The DSL, Deputy DSLs and members of the Welfare Committee attend formal level 3 training provided by the Local Authority at a minimum of two yearly intervals. In addition, their knowledge and skills are refreshed at regular intervals, including through attendance at termly DSL and Designated Teachers seminars arranged by the Harrow Safeguarding Children's Board.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their 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 Human Rights Act, 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 \(equalityhumanrights.com\)](https://www.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 (which encompass a person's 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 \(www.gov.uk\)](https://www.gov.uk/guidance/equality-act-2010-advice-for-schools) For further information, please go to [Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

### ***Public Sector Equality Duty***

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is set out in the advice linked in paragraph 90 of Keeping Children Safe in Education (September 2022).

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made, or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

### ***E-Safety***

We will provide training and information for our staff, parents and pupils in internet safety. We will regularly review and further develop the E-safety elements of our curriculum under the guidance of Mrs Tipton (E-safety coordinator) and Miss Lehane (PSHE coordinator).

All school computers are password protected, internet access is filtered and our system is protected by a firewall to prevent access to unsuitable sites and to protect against infiltration from external sources. We also have end-point monitoring by trained staff, provided through the Smoothwall E-Safe service to alert the school to any ICT behaviour which may indicate a safeguarding risk. All staff, volunteers, parents/pupils, (Reception – Year 6), sign the appropriate version of the school's 'Acceptable Use of the Internet and ICT' form. In addition, children are taught about safeguarding issues and staying safe online through their PSHE lessons, assemblies and computing lessons.

Personal cameras, camera phones or other media devices should not be used to take photographs or videos in school, on school outings and particularly in the EYFS setting. Only designated school cameras can be used and these are for school business only. Mobile Phones are not to be used when teaching or supervising children, except when needed for safeguarding purposes, e.g. on a school trip when no other option is available.

### **Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

**CONTENT:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**CONTACT:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

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

and

**COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group at (<https://apwg.org/>).

Governing bodies and proprietors should ensure online safety is a running and interrelated theme, whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

**PHONES IN THE EYFS SETTING:** All personal mobile phones and mobile devices should be stored securely out of reach within the EYFS setting. This includes staff, visitors, parents, volunteers and students. Mobile devices must not be used in any teaching area within the setting or within the bathroom area. School equipment should always be used to record moving images or photographs within the setting. All telephone contact with parents or outside agencies should be made on the school telephone.

Information and Communications Technology covers a wide range of resources including; web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. Currently the internet technologies children and young people are using both inside and outside of the classroom include:

- Websites
- Learning Platforms
- E-mail and Instant Messaging
- Chat Rooms and Social Networking
- Blogs and Wikis
- Podcasting
- Video Broadcasting
- Music Downloading

- Gaming
- Mobile/ Smart phones with text, video and/ or web functionality
- Other mobile devices with web functionality

Whilst exciting and beneficial both in and out of the context of education, much ICT, particularly web-based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these Internet technologies. We understand the responsibility to educate our pupils on eSafety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

Further guidance is detailed in our separate policy on E-Safety, which is available on the school website or from the school office upon parental request.

### ***Remote Education***

Guidance to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely can be found at [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and [Providing remote education: guidance for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

The NSPCC also provide helpful advice - [Undertaking remote teaching safely | NSPCC Learning](https://www.nspcc.org.uk)

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

### ***Children Who Are Lesbian, Gay, Bisexual or Trans (LGBT+)***

The fact that a child or a young person may be LGBT+ is not in itself an inherent risk factor for harm. However, children who are LGBT+ can be targeted by other children and adults.

In some cases, a child who is perceived by other children to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+.

Risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Staff should also be aware, be vigilant and discourage inappropriate language which demeans or is pejorative to LGBT+ children or adults, for example, the use of the word 'gay' to describe something other than a homosexual.

### ***Safer Recruitment***

The school complies with the requirements of *Keeping Children Safe in Education 2021 and the Education and training (Welfare of Children) Act 2021* in order to deter, identify and reject applicants who are unsuitable to work with children by ensuring that:

- carrying out the required pre-employment checks and verifying the applicant's identity, qualifications and work history
- at least one member of each recruitment panel has completed safer recruitment training
- all relevant staff (involved in early years settings and/or before after school care for children under eight) are made aware of the disqualification and disqualification regulations and their obligations to disclose relevant information to the school.
- obtaining written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the school have been appropriately checked and by checking that the identity of the individual matches the person for whom the checks have been carried out.
- ensuring that volunteers, including governors undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised. A DBS check for a volunteer is free.
- checking the identity of all contractors working on site and requiring DBS with barred list checks where required by statutory guidance. Contractors who have not undergone the appropriate checks will not be allowed to work unsupervised during days and times that pupils are present.
- If someone is not eligible for a children's barred list check but will be working in a management position, a section 128 check should be carried out using the Teaching Regulation Agency's (TRA) employer access service.

The school maintains a single central record of recruitment checks undertaken.

Full details can be found in the school's Safer Recruitment Policy (available on the school's website or from the school office upon parental request).

### ***Whistleblowing***

All concerns about safeguarding practices or the conduct of a colleague towards a pupil should be reported to the Headmaster. If the concerns are about the conduct of the Headmaster, then this should be reported to the Chair of the Governors. It can be difficult to discuss the conduct of colleagues, but the welfare of pupils must take priority. The school's Whistleblowing Code (see Appendix 3) enables all members of staff to raise concerns and for their concerns to be handled sensitively and fairly. No one who reports a genuine concern in good faith needs to fear retribution.

Staff may also report their concerns directly to children's social care or the police if they feel that direct reporting is necessary to secure action. The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns internally (Tel: 0800 028 0285 or email: [help@nspcc.org](mailto:help@nspcc.org)).

### ***Complaints***

Our complaints procedure (available on the school website or the school office on parental request) will be followed where there is a concern which does not initially reach the threshold of child protection action. Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedures.

### ***Site Security***

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms that they have permission to be on site. Parents who are simply delivering or collecting their children or attending parent consultation meetings do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. The Headmaster will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

The Buildings Committee comprising of Mr. Fahy (Headmaster), Miss Trott (Deputy Head) and Mr. McAllister (Maintenance Manager) regularly inspects the premises to identify issues of maintenance and security.

Capital projects are budgeted separately and are approved by the Board of Governors, following recommendation by the committee.

The school complies with legislation governing regular checks on fire alarm, gas boiler, electrical supply, portable electrical appliances, water supply, fire extinguishers and fire precautions.

The burglar alarm is also checked regularly and logs are kept. Termly fire drills are held and records are kept. Annual risk assessments are made of the building and are kept by the Maintenance Manager (Mr. McAllister).

The school gates are locked by 8.30am each morning and the only entry thereafter is through the front door, which is monitored constantly by a video camera.

### ***Vehicles and Outings***

All outings must be approved by the Headmaster, following a completed risk assessment. Parental consents are always obtained.

Only MIDAS-trained drivers can drive the school minibus if children are passengers. Staff who wish to drive the school car must provide the Headmaster with permission to carry out a check on their driving licence through the DVLA online checking service and must confirm that they have no medical condition which might affect their ability to drive. The school notifies our insurer accordingly and receives confirmation of eligibility to drive the vehicle under the terms of our policy.

### ***Medical***

The school Welfare Assistant (Mrs. Patel) co-ordinates the school's first-aid and support for pupil with medical conditions. Among her duties, Mrs. Patel carries out health screening checks on pupils in Nursery, Reception and Year 3 and organises the Autumn term immunisations across the school, seeking parental permission. She also gives Year 5 girls instruction on personal hygiene, monitors any pupils on health care plans, advises staff and liaises with parents and external agencies.

The school has several paediatric first-aiders (Mrs. P Ryan, Mrs. L. Richardson Mrs. R. McIntyre, Mrs. M. Lodhia, Mrs. A. Vallabh, Mr. K. Holland and Mrs. J. Patel). We also have several other qualified first aid staff. All staff at Alpha receive regular first aid training.

### ***Welfare Committee***

The school's Welfare Committee meets regularly and consists of Mr. Fahy (Headmaster/DSL), Miss Trott (Interim Deputy Head/ Deputy DSL), Mrs. Lehane (PSHEE and School Council Coordinator), Mrs. P Ryan (Head of Nursery) and Mrs. Tipton (E-safety Coordinator). The Welfare Committee considers safeguarding issues and initiatives to promote a safe and secure environment in which children feel listened to. All members of the Committee are trained to child protection level 3.

## **Appendices**

Appendix 1: Role of the DSL

Appendix 2: Recognising signs of child abuse

Appendix 3: Whistleblowing Code

Appendix 4: Code of Conduct for Staff

Appendix 5: Key contact information Appendix 6: Record of Concern Form

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

### ***Managing Referrals***

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care
- Refer cases to the Channel programme where there is a concern about radicalisation
- Refer cases to the police, where a crime may have been committed
- Refer to the local authority designated officer (LADO) for child protection concerns which involve a member of staff
- Refer cases to the Disclosure and Barring Service where a person is dismissed or has left due to risk/harm to a child
- Support staff who make referrals

### ***Work with Others***

- Liaise with the Headteacher/Chair of Governors to inform him/her of issues, especially ongoing enquiries and police investigations.
- Liaise with the LADO and appointed case manager for child protection concerns which involve a member of staff
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

### ***Training***

The designated safeguarding leads should receive appropriate training carried out at least every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- 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.
- Act as the *Prevent Duty* Lead person within the school. (Anti-extremism/ radicalisation)
- Understand the unique risks associated with online safety and also to understand the additional risks that children with SEND face online.
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff.

### ***Raising Awareness***

- The designated safeguarding lead should ensure the school policies are known and used appropriately
- Assist staff to understand and discharge their role and responsibilities and encourage a culture of listening to children and taking account of their feelings and wishes.
- Ensure the school's child safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies

regarding this.

- Ensure the child safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the Harrow Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Keep secure, written records of concerns and referrals.
- Where children leave the school, 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.
- The DSL is the school's CEOP (Child Exploitation and Online Protection Officer) This is in liaison with the school's IT and E-safety coordinator.

## **Appendix 2 Recognising Signs of Child Abuse and Neglect**

*(from the Harrow Safeguarding Children Board: A guide to safeguarding children- what to do if you're worried about a child in Harrow)*

Every child has the right to be kept safe from physical, emotional and sexual abuse and neglect. The following is not a comprehensive or definitive list, but gives an indication of situations which should alert you to possible causes for concern.

### ***Signs that may suggest neglect:***

- Squalid, unhygienic and/or dangerous home conditions
- Parents who fail to attend their children's health or developmental needs i.e. failure to seek medical advice for illness
- Children who appear persistently undersized or underweight, appearing hungry or asking for food
- Children who continually appear tired or lacking in energy
- Children that are dirty and/or appear unkempt
- Children who suffer frequent injuries due to lack of supervision
- Developmental delay

### ***Signs that may suggest emotional harm:***

The following signs may be present in children whose parents are over-critical and emotionally distant, or who are unable to meet their child's emotional needs:

- Children whose behaviour is excessive, i.e. excessive bed wetting, overeating, rocking, head banging
- Children who self-harm, i.e. may cut or scratch themselves or overdose
- Children who attempt suicide
- Children who show high levels of anxiety, unhappiness or withdrawal
- Children who usually seek out or avoid affection
- Very low self-esteem, often with an inability to accept praise or trust adults
- Excessively clinging and attention-seeking behaviour
- Over-anxious – either watchful, constantly checking or over-anxious to please
- Withdrawn and socially isolated

### ***Signs that may suggest physical abuse:***

- Multiple bruising to different parts of the body
- Bruising of different colours, indicating repeated injuries over time
- Fingertip bruising to the chest, back, arms or legs
- An injury for which there is no adequate explanation
- Bruises in places not normally harmed during play, i.e. back of the legs, abdomen, groin area
- Grasp marks on legs and arms (or chest of a small child)
- Finger marks i.e. you may see 3 – 4 small bruises on one side of the face and none on the other
- Symmetrical bruising, i.e. the same pattern of bruising on both sides of the body/head/legs/arms etc. especially on the ears or around the eyes

- Outline bruising, particularly on the buttocks or back
- Old and new bruising, particularly in the same area, e.g. buttocks
- Bites – these can leave clear impressions of teeth. Human bite marks are oval or crescent shaped. If the distance is more than 3cm across, it can indicate that they might have been caused by an adult or older child
- Fractures – these should be suspected if there is pain, swelling or discolouration over a bone or joint. As fractures also cause pain it is difficult for a parent or carer to be unaware that a child has been hurt as they will cry, be uncomfortable, unsettled and/or fractious.
- Burns/scalds – it can be very difficult to distinguish between accidental and non-accidental burns but as a general rule, burns or scalds with clear outlines are suspicious, as are burns of uniform depth over a larger area.

***Signs of possible sexual abuse:***

- Something a child has told you
- Something a child has told someone else
- A child who shows worrying sexualised behaviour in their play or with other children
- A child who seems to have inappropriate sexual knowledge for their age
- A child who may be visiting or being looked after by a known or suspected sexual offender
- Itching, redness, soreness or unexplained bleeding from vagina or anus



## Appendix 3 Whistleblowing Code

Whistleblowing is the disclosure of information that relates to wrongdoing or dangers at work.

This may include, but is not confined to:

- conduct giving rise to child protection concerns
- contravening health and safety guidelines
- bribery or financial fraud
- serious breaches of the school's code of conduct
- negligence
- criminal activity
- unauthorised disclosure of confidential information
- damage to environment or property
- public examination fraud
- failure to comply with legal or professional obligation or regulatory requirements

(Note: concerns which appear to meet the threshold for child protection will be managed through child protection and allegations management procedures from the outset.)

### ***Reasons for Blowing the Whistle***

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that pupils and other members of our community are safe and fairly treated and that the school maintains high professional standards. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects pupils, other staff members and the reputation of the school, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

### ***Confidentiality***

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The school would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The school will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing.

Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

### ***Reporting Procedure***

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was a member of the school. You may raise your concern verbally or in writing. You should report your concern directly to the Headmaster. If the Headmaster is the subject of your concern, speak to the Chair of Governors.



All staff are expected to set and maintain the highest professional standards, to work as part of a team and to promote the safety and welfare of our pupils and other members of the school community.

### **Principles**

School staff have an influential position in the school and will act as role models for pupils by consistently demonstrating high standards of behaviour.

We expect that all teachers will act in accordance with the personal and professional behaviours set out in the Teachers' Standards.

We expect all support staff, governors and volunteers to also act with personal and professional integrity, respecting the safety and well-being of others.

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the school and its pupils.

This Code of Conduct is in line with the statutory safeguarding guidance *Keeping Children Safe in Education 2021*, which requires schools to have a code of conduct which includes acceptable use of technologies, staff/pupil relationships and communications, including the use of social media.

### **General Obligations**

Staff set an example to pupils. They will:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language in school
- Treat pupils and others with dignity and respect
- Never use corporal punishment or humiliation as a form of punishment. Discipline should be fair, proportionate and in line with the school's Behaviour and Discipline Policy
- Encourage all pupils to reach their potential, making adjustment to meet individual needs as required
- Show tolerance and respect for the rights of others
- Never condone inappropriate behaviour by pupils or others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- Express personal beliefs in a way that will not overly influence pupils, and will not exploit pupil's vulnerability or might lead them to break the law
- Understand the statutory frameworks they must work within and be aware of the school's key policies, such as Safeguarding and Child Protection, E-safety Policy and Behaviour and Discipline Policy, which are available on the school website and from the school office
- Observe the school's no smoking, alcohol or recreational drugs policy
- Inform the Head of any medication that may affect their ability to safely discharge their duties, so that a risk assessment can be made which safeguards the pupils and the staff member.

- Ensure that all personal medication is kept securely locked away to prevent access by pupils
- Pay due regard to safe working practices, risk assessments and health & safety requirements
- Inform the Head without delay of any circumstances that may disqualify them from working with children or adversely affect the reputation of the school
- Demonstrate teamwork and support of colleagues in upholding the positive family ethos of the school

### ***Safeguarding***

Staff have a duty to safeguard pupils from harm and to report any concerns they have about a pupil's welfare.

Staff will familiarise themselves with the school's safeguarding & child protection policy and procedures and ensure that they are aware of the processes to follow if they have concerns about a pupil.

Our safeguarding & child protection policy and procedures are available on the school website or from the school office. New staff will be given copies on induction.

### ***Staff/pupil relationships***

Staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague or line manager knows this is taking place

Staff should avoid contact with pupils outside of school hours if possible.

Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.

While we are aware that many pupils and their parents may wish to give gifts to staff, for example at the end of the school year, gifts from staff to individual pupils are not acceptable. If a staff member wishes to provide token whole class gifts, such as sweets for Christmas, they should inform the Headmaster.

If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, this should be reported to the Headmaster or a member of the Senior Management Team.

### ***Communication and Social Media***

Staff's social media profiles should not be available to pupils. If they have a personal profile on social media sites, they should set their public profiles to private. Staff should consider using a first and middle name, rather than their full name to aid privacy from pupils who may search for them.

Staff should not attempt to contact pupils or their parents via social media, or any other means, in order to develop any sort of relationship outside of school. They will not make any efforts to find pupils' or parents' social media profiles.

Staff will ensure that they do not post any images or comments online about school business or that identify any pupils at the school. Nor should they post any images or comments that would breach the professional standards expected from a member of staff.

Staff should be aware of the school's e-safety policy.

### ***Acceptable Use of Technology***

Staff will not use technology in school to view material or carry out activities that are illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene or offensive emails, gambling and viewing pornography or other inappropriate content.

Staff will not use personal equipment, such as mobile phones or cameras, to take images or recordings of pupils.

Staff will not use mobile phones when supervising or teaching children, other than for safeguarding or an emergency situation e.g. on a school outing.

Personal and work business should be kept separate:

- Personal equipment, such as personal memory sticks or personal laptops, should not be used in school.
- School equipment, such as staff issued memory sticks and laptops, should be used for school business only.

Staff should check their school email regularly and use this account for school business only. Personal email accounts will not be used for school business.

Staff understand that their use of the school's network is monitored and the school reserves the right to examine or delete files that may be held on its computer network, laptops or other devices. Monitoring data is processed in accordance with the school's privacy notices.

Staff should not attempt to bypass the school's internet filtering system.

Any internet sites to be used in lessons should be thoroughly checked beforehand – remember to check for inappropriate adverts, comments and links to other sites.

Respect copyright of materials and acknowledge sources when used.

### ***Confidentiality***

In the course of their role, members of staff are often privy to sensitive and confidential information about the school, staff, pupils and their parents.

Staff will ensure that this information is:

- Never disclosed to anyone without the relevant authority
- Never used to humiliate, embarrass or blackmail others
- Never used for purposes other than what it was collected, and intended, for

Confidentiality does not overrule staff's duty to report child protection concerns to the appropriate channel, where it is believed a child is at risk of harm.

Staff will not leave sensitive data viewable on a computer screen or left on a printer/photocopier.

Staff will keep log in details secure and log off or lock their computer when not in attendance.

Only the secure, encrypted staff-issued memory sticks may be used for portable data, as outlined in our E-safety and Data Protection policies.

Sensitive or confidential information should not be taken from the school premises without the permission of the Headmaster.

All confidential or sensitive information will be securely disposed of in line with the school's retention and data protection policies.

***Honesty and Integrity***

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using school property and facilities.

Staff will not accept bribes. Gifts or hospitality that are worth more than £40 must be declared and recorded on the gifts and hospitality register.

Staff will ensure that all information given to the school about their qualifications and professional experience is correct.

***Dress Code***

Staff will dress in a professional, appropriate manner. For the avoidance of doubt, jeans are not suitable attire, with the exception of certain outings, such as farm visits.

Outfits will not be overly revealing and we ask that tattoos are covered up where possible.

Clothes will not display any offensive language or political slogans.

***Conduct outside of Work***

Staff will not act in a way that will bring the school or the teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the school on social media.

***Monitoring Arrangements***

This code will be reviewed by the Board annually, or earlier if circumstances dictate, as part of our safeguarding and child protection obligations.

Staff name \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

## **Appendix 5 Key Contact Information**

### ***Alpha Preparatory School***

The Designated Safeguarding Lead (DSL): *Mr. Pádraic Fahy (Headmaster)*

Contact details: Alpha Preparatory School (020 8427 1471)

The Deputy Designated Safeguarding Leads (DDSLs): *Miss Jennifer Trott (Deputy Head) and Ms Debbie Tipton (School Mentor)*

Contact details: Alpha Preparatory School (020 8427 1471)

Nominated Child Protection Governor: *Mr Keval Shah* Contact details: Governors can be contacted by writing to the school office at [sec@alpha.harrow.sch.uk](mailto:sec@alpha.harrow.sch.uk) (020 8427 1471)

Chair of the Governing Body: *Ms. Karen Brookes*

Contact details: the Chair Person can be contacted by writing to the school office at [sec@alpha.harrow.sch.uk](mailto:sec@alpha.harrow.sch.uk) (020 8427 1471).

The email address of the school office is: [sec@alpha.harrow.sch.uk](mailto:sec@alpha.harrow.sch.uk)

### ***External Contacts***

Harrow Children's Services can be contacted on the 'Golden Number' 020 8901 2690 to discuss concerns or make a referral. The Emergency Duty Team can be contacted out of hours on 020 8424 0999. In an emergency call 999.

The Harrow Local Authority Designated Officer (LADO) dealing with allegations against members of staff is Janice Miller. Contact details are 020 8736 6435 (Mon - Fri). For any other days please contact the Golden Number (020 8901 2690 or 020 8424 0999 out of hours). Email: [Janice.Miller@harrow.gov.uk](mailto:Janice.Miller@harrow.gov.uk)

The Harrow Local Safeguarding Children's Board website is [www.harrowlscb.co.uk](http://www.harrowlscb.co.uk) and is a source of information about safeguarding children in Harrow. Among many other resources, the Common Assessment Framework (CAF) form can be downloaded from their website.

The NSPCC helpline (0808 800 5000) is also available if you are concerned about a child. Their website ([www.nspcc.org.uk](http://www.nspcc.org.uk)) also provides a wealth of advice for parents and those that work with children.

## Appendix 6



### Record of Concern

(Attach a separate continuation page, dated and signed, if needed.)

<b>Pupil's Name</b>	<b>DOB:</b>	<b>Male/Female:</b>
Date and time of concern:		
Details of concern or disclosure (factual account of what was said, observed, reported and by whom - use pupil's own words where applicable):		
Additional information (context of concern/disclosure, siblings, etc.):		
Your response (what did you do/say following the concern?):		
Your name:	Signature:	
Your position in school:	Date/Time of recording:	
Action/response of DSL (or person receiving this form):		

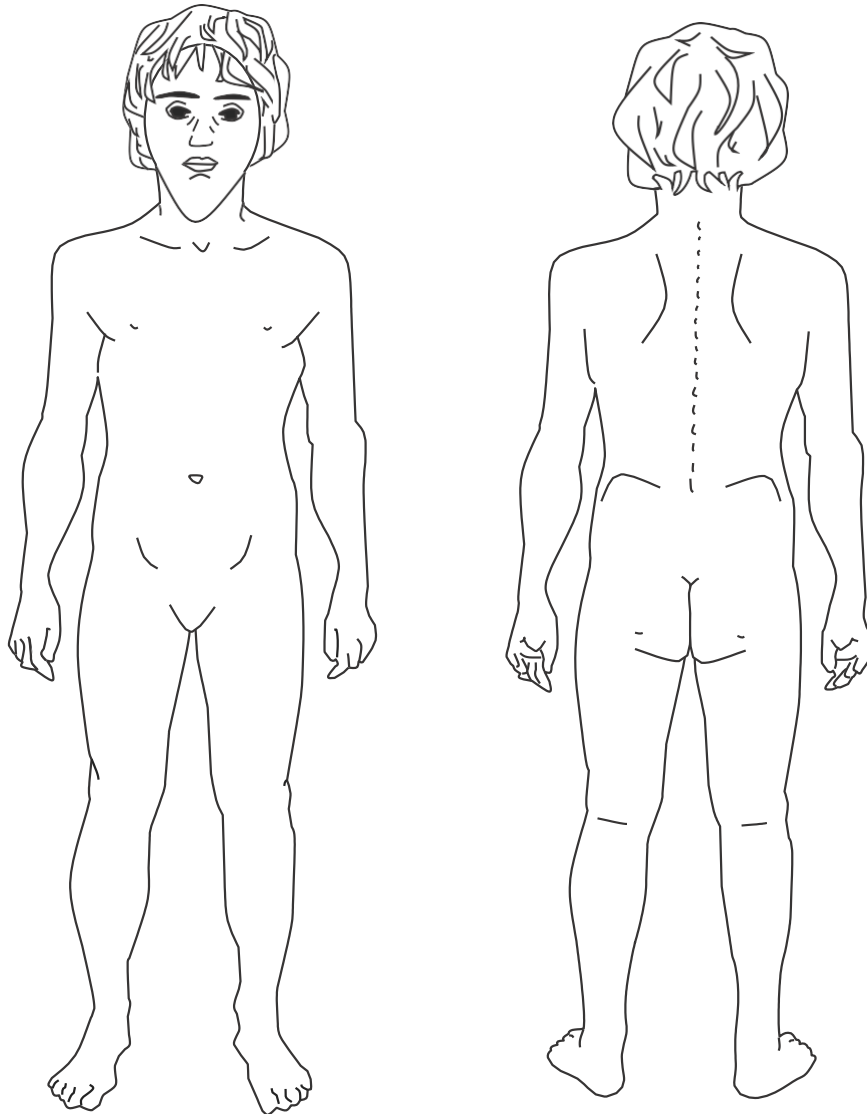
Complete and pass this form to the DSL, or if unavailable the Deputy DSL, as soon as possible on the same day the concern arises or disclosure is made. If the DSL and Deputy are both unavailable, pass this form to a member of the Welfare Committee. In an emergency, you may refer directly to Children's Social Care and details of contact numbers are on the Safeguarding Board in the staff room.

**Pupil's Name:**

**DOB:**

Body Chart (To be completed with Record concern form if pupil has an injury.)

This chart must be used together with the Concern form if needed. Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern/Disclosure Form refer to the injury using the same number and description.



**Observations made by:**

**Signed:**

**Date/Time:**

### Checklist for DSL

	Child clearly identified
	Name, designation and signature of the person completing the record populated?
	Date and time of any incidents or when a concern was observed?
	Date and time of written record?
	Distinguish between fact, opinion and hearsay
	Concern described in sufficient detail, i.e. no further clarification necessary?
	Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
	Record free of jargon?
	Written in a professional manner without stereotyping or discrimination?
	The record includes an attached completed body map (if relevant) to show any visible injuries



## **ALLEGATIONS OF ABUSE AGAINST STAFF**

### **This policy includes the EYFS.**

All actions will be in accordance with the Department of Education statutory guidance *Keeping Children Safe in Education (2021)*. For the purpose of this policy, the definition of staff includes volunteers working at the school.

All allegations of abuse made against a member of staff should be reported immediately to the Headmaster. Allegations about the Headmaster should be reported to the Chair of Governors, who will then contact the Local Authority Designated Officer (LADO). Contact details for the LADO and the Chair of Governors can be found at the end of this policy.

This policy will be used in any case where it is suspected or alleged that a member of staff or volunteer at the school 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 in a way that suggests they may be unsuitable to work with children

An allegation which meets the above criteria might indicate that a person would pose a risk of harm if they continue to work with children in their present position, or in any capacity. It is essential that allegations are dealt with as quickly as possible and in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

### **Procedures following an Allegation of Abuse by Staff**

The Headmaster or Chair of the Governors contacts the LADO immediately and a discussion will take place to decide whether:

- more information is required
- no further actions are needed
- a strategy discussion should take place
- there should be immediate involvement of the police or social care

The school will share information with the LADO about the allegation, the child and the person against whom the allegation has been made to help determine if a police investigation or strategy discussion is needed. Representatives from other agencies, such as health, social care and police, may be invited to the discussion.

Any internal investigation or disciplinary procedures must be secondary to any safeguarding investigation and will be delayed until discussion with the LADO and any resulting external investigation.

The following definitions should be used when determining the outcome of an investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation
  - *Malicious:* there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
  - *False:* there is sufficient evidence to disprove the allegation
  - *Unsubstantiated:* there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
  - *Unfounded:* to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### **Supporting those involved**

The school has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process for the member of staff involved. The person involved will be informed as soon as possible after the initial discussion with the LADO and advised on what the next course of action will be. They will be advised to contact their trade union representative or a colleague for support. However, if the police or social services are to be involved, they will be contacted before the member of staff, and will advise as to what information may be disclosed to the person under investigation.

The school will support the member of staff through the provision of a confidential welfare counselling service provided through the school insurers and a member of the school Welfare Committee will be appointed to keep the individual informed of the progress of the case and in the event of suspension, updated with work-related issues.

Parents/carers of a child involved in an allegation against staff will be also be informed if they do not already know, as soon as possible after discussion with the LADO. However, if the police or social services are to be involved, they

will be consulted first and will advise as to what information may or may not be disclosed to the parents/carers. A senior member of staff will be appointed to liaise with parents/carers and they will be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing and information used for making a decision are usually confidential, but parents/carers will be told the outcome in confidence.

Parents/carers will be made aware of the requirement to maintain confidentiality about any allegations made against staff while investigations are ongoing, as required by law.

Children's social care, the police or other agencies, if involved, will provide the school with advice on what type of additional support the child may need.

## **Confidentiality**

The school will make every effort to guard the privacy of all parties while an allegation is being investigated or considered. A breach of confidentiality will be taken seriously and may warrant its own investigation.

The law provides for reporting restrictions preventing the publication of any material which may lead to the identification of a member of staff as the subject of an allegation. The reporting restrictions apply until the point that the member of staff is charged with an offence or the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from an allegation. The reporting restrictions also cease to apply if the member of staff effectively waives their right to anonymity by going public themselves or giving their written consent for another to do so or if a judge lifts the restrictions in response to a request to do so.

## **Suspensions**

Suspension is not an automatic response and the school will not suspend a member of staff without serious consideration. Depending on the nature of the case, it may be possible that alternative arrangements are made so that the individual can continue working. The views of the LADO, police and social care will inform the decision. Suspension is a neutral act and not an admission of guilt. In the case of suspension, the member of staff will receive written confirmation within one working day and will be informed of the reason for the suspension.

## **Resignations**

If a member of staff resigns when the allegation is made against them or during an investigation, the investigation will continue until an outcome has been reached, with or without their cooperation, though they will be given full opportunity to answer the allegation.

Settlement/compromise agreements will not be used in situations which are relevant to these procedures.

## **Record Keeping**

Where an allegation is found to be malicious, it will be removed from the record of the member of staff.

For all other allegations, records of investigations and outcomes will be kept on the member of staff's confidential personnel file and they will be given a copy. Schools have an obligation to preserve records that contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse, for the term of the inquiry. All other records will be kept at least until the person reaches normal retirement age, or for 10 years if that will be longer, from the date of the allegation.

The purpose of the record is to enable accurate information to be given in response to any future requests for reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police which did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

## **References**

Cases where an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.

### **Action on conclusion of the case**

If an allegation is substantiated, the school may decide to dismiss the member of staff. A criminal offence, regardless of significant harm to a child, would be considered as gross misconduct and is liable to dismissal. The school will report the dismissal (or resignation before dismissal) of any member of staff, whether employed or contracted or volunteer or student, following a substantiated allegation to the Disclosure and Barring Service (DBS) for consideration for the person to be included on the barred lists. In the case of a teacher, the school will also refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

If the initial consideration with the LADO decides that the allegation does not involve a criminal offence, and after any child protection concerns have been discussed, the school will decide on the course of action required. If the nature of the allegation does not require formal disciplinary action, the school will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within fifteen working days.

If it is decided that a member of staff may return to school after suspension, then provisions will be put into place to be by the school to ensure that the transition is as smooth as possible. This may involve a phased return, the support of a staff mentor, reviewing the timetable to manage contact with a child involved in the allegation.

If the allegation is found to be unsubstantiated or malicious, it will usually be the case that the LADO/school will refer to children's social care services to determine whether the child concerned is in need of services or may have been abused by someone else.

If an allegation is shown to be malicious, the school will consider taking disciplinary action against the pupil who made it. If the allegation was made by a person who is not a pupil, the school may pass the information to the police who may take further action against that person.

### **Learning lessons**

No matter what the outcome is of an allegation of abuse against staff, the school will review the case to see if there are any improvements that can be made in its practice or policy that may help to deal with cases in the future.

## **Contact details**

### **LADO**

The Harrow Local Authority Designated Officer (LADO) dealing with allegations against members of staff is [Janice Miller](#). Her contact details are 020 8901 2690 (Monday – Friday). For any other days please contact the Golden Number (see below). Email: [Janice.Miller@harrow.gov.uk](mailto:Janice.Miller@harrow.gov.uk)

Golden Number 020 8901 2690. The Emergency Duty Team can be contacted out of hours on 020 8424 0999.

### **Chair of Governors**

Chair of the Governing Body: *Ms. K Brookes*

Contact details: the Chair Person can be contacted through the school office (020 8427 1471)