



Responsibilities

**Reception-Year 6:**

**Designated Safeguarding Lead (DSL):**

Susanna Gillett (Deputy Head)

[susanna.gillett@kgps.co.uk](mailto:susanna.gillett@kgps.co.uk)

02089485999 ext. 403

**Deputy Designated Safeguarding Lead (DDSL):**

Amy Kinross (Head of Data, Assessment and Compliance)

[amy.kinross@kgps.co.uk](mailto:amy.kinross@kgps.co.uk)

02089485999 ext. 414

**Company Director with responsibility for Safeguarding Matters:**

Theo Brehony - Managing Director

[theo.brehony@gardenerschools.com](mailto:theo.brehony@gardenerschools.com)

**Nursery (see separate policy):**

**Designated Safeguarding Lead (DSL):**

Chantal Baard (Head of Nursery)

[chantal.baard@kewgreennursery.com](mailto:chantal.baard@kewgreennursery.com)

**Deputy Designated Safeguarding Lead (DDSL):**

Katarzyna Sagan (Deputy Head of Nursery)

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Most recent update and review by DSL following updated guidance, September 2022



## Safeguarding Children Policy and Procedures (Reception-Year 6)

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### General Principles

The safety and welfare of our pupils at Kew Green Preparatory School is our highest priority. We are committed to providing a safe and secure environment for pupils, staff and visitors and promoting a climate where pupils and adults feel valued and respected and are confident about sharing any concerns which they may have about their own safety or the well-being of others.

This policy is applicable to all 'on' and 'off' site activities undertaken by pupils whilst they are the responsibility of the School. It is made available to parents on the school website and a paper copy is available in the school office upon request.

**Kew Green's Safeguarding Policy draws on the principles of the following documents:**

[Human Rights Act 1998](#)

[Equality Act 2010](#)

[Teacher Standards 2021](#)

[Statutory Framework for the Early Years Foundation Stage \(effective April 2017\)](#)

[Keeping Children Safe in Education \(DfE September 2022\) \(KCSIE\)](#)

[Working Together to Safeguard Children \(DfE December 2018, updated 2020\)](#)

[RSHE 2019 \(updated 2021\)](#)

[Information Sharing: advice for practitioners \(2018\)](#)

[Disqualification under the Childcare Act 2006 \(updated September 2018\)](#)

[What to do if You are Worried a Child is Being Abused \(DfE March 2015\)](#)

[The Prevent Duty Guidance for England and Wales \(July 2015\)](#) including [non-statutory advice \(June 2015\)](#) and a briefing note on the [use of social media for online radicalisation](#)

[Children Missing Education \(KRSCP Revised July 2021\)](#)

[Working Together to Improve School Attendance \(DfE May 2022\)](#)

Independent Schools' Inspectorate: Handbook for the Inspection of Schools, the Regulatory Requirements

Sharing of good practice: DSL attends regular meetings with DSL from South West London Independent Association of Preparatory Schools, which feeds back to KRSCP for Richmond

[Procedures produced by the Kingston and Richmond Safeguarding Partnership \(KRSCP\) for Richmond](#)



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### **KGPS Safeguarding Appendices:**

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## Safeguarding Children Policy and Procedures (Reception-Year 6)

### 1. Duty of Care

This school recognises its duty of care, to work with other agencies in protecting children from harm and responding to abuse. In line with the statutory requirements as specified in the documents referred to above, regarding children's welfare, suitability of people working within the school and appropriate environments, we are committed to:

- Taking necessary steps to safeguard and promote the welfare of children
- Promoting the good health of the children, taking necessary steps to prevent the spread of infection and taking appropriate action when they are ill
- Managing children's behaviour effectively and in a manner appropriate for their stage of development and particular individual needs
- Ensuring that adults looking after children, or having unsupervised access to them are suitable to do so through thorough records of evidence of identity
- Maintaining records, policies and procedures required for the safe and efficient management of the school to meet the needs of the children
- Ensuring adults looking after children have appropriate qualifications, training, skills and knowledge
- Ensuring that all staff (part time and non-teaching staff) have regular training in Safeguarding, which is updated at least every 2 years, in accordance with advice from the Local Safeguarding Children Partnership
- Ensuring that all staff (including part time, voluntary and non-teaching) have read and sign their agreement to comply with school Safeguarding Policy
- Ensure that all regular volunteers (4 days in 30, or once a week –both with the same children) complete thorough vetting process
- Ensure that the DSL, DDSL and Director with responsibility have relevant training in Safeguarding
- Ensure that DSL and DDSL meet regularly for updates and conference of issues
- Organising staffing arrangements to ensure safety and to meet the needs of the children
- Ensuring outdoor and indoor spaces, furniture, equipment and toys are safe and suitable for their purpose through risk assessments
- Ensuring staff in a one-on-one situation are clear on safeguarding procedures to protect all involved
- Planning and organising our systems to ensure that every child receives an enjoyable and challenging learning and development experience that is tailored to meet their individual needs

As part of our commitment we will ensure that we have all pupil records from previous schools. We will in turn forward school records to prospective schools if there has been a safeguarding issue under separate cover from the school report, direct to the relevant safeguarding person. Any non-arrival and/or long-term absence of pupils is followed up by the Head of Section.

### 2. Introduction

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure that their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. Staff should not assume that somebody else will take action: they should always share information with the Designated Safeguarding Lead (or DDSL) that might be critical in keeping children safe.



## Safeguarding Children Policy and Procedures (Reception-Year 6)

Recognising or suspecting that a child is being abused may be stressful and upsetting. It is easy for people to believe that it couldn't happen to children for whom they care. At KGPS, we work with the understanding that 'it could happen here.'

Children are harmed in all sorts of families and in most instances the person causing the harm is well known to the child. It is important to recognise that abuse to a child can occur not only by the conscious act of abuse but by the omission of providing an adequate environment for the child to grow and develop.

All staff should be alert of the possibility that a child may be being abused and to know what to do should they be concerned about a child's welfare. This abuse, which may be emotional, mental, physical, sexual or neglect, may manifest itself in unusual and worrying patterns of behaviour and/or visible signs of injuries. This document outlines the procedures to be followed in those circumstances in which child abuse is suspected and highlights that children can also be abused by their peers.

All staff should be familiar with the procedures for keeping a confidential, written record of any incidents and with the requirements of the Kingston and Richmond Safeguarding Children Partnership <http://kingstonandrichmondKRSCP.org.uk>

At KGPS, we recognise our duty of care is to work with other agencies to protect children from harm and respond to abuse. Our policy is to report all cases where the wellbeing of a child is threatened, to the relevant Local Authority Specialist Children's Services or local police force and to log this information in the Child Protection File. All schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements in line with statutory guidance [Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk). From September 2019, new safeguarding partners have been set up: the local authority, a clinical commissioning group and the chief of police, will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. School and colleges should work with these agencies to promote the welfare of children and protect them from harm.

All staff are well placed to observe the outward signs of abuse, it is therefore important that the school:

- Maintains an environment where children feel secure, are encouraged to talk and are listened to.
- Ensures that children know that there are adults in the school whom they can approach if they are worried.
- Supports children who have been abused, in accordance with his/her agreed child protection plan.
- Includes opportunities in the PSHEE curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- Follows a policy of safe recruitment, checking the suitability of all staff and volunteers.
- Ensures all staff are familiar with the policy and follow procedures detailed in this document promptly when child abuse is suspected.
- Ensures all staff are trained in child protection and any part time voluntary staffs who work with the children are made aware of the arrangements.
- Designates a senior member of staff as Safeguarding Lead, with Deputy.
- Ensures that all staff that have access to children have very clear guidelines on how they should interact with children.
- Ensures the Board of Directors undertakes a rigorous annual review of the school's child protection policies and procedures and of the efficiency with which the related duties have been discharged and corrects any deficiencies or weaknesses in child protection arrangements without delay.



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### 3. Role of the Proprietors

The Proprietors take seriously their responsibilities under Section 175 of the Education Act 2002 and Section 87 of the Children's Act 1989 to safeguard and promote the welfare of children and to work together with other agencies to ensure that they comply with their duties under legislation and that adequate arrangements within the school to identify, assess and support those children where there are concerns about a child's safety and welfare. This is done in line with "Working Together to Safeguard Children" 2020, through effective implementation of the safeguarding policy and procedures and effective communication and good cooperation with local agencies. As per KCSIE 2022, proprietors are 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 (see p.24-26 of KCSIE 2022 for further details).

The Proprietors of the school will ensure that policies, procedures and training are effective and are compliant with the law. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

The Proprietors will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority. This includes ensuring that a designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the local authority, the most recent care plan, contact arrangements with parents and delegated authority to carers, and that this information is available to the DSL. Please refer to *Looked After Child Policy*.

The Proprietors will ensure that the school contributes to interagency work where appropriate, for example supporting pupils and staff with the implementation of child protection plans.

The Proprietors should consider how children may be taught about safeguarding, including online, through the curriculum and PSHEE. Particular attention should be paid to the school's practices to help children to adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet.

The Proprietors have appointed a senior member of staff to lead on safeguarding (Susanna Gillett) who is on the Senior Leadership Team and will liaise with the local authority and other agencies and is given the time and training to support staff on child welfare and safeguarding matters.

The Proprietors have appointed a Director, Theo Brehony, who is nominated to liaise with the Local Authority or other agencies in the event of allegations of abuse being made against the Head and is responsible for reporting such allegations directly to the LADO. If an allegation is made against the Head, staff will pass on their concerns directly to the Company Director with Responsibility for Safeguarding Concerns without informing the Head. Any allegations against staff or volunteers should be referred to the LADO. Where allegations are substantiated, referrals will be made as required to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA). This is a legal duty and failure to refer when the criteria are met is a criminal offence.

The Safeguarding Director is responsible for taking the lead in relation to responsibility for the school's safeguarding arrangements as well as ensuring the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Proprietors must ensure that staff members always act in the interests of the child.



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The Board of Directors undertake a rigorous annual review of the school's safeguarding procedures and of the efficiency with which the related duties have been discharged. Each year, the proprietor will sign off the newly updated policy.

The Proprietors are aware that they have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

Governing bodies and proprietors should recognise the expertise staff build up by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy to ensure it is up-to-date and relevant to the setting our children are in.

### **4. The Responsibilities of staff**

The Designated Safeguarding Lead (DSL) for the whole school is Susanna Gillett (Deputy Head). The Deputy DSL is Amy Kinross (Head of Data, Assessment and Compliance). Their roles and the policy apply to all children within Kew Green Preparatory School from Reception-Year 6.

All adults working in this school (including visiting staff, volunteers and students on placement) are required to report instances of suspected or actual child abuse or neglect to the DSL or, in her absence, the Deputy DSL.

Any concerns about the conduct of a member of staff should be reported to the Head. If the Head is unavailable, or the allegation is against her, the matter should be reported to the Director with specific responsibility for safeguarding. Any concerns related to the Head should be made without informing her. If an allegation related to a member of supply staff provided by an agency, the agency must be fully involved in the investigation and the school should ensure they are kept informed throughout.

If the allegation is made against a Director, the school should follow their own local procedures. Where an allegation is substantiated, the school should follow the procedures to consider removing them from post.

All staff are aware that if they have safeguarding concerns about another member of staff (including volunteers, supply staff, tradespersons and visitors) they should speak to the Head without delay.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. If staff were unable to raise an issue with the leadership team, or if there was a conflict of interest in reporting to the Head, Company Director or Proprietor, staff can call 0800028 0285 and contact the NSPCC whistleblowing advice line. Alternatively, they can be contacted via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Staff are also aware they can pass on any concerns directly to the LADO themselves, be it about an adult or child.

All staff members must be aware of the child protection systems in school, and all should maintain an attitude of 'it could happen here' where safeguarding is concerned.

Any staff member can refer their concerns to children's social care directly.

### **The Head**

- Where an allegation is made against an adult (a paid member of staff or a volunteer) working at the school, the Head will refer the matter without delay to the LADO and to the police (if a criminal offence is suspected).



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- Any allegations against the DSL should be reported directly to the Head

### Designated Safeguarding Lead

- The Designated Safeguarding Lead is the first point of contact for all staff with any concerns relating to children or adults within KGPS.
- The DSL or DDSL will always make themselves available to discuss safeguarding concerns. If, in the rare event that all are out of school at the same time, they can be contacted by email or mobile phone. All members of staff are provided with the mobile phone contact details for the DSL.
- The DSL is also the contact for external agencies who are pursuing Child Protection investigations and co-ordinates the school's representation at Child Protection conferences and Core Group meetings (including the submission of written reports for conferences). The DSL will make prompt contact with Children's Social Care where there are concerns that a child may be in need of help or at risk of harm, in line with the school policy.

### Management and monitoring of Safeguarding policy and procedures

The DSL shall:

- Regularly liaise with the Health and Safety Committee to ensure a secure and safe physical environment for the children to minimise risk of physical injury and to identify areas which may be considered 'problem places'.
- Liaise with the Head to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#). (KCSIE 2022)
- Produce effective, compliant safeguarding documents and ensure all staff are familiar with the contents. Ensure these are updated and reviewed as necessary.
- Ensure the 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.
- Induct all staff on the school policies and procedures for dealing with suspected concerns regarding children's welfare as well as abuse/bullying ensuring all staff have up to date knowledge of safeguarding issues.
- Ensure that staff understand their responsibilities; are able to identify and are alert to the possible signs of abuse and neglect and act at the earliest opportunity, responding in a timely and appropriate way by knowing the reporting procedures and referral process.
- Induct all staff on the need for professionalism and whistle blowing, reiterating our culture of safety and of raising concerns. Procedures for reporting and handling concerns, the provision of mediation and dispute resolution are detailed within this Safeguarding Policy.
- Ensure appropriate safeguarding documents are given, discussed, understood and agreement to comply obtained from all staff.
- Provide, maintain and securely store confidential records of any concerns logged on CPOMS and any associated evidence.
- Maintain CPOMS, where staff record concerns regarding children as well as inappropriate behaviour towards them by children. (see appendix)



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- Regular reviews of cases that have been raised with Deputy DSL, Head and Senior Leadership Team.
- Ensure where children leave the school that their child protection file is copied for any new school and transferred separately from the main pupil file
- Ensure all staff have basic training in child protection which is reviewed every 2 years (copies of training undertaken is filed with Director of Studies)
- Ensure that all staff are aware of their responsibilities regarding online safety for children and themselves in line with our online safety policy.
- Undertake regular inter-agency training every 2 years in order to:
  - Understand the assessment process for providing early help and intervention
  - Have a working knowledge of how LA conducts a child protection case conference
  - Be alert to the specific needs of all children in need.
  - Promote a culture of listening
  - Promote a culture of vigilance for safeguarding within school
- Ensure all staff have enhanced DBS checks, in liaison with the HR Advisor.
- Ensure all staff (including temporary, supply, volunteer parents) read and sign Safeguarding Guidelines, having read and understood the Safeguarding Children Policy and Keeping Children Safe in Education (Part 1 and Annex A) (DfE September 2022), as well as Staff Code of Conduct. Each time part 1 of KCSIE is updated, existing staff must be updated.
- Maintain links with other professional bodies and have a clear understanding of the Local Authority referral procedures with regular meetings throughout the academic year. DSL will attend twice yearly meetings with inter borough schools directly after the Local Safeguarding Board meetings for dissemination of information and agreed processes, as well as feedback for good practice. This is currently operating online through DSL Network Meetings.
- Where a Common Assessment Framework (CAF) has been put in place, liaise with CAF representative when relevant, to ensure efficient flow of information as necessary
- Ensure that any deficiencies or weaknesses in Safeguarding arrangements or procedures are remedied without delay.
- Invite the Directors to carry out a thorough and robust audit of Safeguarding policies and procedures annually.
- Provide the Directors with a termly review of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged.

### Deputy Designated Safeguarding Lead

The role of the Deputy is to support the DSL specifically in regular discussions about children and updating records as required and to take on the role of DSL in the absence of the nominated Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead is trained to the same level as the DSL and, in the absence of the DSL, is able to undertake all of the roles and responsibilities that the DSL would normally have.



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### Board Director with specific responsibility for Safeguarding

The Board Director with specific responsibility for Safeguarding is Theo Brehony.

The Director will:

- be responsible for undertaking rigorous annual reviews of the policies and procedures that apply to all areas of safeguarding and of the efficiency with which the related duties have been discharged.
- be responsible for receiving and discussing updates provided by the Designated Safeguarding Lead.
- If advised to do so by the LADO, the Board Director will lead investigations where allegations are made against the Head.

### 5. Staff Training

All staff (including Directors, as per KCSIE 2022) must read and understand at least Part One and Annex A of Keeping Children Safe in Education. Each time Part One is updated by the DfE, existing staff must be informed and asked to re-read the information and confirm understanding. Annex B contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those who work directly with children should also read this annex.

The Designated Safeguarding Lead and the Deputy DSL(s) must receive child protection training every two years. This should include multi-agency working protocols and training in the KRSCP's approach to *Prevent* duties.

As part of their induction process, all new staff, including temporary staff and volunteers, will be provided with induction training that includes:

- the school's child protection policy including the whistleblowing procedure
- the staff code of conduct
- the online safety policy
- the pupil behaviour policy
- the identity of the DSL and DDSL
- a copy of Part 1 and Annex A of KCSIE.
- a copy of Annex B of KCSIE for leaders and those who work directly with children

All staff will receive refresher Safeguarding Training each year. This will either be provided 'in house' by the DSL or by a member of the Kingston and Richmond Borough Safeguarding Team. The training will include the KRSCP's approach to *Prevent* duties and any updates to KCSIE, such as the addition of 'humiliating pupils' as a low-level concern, the significance of the Equality Act 2010 and the importance of a clear procedure for sharing low-level concerns confidentially.

### 6. Setting the context

All those who come into contact with children have a duty to safeguard and promote their welfare. Children's worries and fears will be taken seriously if they seek help from a member of staff and children must never feel they are creating a problem or feel ashamed for making a report. Staff cannot guarantee confidentiality as concerns may lead to referrals to the appropriate agencies in order to safeguard the child's welfare. Staff will inform and involve victims in the process so they feel confident in how their concern will be dealt with.



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As per KCSIE 2022, all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children 9 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 communication.

### Definitions

#### 6.1 Definition of Child Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

#### 6.2 Significant Harm

Some children are in need because they are suffering or are likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The Local Authority is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm (s47 of the Children Act 1989).

#### 6.3 Child in Need

Children who are defined as being 'in need', under the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services (s17(10) of the children act 1989). The critical factors to be taken into account in deciding whether a child is in need under the Children Act 1989 are what will happen to a child's health or development without services, and the likely effect the services will have on the child's standard of health and development.

#### 6.4 Children with special educational needs and disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEND can be disproportionately impacted by issues such as bullying without showing any signs; and children with SEND can be more prone to peer group isolation than other children; and
- communication barriers may exist causing difficulty with investigating what the underlying issues are.

In such cases, additional pastoral support for children with SEND should be considered if there are any concerns that the child might be at risk.



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### 6.5 Children who are lesbian, gay, bi or trans (LGBT) (KCSIE 2022)

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. 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.

### 6.6 Types of abuse and neglect (from KCSIE 2022)

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

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

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

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

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



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

### 6.7 Signs and Indicators of possible abuse

The recognition that a child may be being abused can be very difficult. Abuse or possible abuse may come to the attention of staff through the following indicators:

- The child telling someone about the abuse
- Extreme mood swings
- Depression and withdrawal
- Lethargy, unwillingness to be involved
- Unwillingness to communicate
- Unexplained delay in seeking treatment which is needed
- Constant minor injuries
- Unexplained bruising
- Physical signs, such as an injury which arouses cause for concern
  - Bruise marks in or around the mouth
  - Black eyes, especially if both eyes are black and there are no marks to forehead or nose
  - Grasp marks
  - Finger marks
  - Bruising of the ears
  - Linear bruising (particularly buttocks or back)
  - Bruises of differing ages
  - Bite marks
  - Burns (including cigarette burns) and scalds
- General physical disability
- Unresponsiveness in the child
- Soiling and wetting
- Change in behavioural patterns
- Attention seeking
- Apprehension
- Antisocial behaviour
- Unkempt appearance
- Sexually precocious behaviour
- Sexualised drawings and play
- Sudden poor performance in school
- Poor self-esteem
- Self-mutilation
- Running away or going missing
- Reluctance to return home after school
- Resistance to PE (undressing)
- Difficulty in forming relationships
- Confusing affectionate displays
- Poor attendance – repeated infections etc.



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In addition, staff should be alert to inappropriate behaviour by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities or inappropriate sharing of images. Any concerns about the inappropriate behaviour of an adult working in the school must be reported immediately to the Head, to the Company Director with Responsibility for Safeguarding Matters or to the LADO.

### 7. Specific Safeguarding Issues

As with all safeguarding issues involving children, the DSL should be informed at the earliest opportunity.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example [NSPCC](https://www.nspcc.org.uk) offers information for schools and colleges on the [TES website](https://www.tes.com) and also on its own website [www.nspcc.org.uk](https://www.nspcc.org.uk).

Annex B in KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues. All leaders at KGPS and those who work directly with children should read this annex.

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- Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or tension of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.



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Children in Year 6 are able to walk to and from school by themselves, with express parental permission. The school provides guidance on outdoor safety, supported by Richmond and Wandsworth Council. Children have practical advice on how to keep themselves safe. We aim to build the child's confidence and abilities rather than simply warning them about all strangers or dangers.

- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing crimes or serious violence against others.

Children can become trapped by this type of exploitation. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As they can become involved in crimes themselves, their vulnerability as victims is not always recognised by adults and/or professionals.

CSE is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

In some cases of either CCE or CSE the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education
- have older boyfriends or girlfriends (KCSIE 2022)



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- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant (KCSIE 2022).

Any concerns about CCE or CSE should be passed without delay to the DSL. The school is aware, as per guidance in KCSIE 2022, that children may not feel ready to report concerns or know how to tell someone that they are being abused. The school is also aware that a child may not be able to recognise the coercive nature of the abuse and may not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other victim of abuse. Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Further information on signs of a child's involvement in sexual exploitation is available in Annex B of KCSIE 2022 and Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

- County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line.'

Children can be targeted and recruited into county lines in a number of locations, including schools.

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

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

Further information on the signs of a child's involvement in county lines is available in Annex B of KCSIE 2022, [guidance published by the Home Office](#) and [The Children's Society County Lines Toolkit For Professionals](#) (KCSIE 2022).



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- Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support [children 5-11-year olds](#) as well as a guide for older children.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an [online child arrangements](#) information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

- Children missing from education

All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any additional educational needs they may have. A child going missing from school or home is a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. All staff are informed of the separate procedures to be used for searching for, and if necessary, reporting, any pupil missing from school. These procedures have regard to relevant statutory and KRSCP guidance in respect of School attendance (September 2021); children missing from home or care (January 2014); Children Missing Education (September 2016).

- Please see the School's separate Attendance Policy and Supervision of Pupils Policy for further details. These procedures include

(a) safeguarding responses to children who go missing from education, particularly on repeat occasions, which help identify the risk of abuse and neglect and which help to prevent the risks of the child going missing in future; (b) the requirement (A) to record any incident, the action taken and the reasons given by the pupil for being missing; (B) to notify the local authority when the school is about to remove or add a pupil from or to the school admission register at a non-standard transition point; and (C) to make reasonable enquiries to establish the whereabouts of a child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1)(h), namely that the child has been continuously absent from the school for a period of twenty school days or more.

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

All staff are aware of their roles to protect children from going missing in education.

- Children with family members in prison

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



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- Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' or 'cyber dependent'. Annex B of KCSIE 2022 details the form crimes can take.

It is important for staff to recognise that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If concerns arise in this area, the DSL or a DDSL will consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office.

- Domestic Abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact on children, as victims in their own right if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex partners and family members. 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. As per KCSIE 2022, children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

With any child under the age of 18, where there are concerns about safety or welfare, the school will follow the same procedures for referral and will offer victims and perpetrators appropriate support.

Annex B in KCSIE 2022 has further information on [Operation Encompass](#) and the National Domestic Abuse Helpline (page 145-6).

For further information, see the DfE guidance: [domestic violence](#)

- Homelessness

Being homeless or being at risk of becoming homeless present a real risk to a child's welfare. The DSL and DDSLs are aware of the contact details and referral routes into the Local Housing Authority (020 8891 7409) or [housingadvice@richmond.gov.uk](mailto:housingadvice@richmond.gov.uk)

While referrals and /or discussion with the Local House Authority will be progressed where appropriate, it will not replace a referral into children's social care if a child has been harmed or is at risk of harm.

- Mental health

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.

More information can be found in the [Mental health and behaviour in schools guidance](#). Promoting awareness of mental health is a key part of our PSHEE curriculum.



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- Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If any concern arises for a child, the member of staff should pass this on immediately and without delay to the DSL or DDSL.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance: [Modern slavery: how to identify and support victims - GOV.UK](#)

- Preventing Radicalisation, The Prevent Duty and Channel

Similar to protecting children from other forms of harms and abuse, protecting children from this risk forms part of our Safeguarding Policy and culture at Kew Green Preparatory School.

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism, known as "the Prevent duty".

The DSL is the designated Prevent Duty person responsible for co-ordinating action within the school and liaising with other agencies. Although the school assesses the risk to be low at present, the school will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with pupils when appropriate in suitable forums and providing training to staff to ensure that they are able to identify pupils at risk and know how to intervene.

In addition, an online general awareness training module is available on Educare, which all members of staff can access.

There is no single way of identifying an individual who is likely to be vulnerable to being drawn into terrorism. It can happen in many different ways and settings. Specific background factors may contribute to vulnerabilities which are often combined with specific influences such as family, friends or online and with specific needs for which an extremist group may appear to provide an answer. The internet and use of social media in particular has become a major factor in the radicalisation of young people. Factors that may have a bearing on someone becoming vulnerable include, but are not limited to: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

Where a child or children have been identified as being at risk of radicalisation, the DSL must be informed and he will refer to Children's Social Care. CSC will involve the Channel multi-agency programme if considered appropriate.



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The DSL will also assess and manage appropriately any risks identified in the vicinity of the school including those posed by any visiting speakers. The school will work in partnership with the tri-Borough KRSCP over such matters; the level of risk will determine the most appropriate referral. Further information is available from the government [Channel guidance](#) on radicalisation.

- Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB).

KGPS has a zero-tolerance approach to sexual violence and sexual harassment, which is made clear as recommended in KCSIE 2022. Any report will be taken seriously and will be addressed as per policy. Staff understand that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported, and they remain vigilant. Staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Consent is a key area in our PSHEE curriculum.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out in Part Five of KCSIE 2022. **Immediate consideration** should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted, for example intra familial harms or siblings).

Detailed advice is available in Part five of KCSIE 2022.

- Serious violence

All staff should be aware of indicators which may signal that 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



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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.

- So- called 'honour'- based abuse (including Female Genital Mutilation ((FGM)), Mandatory Reporting of FGM and Forced Marriage)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, as well as other 'honour' based practices such as breast ironing and forced marriage.

If staff have any concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL or a DDSL as soon as possible. Following our safeguarding procedures, the DSL or DDSL will activate local safeguarding procedures as appropriate, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM has a mandatory reporting duty placed on teachers which requires a different approach. Please see below.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place include knowing both that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school. The child may also talk about a special procedure/ceremony that is going to take place. Indicators that FGM may already have occurred include prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems. Some teachers have described how children find it difficult to sit still and look uncomfortable, or may complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

There is a mandatory reporting duty for all teachers in respect of FGM. Where a teacher discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she must personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. Information on when and how to make a report can be found here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Unless there is a good reason not to, the teacher should also consider and discuss the case with the DSL and involve CSC as appropriate. A teacher is not under this duty if:

- (A) s/he has reason to believe that another teacher has already reported the case;
- (B) in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). For example, staff may hear about the possibility of FGM happening or having happened to a pupil's family member, e.g. sister/female cousin:



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- A teacher may hear reference to FGM in conversation between pupils;
  - A child may confide that a sister/cousin is to have a 'special procedure' to become a woman;
  - A child may report that their sister/cousin is going out of the country for a prolonged period;
  - A child may disclose the worry about a sister/cousin being at risk;
  - Parents may withdraw a child from any learning about FGM.

(C) and/or (c) where the woman is 18 or over.

In all such cases, teachers should follow normal safeguarding procedures and discuss their concerns with the DSL immediately. The duty does not apply to non-teaching staff who should discuss any concerns that a child may be at risk of FGM with the DSL immediately.

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage> (KCSIE 2022).

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

- Additional advice and support

A range of resources are available to staff that will provide further advice and support. They can be located as part of [KCSIE 2022 Annex B, p.154-160](#).

### 8. 'Child-on-child' Abuse

As per KCSIE 2022, what used to be called 'peer-on-peer' abuse is now referred to as 'child-on-child' abuse. All staff should recognise that children are capable of abusing their peers. Abuse should never be tolerated or passed off as "banter" or "part of growing up". Child-on-child abuse can manifest itself in many ways including but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- sexual violence, such as rape, and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (sexting, also known as youth produced sexual imagery); initiation/hazing type violence and rituals.



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Staff at KGPS know that addressing inappropriate behaviour (however innocuous it may appear) can be an important intervention.

The statistics of abuse show that it is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Underpinning our response is a zero tolerance to sexual violence or harassment.

Through our PSHEE programme (which incorporates SMSC), we aim to minimise the risk of child-on-child abuse by teaching children the values of respect, kindness, tolerance and being alert to the signs of bullying. Children are encouraged to raise any concerns they might have with a teacher, their parent or another trusted adult.

Allegations of abuse by one or more pupils against another pupil, when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, are taken very seriously. The school's initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting child-on-child abuse, nor should a victim ever be made to feel ashamed for making a report.

If such an allegation is made, the member of staff to whom the disclosure is made will immediately inform the DSL, who will inform the Head. The DSL will consult with the relevant Children's Social Care referral point and the Designated Safeguarding Director where appropriate.

Suspension of the child against whom the allegation has been made needs careful consideration and the Head will seek advice from the KRSCP before deciding on the course of action to be taken.

Children alleged to have sexually abused another pupil should be subject to a risk assessment for their continuing education on site, in consultation with the KRSCP.

All children involved, whether perpetrator or victim, should be treated as "at risk" in recognition of the fact that children who are abusers may be victims of abuse themselves and will require additional support from the school and possibly other agencies. Support in school may include provision of an adult mentor from the staff and/or organisation of one-to-one counsellor from a trained professional.

- Sexting

Staff should be alert to the issue of "sexting" between children in Kew Green Preparatory School. Child Exploitation Online Protection Centre (CEOP) has [specific advice](#) about this issue. [LGFL 'Undressed'](#) provided schools 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.

Sexting refers to both images and videos where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;



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- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; and
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

If a member of staff becomes aware of an incident involving sexting they should follow the safeguarding procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the imagery.

The victim(s) may be unaware of the abuse that has taken place and the school will need to offer support and protection for that individual(s).

All staff are expected to uphold the school's safeguarding culture and must always address inappropriate behaviour (even if it appears relatively innocuous) to intervene and potentially prevent abuse and/or violent behaviour in the future. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the imagery.

- Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force in April 2019. It is a criminal offence and allegations of upskirting must be passed on to the DSL or a DDSL who will work alongside children's services and the police.

For further advice, refer to Part 5 of Keeping Children Safe in Education (2022).

If staff have a concern about a child or a child makes a report, then they should follow the referral process as set out in [the flow-chart on p.22 of KCSIE 2022](#). As is always the case, if staff have any doubt as to what to do, they should speak to the DSL or DDSL without delay.

### **9. What action should staff take if they suspect a child is being abused?**

Remember it is not your responsibility to decide if a child has been abused. However, it is your duty to act on your concerns by referring them to the DSL. Some of the biggest failures in protecting children from abuse have occurred through omission rather than commission. When in doubt, always seek advice from the DSL.

It is our policy to refer all cases where the immediate safety of a child is threatened to Children's Social Care without prior discussion or agreement with the child's parent, although we will seek to engage with parents beforehand where possible and this will be on a case-by-case basis.

Staff who have concerns that a child is at risk MUST report them to the DSL without delay. Such discussion and agreement must not place a child at increased risk of significant harm.



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We differentiate between the safeguarding of a child who has suffered or is at risk of suffering serious harm and a child who is in need of Early Help from one or more agencies. The former would be reported to Children's Social Care immediately; the latter should lead to multi-agency assessment using local processes including use of the "Common Assessment Framework (CAF)" and "Team around the Child" (TAC) approaches.

### Identification of children who may benefit from Early Help

All staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. As per KCSIE 2022, multi-agency early help will work best when placed alongside a strong school policy, preventative education and engagement with parents and carers: we employ this philosophy at KGPS.

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

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

If Early Help is appropriate, the DSL (or Deputy) will generally lead on liaising with other agencies and setting up a multi-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Further information about Early Help can be found in Chapter 1 of [Working Together to Safeguard Children \(July 2018\)](#).

Ultimately it is the responsibility of all staff to

- take action by making a referral to the DSL so that the child can receive the right help at the right time to address risks and to prevent issues from escalating;
- recognise the early signs of abuse, neglect and radicalisation and refer to the DSL;
- keep clear records which should be passed to the DSL;
- listen to the views of the child;
- reassess concerns when situations do not improve;
- share information quickly; and
- challenge inaction.



## Safeguarding Children Policy and Procedures (Reception-Year 6)

### Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors (KCSIE 2022):

In most instances, staff are to report and refer to the headteacher if they have safeguarding concerns about another member of staff who could pose as a risk of harm to children.

Where there are concerns/allegations about the Head, this should be referred to Theo Brehony, the Company Director who oversees Safeguarding.

In the event where concerns/allegations present a conflict of interest in reporting to the Head or Company Director on the governing board, then the concern should be reported directly to the LADO.

Kew Green works hard and is committed to creating the right culture and environment, so staff feel comfortable to discuss matters both within, and where it is appropriate, outside the workplace in relation to safeguarding the children under our care.

It is important to note that the welfare of the child must be at the centre of all approaches taken regarding allegations. The DSL is responsible for ensuring that the child is not at risk and that any cases of suspected abuse are shared immediately with the local authority children's social care.

**In Part Four of KCSIE 2022, it outlines the two levels of allegation/concern.**

**1) Allegations that may meet the harms threshold**

**2) Allegation/concerns that do not meet the harms threshold- referred to as 'low level concerns'**

#### 1) Allegations that may meet the harms threshold

The following guidance should be followed where it is alleged that anyone working in the school has:

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

There are two different routes of action depending on whether the allegation is made against a member of staff or volunteer working at the school, or another adult who does not work at the school:

A. If a child has made an allegation OR you have your own concerns about the behaviour of another member of staff or volunteer who currently works at the school:

It is imperative that all who deal with allegations made against a teacher, other member of staff or volunteer maintain an open and inquiring mind and takes the allegations seriously. They must be dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child but also supports the person who is the subject of the allegation.

The rights of the child and member of staff must be considered. However, where there is a conflict of interest between the adult and the child, then the child's interests must be paramount as required by the Children Act 1989.

1. Do not take any action that could jeopardise a police investigation, such as attempting to investigate the allegation of abuse or by asking leading questions.
2. Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on the form, and ask them if they have told anyone else.



## Safeguarding Children Policy and Procedures (Reception-Year 6)

3. If your information comes from a child, don't make any promises of confidentiality. If the child asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. Instead say that you will pass this information on to someone who has been trained to deal with these situations.
4. Keep all evidence secure whilst being completed, including any notes you may have made in rough.
5. **Once you have logged the incident on the form, recording all relevant details of the concern, you must pass this on to the Head immediately.** If the Head is unavailable, or the allegation is against her, then you should report your concern to the Director with responsibility for Safeguarding.
6. If there is reason to believe that a child (or children) has suffered, or is suffering, actual harm, then a referral must also be made to Children's Social Care. The Head will usually delegate this action to the DSL but may choose to do this himself and inform the DSL of his action (unless the allegation involves the DSL).
7. There are legal restrictions on the reporting or publishing of allegations against teachers and schools must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.
8. **Take no further action unless requested by the Head or DSL.**

### Follow up action to be taken by the Head of School (or Director with responsibility for safeguarding)

If the allegation meets any of the following criteria the Head should report it to the Local Authority Designated Officer (LADO) the same day:

- o a member of staff has behaved in a way that has harmed a child, or may have harmed a child;
- o a member of staff has possibly committed a criminal offence against or related to a child; or
- o a member of staff has behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

### Initial consideration

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The designated officer(s) should be informed of all allegations that come to the School's attention and appear to meet the criteria so they can consult police and Children's Social Care services as appropriate.

The following definitions should be used when determining the outcome of allegation investigations:

- **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.

The Head, or (where the Head is the subject of an allegation) the Director with Responsibility for Safeguarding, should discuss the allegation immediately with the designated officer(s). The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as



## Safeguarding Children Policy and Procedures (Reception-Year 6)

previous history and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken regarding the individual facing the allegation or concern. In this case, this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement should be reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow, both in respect of the individual facing the concern and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. The Board of Directors will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working together to safeguard children. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school staff.

However, in other circumstances, such as lack of appropriate resource within the school, or the nature or complexity of the allegation, the allegation will require an independent investigator.

### Dealing with allegations of abuse by one or more pupils against another pupil

Staff should recognise that children are capable of abusing their peers. Abuse should never be tolerated or passed off as "banter" or "part of growing up", as emphasised in KCSIE 2022. Child-on-child abuse can manifest itself in many ways including sexting (see above) and specific gender-related issues such as girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.



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Allegations of abuse by one or more pupils against another pupil, when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, are taken very seriously.

If such an allegation is made, the member of staff to whom the disclosure is made will immediately inform the DSL, who will inform the Head. The DSL will consult with the relevant Children's Social Care referral point and the Designated Safeguarding Director where appropriate.

Suspension of the pupil against whom the allegation has been made needs careful consideration and the Head will seek advice from the KRSCP before deciding on the course of action to be taken.

Pupils alleged to have sexually abused another pupil should be subject to a risk assessment for their continuing education on site, in consultation with the KRSCP.

All children involved, whether perpetrator or victim, should be treated as "at risk" in recognition of the fact that children who are abusers may be victims of abuse themselves and will require additional support from the school and possibly other agencies. KCSIE 2022 stresses that HSB ("harmful sexual behaviour") displayed by children can be an indicator of abuse. Support in school may include provision of an adult mentor from the staff and/or organisation of one-to-one counsellor from a trained professional.

### Supporting those involved and confidentiality

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

### Managing the situation and exit arrangements

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. **A referral to the DBS must be made, if the criteria are met.** If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school would not be complying with its legal duty to make the referral.

### Record keeping

Details of allegations that are found to have been malicious or unfounded should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The record should be retained until the person accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.



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For further details of the guidance in handling allegations against members of staff, refer to Part Four of Keeping Children Safe in Education (2022).

B. If the concern is that a child may be at risk from an adult who does not work at the school:

1. Report to the DSL without delay.
2. Log the incident on CPOMS.
3. Tell the informant (if appropriate) that you will be passing this information on to people who can help.
4. Don't make any promises. If the informant asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. You will have to tell someone.
5. An allegation may lead to a criminal investigation. Do not do anything that could jeopardise a police investigation, such as asking the young person leading questions or attempting to investigate the allegation of abuse. Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on the CP form, and ask them if they have told anyone else.
6. Keep all forms/evidence secure whilst being completed, including any notes you may have made in rough.
7. Pass all documentation to the DSL as soon as possible. The DSL will refer the case to Children's Social Care and, if appropriate, to the Police.

**Take no further action unless requested by the DSL.**

### Allegation against a child

If the concern is that a child may be at risk from another child (either at the school or from outside of the school)

1. Report to the DSL without delay.
2. Log this information on CPOMS.
3. Tell the informant (if appropriate) that you will be passing this information on to people who can help.
4. Don't make any promises. If the informant asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. You will have to tell someone.
5. An allegation may lead to a criminal investigation. Do not do anything that could jeopardise a police investigation, such as asking the young person leading questions or attempting to investigate the allegation of abuse.
6. Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on CPOMS, and ask them if they have told anyone else.
7. Keep all evidence secure whilst being completed, including any notes you may have made in rough.
8. Pass all documentation to the DSL as soon as possible. The DSL will refer the case to Children's Social Care and, if appropriate, to the Police.

**Take no further action unless requested by the DSL.**

### 2. Allegation/concerns that do not meet the harms threshold- referred to as 'low level concerns'

The term 'low level' does not mean these concerns are insignificant, it only means that the behaviour towards a child does not meet the threshold set out in paragraph 432 of KCSIE 2022.

Staff understand that a low-level concern is any concern- no matter how small, and even no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Kew Green School Staff Code of Conduct; and



## Safeguarding Children Policy and Procedures (Reception-Year 6)

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phones'
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or;
- humiliating children (an addition from KCSIE 2022).

Staff are empowered to share any low-level safeguarding concerns via the Low-Level concerns form. All staff have access to record on these forms and it can be done so anonymously.

This form is viewed by the Head. KGPS has a culture of openness, trust and transparency. The log of forms will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a pattern is identified, or if concerns move from low-level to meeting the harms threshold, the case will be referred to the LADO. Further information can be found in Part Four of KCSIE 2022.

**Whilst the Designated Safeguarding Lead will usually decide whether to make a referral, in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can refer their concerns to local authority children's social care directly (see section 8 below). If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead as soon as possible thereafter.**

If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

### 8. CONTACT DETAILS FOR KEY PERSONNEL AND AGENCIES

Designated Safeguarding Lead:	Susanna Gillett (KGPS) <a href="mailto:susanna.gillett@kgps.co.uk">susanna.gillett@kgps.co.uk</a> 02089485999 ext. 403
Deputy Designated Safeguarding Leader:	Amy Kinross (KGPS) <a href="mailto:amy.kinross@kgps.co.uk">amy.kinross@kgps.co.uk</a> 02089485999 ext. 414
Director with specific responsibility	Mr Theo Brehony (Kew House School) <a href="mailto:Theo.brehony@gardenerschools.com">Theo.brehony@gardenerschools.com</a> 020 8742 2038
Kingston & Richmond KRSCP	07834 386459
K & R Children's Social Care	020 8547 5008 (SPA)
Kingston Council	020 8547 5000
Richmond Council	020 8891 1411



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Kingston & Richmond LADO

020 8547 4609 & 07774 332675

[DBS referral](#)

[Teaching Regulation Agency referral](#)

DfE helpline for non-emergency advice 020 7340 7264

DfE email address for non-emergency advice [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

Police (non-emergency) 101

Police (emergency) 999

### **11. Supporting children, promoting awareness and prevention**

We recognise that a child who is abused or witnesses violence may feel helpless, ashamed and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We support all our pupils by encouraging self-esteem and self-assertiveness, through the curriculum as well as their relationships, whilst not condoning aggression or bullying. We promote a caring, safe and positive environment and liaise with a range of support services and agencies involved in safeguarding children.

We have a strong pastoral framework at KGPS which is designed to foster the spiritual, cultural, moral and social development of all our pupils and encourages children to discuss any difficulties they may be experiencing with a member of staff. During circle time and present in other planned times and events, discussions and activities take place focusing on a wide range of pastoral and PSHEE issues. Throughout the school day and across the curriculum, pupils learn about how to adjust their behaviours to reduce risk, whether this be physical or emotional, and in addition to this children learn about the risks of using technology and the internet. Children also learn about appropriate social behaviour and how to treat others with respect.

We hope that by establishing and maintaining an ethos and environment where children feel secure, able to talk to their teachers and by equipping them with the tools they need to stay safe, we will go some way in preventing children coming to harm. We include within this our attitude and encouragement to teaching the children about British values.

#### How we listen to children

It may be that you have concerns about a child through your own observations or it may be a situation where a child comes to you as a 'friendly adult' to which they can talk. In either situation, it is vital that the child feels able to speak freely. To try and encourage the 'right atmosphere' it will help to consider the following:

- Establish a rapport with the child
- This may well have already taken place if the child has come to you, but in the situation where you are approaching the child, it will help them if you can try and put them at their ease as much as possible.
- Find a time and place where there will be no interruptions.
- Let them know this will be a friendly enquiry rather than an investigation.
- You must be non-judgemental, whatever you are told.
- Reassure the child that they have done the right thing.
- Focus on listening to the child rather than asking questions: allow periods of silence for the child to collect their thoughts.



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- Your body language should be non-threatening. Use a relaxed but concerned pose and expression. AVOID PHYSICAL CONTACT UNLESS YOU ASK PERMISSION OF THE CHILD.
- Do not promise confidentiality, or to keep secrets. Instead, explain that you will need to pass this information on to someone who has been trained to help.
- Keep notes of what the child tells you and pass this on to the DSL at the earliest possible opportunity.

### 12. What happens next?

On receiving the concerns with relation to children in need of help or who are the focus of concern, the DSL will:

- clarify the issues with the member(s) of staff raising the concerns
- provide the Head with a full briefing of the situation
- contact Social Services for advice or referral within 24 hours: Contact Richmond Council by phoning: Single Point of Access (SPA) team on 020 8547 5008 [spa@richmond.gov.uk](mailto:spa@richmond.gov.uk)
- they may be put in contact with the LADO – Local Authority Designated Officer
- outside of office hours, weekends and public holidays the Emergency Duty team should be contacted by phoning 020 8770 5000. Any serious concern about a child's immediate safety the DSL will contact the police on 999.
- Informal advice may also be sought from KRSCP on 07834 386459. School may refer to the local authority for guidance on thresholds and borderline cases.

Having received information about your concerns/referral, the local authority Children's Social Care (CSC) team will decide within 24 hours what further action should be taken and inform the school of their decision. If the referral has not been acknowledged within 48 hours it is the responsibility of the DSL to follow up the referral.

CSC, within the framework for the Assessment of Children in Need will make an initial assessment, is this a Child in Need, or a Child in Need of Protection and dependant on the seriousness of the situation this may involve the Police. The purpose of the consultation with the police is to discuss details of the referral and make a joint decision about what needs to be done and how quickly.

Remember that the protection of children from abuse must have first priority and even if your cause for concern or those of someone else proves to be unfounded, your action is justifiable if based on concern for the child's safety. Remember that once you have reported your concerns the decision about what further action, if any, should be taken is the responsibility of the local authority CSC team.

### 13. Keeping Records – Confidentiality

Information about safeguarding concerns in relation to a child is confidential. The DSL will ensure that any written information is kept in a locked filing cabinet and that conversations about the safeguarding concerns are kept to a 'need to know' basis. CPOMS records are only shared with appropriate staff. **NO RECORDS SHOULD BE KEPT ON THE SCHOOL SHAREPOINT.**

The sharing of information between agencies should be done in accordance with any protocols in existence in relation to the Data Protection Act 1999.

However, the law permits the disclosure of confidential information necessary to safeguard a child or children in the public interest; that is, the public interest in child protection may override the public interest in maintaining



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confidentiality. Disclosure should be justifiable in each case, according to the particular facts of the case and legal advice should be sought in cases of doubt.

### **14. Physical contact with children in school**

Many adults will be involved with pupils during the course of the school year. These will include the full and part time teaching staff, peripatetic teachers, school teaching assistants, administrative and maintenance staff (including secretaries, cleaners, caretakers etc.), volunteers (parent readers etc.), governors, invited guests and speakers.

It is important that such adults recognise they can be in a vulnerable position with regard to their relationship with the children. To safeguard the welfare of staff and volunteers and to avoid misunderstandings, we encourage staff to behave as follows:

- Physical Contact - there may be occasions where a distressed pupil needs comfort and reassurance which may include physical comforting such as a caring parent would give. Examples of this would include when children are injured or unwell, missing a parent, upset about an incident in the classroom or playground, etc. It is perfectly normal for a child to receive a cuddle, an affectionate arm around them or to sit on an adult's lap at these times. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact, particularly with the same pupil over a period of time. Where a member of staff has particular concern about the need to provide this type of care and reassurance they should seek the advice of the Head of Section.
- Young children can also thrive from some form of physical contact when they receive praise and encouragement. This is in the form of a cuddle, an affective arm or pat on the back that is carried out in the manner of a caring parent. These gestures should not be excessive or exclusive.
- It may also be necessary to have physical contact with a child who is reluctant to separate from their parent. This is always done with the permission of the parent and done in such a way to separate their child from their parent without causing physical injury. Where a member of staff has particular concern about the need to provide this type of support for a child regularly they should seek the advice of the Head of Section.
- Corporal punishment is prohibited and its use would lead to immediate disciplinary action.
- Where physical restraint is needed, use no more force than is necessary. (Under subsection 548(5) of the Education Act 1996, teachers may use physical intervention to avert 'an immediate danger or personal injury, or an immediate danger to the property of, or a person (including the child him/herself)'. Teachers' powers under section 4 of the 1997 Act to restrain pupils from engaging in certain activities remain in force. Where an employee has taken action to physically restrain a pupil they should make a written report of the incident to the Head of Section, who will in turn inform the parents of what action was taken and why. (See appendix for 'A Physical Restraint Record Form')
- Avoid being alone with a child in a secluded place. Should a child need to be spoken to in confidence, a room with a windowed door should be used and a colleague informed of the intended interview. (Parent volunteers must not be placed in a position where they are alone with a child; they should always be in a public area of the school).
- Always avoid being alone with a child changing for sports or a different activity.
- Avoid becoming personally involved with children and their families on extra-curricular activities. This could lead to accusations of favouritism or undue pressure being applied by the family.
- Document uncomfortable situations that may be misinterpreted (e.g. letters of 'adoration' from pupil to teacher, inappropriate conversations) on CPOMS and inform the DSL.
- Always share concerns about children on roll. DO NOT KEEP SECRETS. Again, inform the DSL and enter details of concern on CPOMS.
- Transporting children in staff cars is not advised under any circumstances



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- Children should not be given personal information about staff including mobile phone numbers
- Discourage the use of nicknames and teachers' first names
- Cyber communication – it is inadvisable to directly email and text message between staff and pupils. If it is unavoidable, cc the parents and a member of the Senior Leadership Team
- Gifts should be given fairly and equally, without preference
- Avoid speaking critically to children about other members of staff
- Always maintain a professional manner. Avoid teasing, favouritism and losing one's temper.

### **15. The Public Interest Disclosure Act 1998 (Whistle blowing procedures)**

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of the SLT or relevant agencies. Although it can be difficult, this is important where the welfare of children may be at risk. You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings are natural, but they must never result in a child continuing to be unnecessarily at risk. Remember, it is often the most vulnerable children who are targeted and they need someone like you to safeguard their welfare.

In terms of children's welfare and safeguarding, all staff have a responsibility to provide a safe environment in which children can learn. All teachers share responsibility for safeguarding children's wellbeing and maintaining public trust in the teaching profession as part of their professional duties. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime.

If a member of staff has reason to suspect that one or more of the following has taken place, then he/she should feel able to raise the concern with the Head:

Inappropriate or harmful conduct towards a child (or children), including but not confined to:

- Bullying, humiliation, or any other kind of abuse;
- Contravening health and safety guidelines in place to protect children;
- Serious breaches of the school's Code of Conduct;
- Professional practice that falls short of normally accepted standards;
- Compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention; or
- They have concealed or are attempting to conceal any of the above.

The school will fully support staff and do all it can to protect them from any adverse repercussions that may arise from whistle blowing. 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.

The NSPCC Whistleblowing Helpline is available to staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **16. Appointing staff**

Kew Green School operates a safe recruitment procedure, as set out below, as specified in our Safe Recruitment Policy in line with the Independent School Standards Regulations (March 2014) and KCSIE (September 2022). The school takes all possible steps to ensure that anybody who will be working at Kew Green School (either paid or as a regular volunteer) is thoroughly checked both to prevent unsuitable people from gaining access to children and to maintain the integrity of the



## Safeguarding Children Policy and Procedures (Reception-Year 6)

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teaching profession. To ensure safer, stringent staff recruitment, Kew Green School will action the following before a candidate takes up a position:

- **Disclosure and Barring Service (DBS)** Referrals are made to check on suitability for work as documented in our Safe Recruitment Policy
- **Identity** – proof of identity should be supplied in the form of a passport or similar official documentation with picture.
- **Academic Qualifications** – verification of qualifications should be done by looking at relevant certificates or diplomas, or a letter of confirmation from the awarding institution. If original documents are not available, a properly certified copy must be produced.
- **Professional and Character References** – these should always be taken up and directly with the referee. It is not good practice to rely solely on testimonials provided by the candidate or on employers who are not the most recent or current.
- **Previous Employment History** – Always obtain satisfactory explanation for gaps in employment history. If a candidate for a teaching post is not currently employed as a teacher, a check with the school at which they were most recently employed should confirm details of their employment and their reasons for leaving.
- **Overseas check** - If employment history is from overseas, a relevant report needs to be obtained from the appropriate authorities of that country in order to satisfy our knowledge that the potential employee has met all suitable child protection procedures in that country.
- **DBS checks**- The DBS is responsible for deciding whether an individual should be barred from working with children and vulnerable adults and for maintaining a list of those individuals who are determined to be unsuitable (the barred list). The DBS will consider cases that concern safeguarding matters (i.e. harm or the risk of harm to a child), barring individuals from working with children where appropriate. More detail about the role of the DBS can be found at Gov.uk.

Portability of an individual's DBS came into force on 17<sup>th</sup> June 2013. This means that any individual who has had a DBS check on or after this date can subscribe to the Update Service for a nominal amount per year which allows them to take it with them from role to role within the same workforce. Each employer will then, with their permission, look at their current DBS Certificate to check it is the same level and type and do an online Status Check.

- **Prohibition check** - A prohibition order means that the person concerned is not allowed to undertake unsupervised teaching work in schools. Where an individual is prohibited, their details will appear on the Prohibited List. The Prohibited List is administered by the NCTL and can be accessed by current and prospective employers of school staff via the Employer Access Online System. This service also provides information about any teacher qualification held and whether induction has been passed. The service is offered free of charge to schools, local authorities and teacher supply agencies in England.

A prohibition order is likely to be appropriate when the behaviour of the person concerned has been fundamentally incompatible with being a teacher. The primary purpose of a prohibition order is to protect pupils. A prohibition order is a lifetime ban, though in some circumstances the teacher may be able to make a request to have it reviewed after a specified period of time.



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For those members of staff taking on management and leadership positions of the level of Head of Department or higher, a prohibition from management check needs to be performed (from September 2015). This is done as part of the DBS check.

- **Barred List** –can be used to confirm if an individual is or is not barred from working with Children. DBS check of a person’s suitability to work with children will contain details of whether they are included on the Barred List Check.
- **Right to work in the UK** – proof is obtained that the candidate is eligible to work in the UK.
- **Health** – Anyone appointed to a post involving regular contact with children should be medically (physically and mentally) fit. Staff will be asked to sign a declaration to confirm they are medically fit to work with children at the time of appointment. Staff must inform their Head of Section if they are taking medication which may affect their ability to care for children and any staff medication must be securely stored at all times.
- **Disqualification by Association-** Under the Childcare Act 2006, schools cannot employ anyone in early years and relevant later years’ provision who is disqualified from working with children under the Regulations, Childcare (Disqualification regulations 2009).

The Department for Education (DfE) guidance about what the Regulations mean for schools has statutory force and so schools are required to comply with it. In order for the schools to demonstrate compliance with the regulation, the Company requires staff to complete and sign the Staff Suitability Self-Declaration form when a candidate has been shortlisted for a position (prior to DBS being received) in order for this to be discussed and considered at interview, and this is recorded on our central register.

All members of staff have a duty to inform the Head if their home circumstances change that potentially makes them subject to disqualification by association.

- **Safe Recruitment** – as from April 2006, at least one member of the interview panel should have Safe Recruitment training. KCSIE 2022 guidance states that an online search should be considered prior to shortlisting. Appropriate child protection checks and procedures also apply to any staff employed by another organisation and working with the school’s pupils on another site (for example when on residential trips). For further details please refer to the school’s Safe Recruitment Policy.

The Deputy Head will ensure supply teachers complete the ‘Supply Safeguarding Induction Pack’ which involves their providing proof of ID, their reading and signing agreement to abide by Kew Green School’s Safeguarding Policy and Professional Code of Conduct for Staff, as well as providing evidence of current and appropriate DBS checks .

A central register of recruitment and vetting checks is kept for all members of staff, (including volunteers and others brought into the school such as supply staff) by the school office. All staff (including temporary and voluntary) will be provided with the Safeguarding Policy and the Code of Conduct on induction.

The school will promptly report to the Disclosures and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child or because he or she is considered unsuitable to work with children. In this context, ceasing to use a person’s services includes:

- dismissal
- non-renewal of a fixed-term contract
- no longer engaging/refusing to engage a supply teacher provided by an employment agency
- terminating the placement of a student teacher or other trainee
- no longer using staff employed by contractors or volunteers
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- resignation
- voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the Department for Education's register. The school will also make a referral to the [Teaching Regulation Agency \(TRA\)](#) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are:

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

Further guidance is published [here](#).

### **17. Use of Mobile Phones and Social Media**

Guidance for all staff is written in our 'Mobile Phone and Camera Acceptable Use Policy' as well as our online-safety documents.

Children have their photographs taken to provide evidence of their achievements for development records as well as displays and promotional media such as our in-house magazine (Kew Life) or our website. Under the Data Protection Act 1998, before any child joins the school, we obtain parental permission to take photographs or to film them.

- This permission covers the use of the photographs of the children taking part in an activity to advertise/promote the school.
- Staff mobile phones should be turned off or on silent during working hours. Staff are strictly prohibited from making personal calls during their teaching time.
- Staff are advised to keep contact with children on a professional basis and to be prepared for their mobile devices to be open to scrutiny upon request from the Head.

Social media:

Staff are forbidden to use social media for purposes of contact with any child.

Staff are required to keep a 'professional distance' from the parent body in this respect and are strongly advised NOT to enter social media exchanges with any parents.

Staff are reminded that Social Media security settings of their own accounts should be considered to prevent 'browsing' parents and/or children scrutinising their online activity.

### **18. Related Policies and Documents:**

- Staff Handbook
- Staff Code of Conduct
- Health and Safety Policy
- Anti-Bullying Policy



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- Online Safety Policy
- Low Level Concerns Policy
- Looked After Child Policy
- Induction Policy
- Supervision of Pupils Policy
- Procedure for a Missing Child Policy
- Attendance & Children Missing from Education Policy
- PSHEE Policy
- Behaviour, Rewards and Sanctions Policy
- Safe Recruitment Procedures

### **19. Review**

This policy and its procedures are reviewed annually by the DSL with the Head, and the Director with responsibility for Safeguarding.

Last review date: June 2015

Last review date: Sept 2016

Last review date: Oct 2017

Last review date: January 2019

Last review date: July 2020 in light of coronavirus

Last review date: Sept 2020

Last review date: Sept 2021

Last review date: Sept 2022



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### KGPS Safeguarding Appendices:

1. [Safeguarding Agreement](#)
2. [Safeguarding Action Flowchart](#)
3. [DBS Check Flowchart](#)
4. [KGPS Recording of Safeguarding and Welfare Concerns \(CPOMS\)](#)
5. [Physical Restraint Recording Form](#)

#### **1. Safeguarding Agreement**

Please read the attached copy of our Safeguarding Policy as well as Part 1 of Keeping Children Safe in Education (DfE Sept 2022) and sign agreement to the guidelines below to ensure consistency of behaviour toward children in our school:

- Do not have undue physical contact with a child. Should a child be hurt or in distress use 'common sense' in your physical contact. Be sympathetic and caring but do not invite or have unnecessary or prolonged physical contact.
- On no account shall corporal punishment be used.
- Never at any time have 'secrets' with a child. If preparing a mother's day card, for example, tell the child it is a surprise for mummy, not a 'secret' to be kept between you.
- If a child needs to be undressed in the case of an 'accident' or an injury requiring further inspection, the child should be encouraged to undress them self, if possible in privacy. Do not stay with an undressed child, alone in a closed room; leave the door open or ajar and stand with your back to the child while they are changing, if possible asking another adult to assist so you are not alone.
- If possible please use a school camera rather than a personal mobile device. If you use your personal mobile to take photographs it will need to be open to scrutiny from the Head.
- On no account should private contact be made with a child via, for example email, letter or phone without the parent's knowledge and consent. If it is unavoidable, please cc the parents and a member of SLT.
- If you are concerned at any time about a child for whatever reason, or the behaviour of a member of staff, tell the DSL immediately. You are not expected to make any judgements, but it is your responsibility to alert the DSL of any concerns you may have.

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#### **Safeguarding Agreement**

I \_\_\_\_\_ in my capacity as \_\_\_\_\_

have read and understood the Safeguarding Policy and agree to follow the above guidelines at Kew Green Preparatory School.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Please return completed slip to the school secretary, thank you.

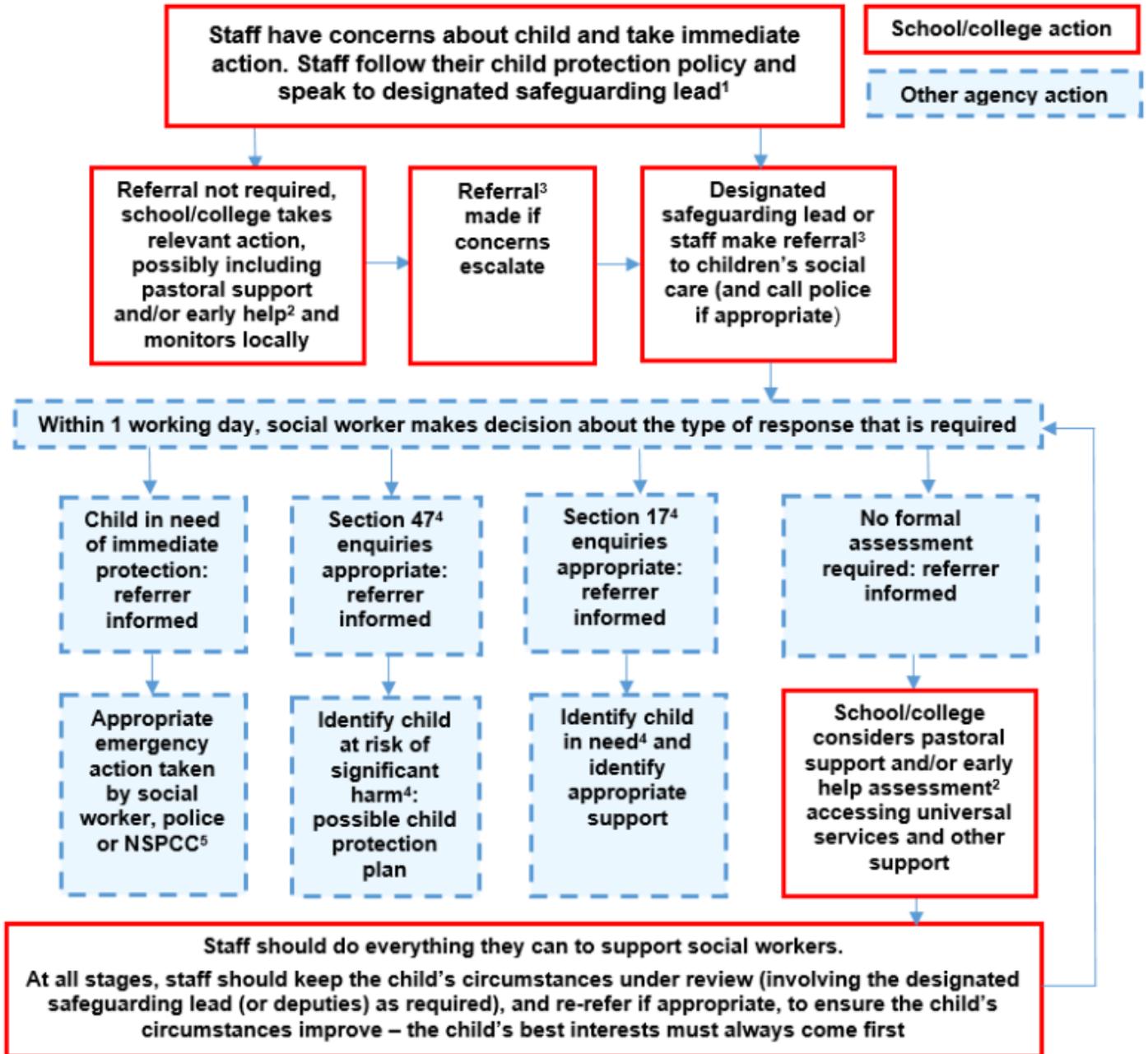


Safeguarding Children Policy and Procedures (Reception-Year 6)

2. Safeguarding Action Flowchart

Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral.



\*paragraphs refer to KCSIE (2022)



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<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of the full version of KCSIE.

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

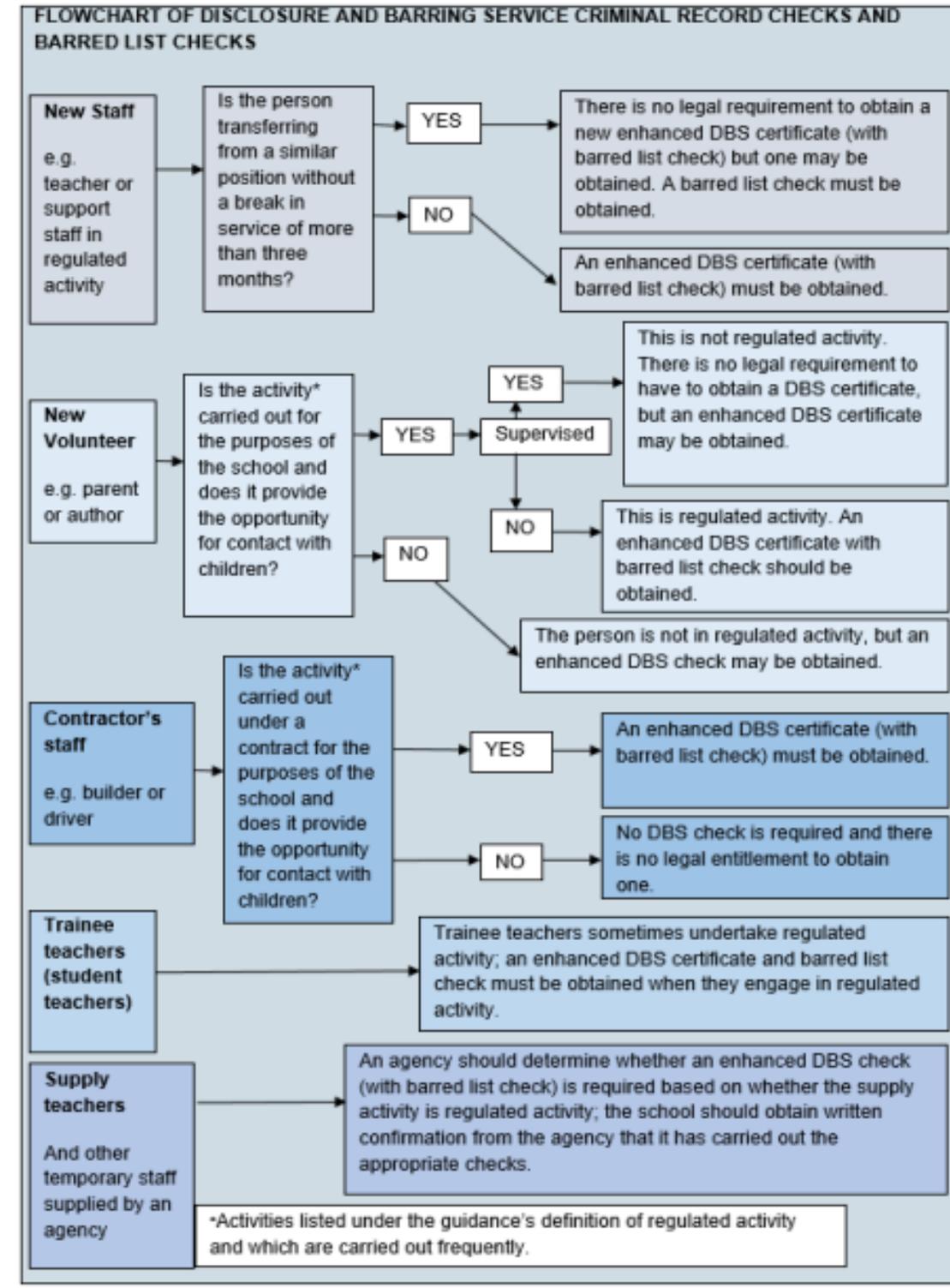
<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

<sup>4</sup> 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.

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



3. Flowchart of DBS and Barred List Checks



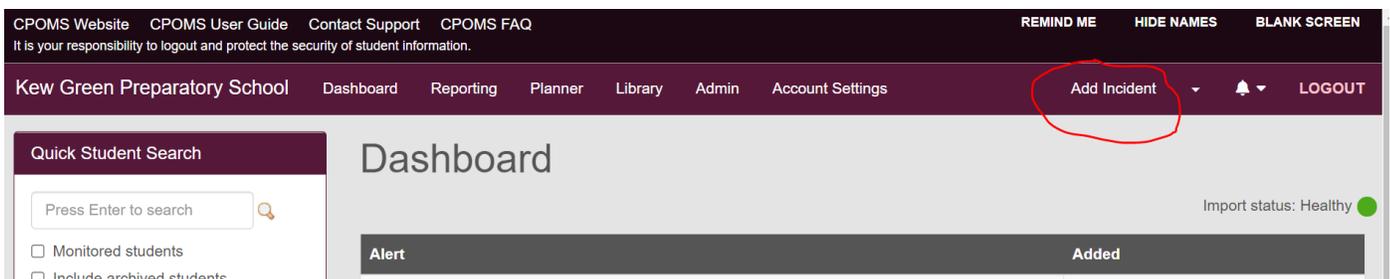


## Safeguarding Children Policy and Procedures (Reception-Year 6)

### 4. KGPS Recording of Safeguarding and Welfare Concerns

At Kew Green, we use the online software CPOMS for recording all safeguarding, welfare and pastoral issues. It is a secure system that allows us to build a rounded picture of each pupil and track any trends or issues with concerns throughout their time at the school. All staff are given a secure login and trained how to record any concerns as part of their induction process. The DSL and DDSL are always available to assist staff with recording concerns when necessary.

To report an observation, incident or safeguarding concern, staff need to login to CPOMS, and click on the 'Add Incident' tab at the top of the dashboard. Selecting the correct category ensures that the appropriate people are notified, and access to the record is restricted appropriately.





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5. Physical Restraint Recording Form

Name of Pupil..... Class .....

A description of the build-up to the event including the reason why restraint was used (e.g. to prevent injury to others, self-injury, damaging property, or an attempt to leave the premises) and also including details of any adult witnesses (if applicable)

Describe how you went about restraining the child

Name of member of staff.....

Staff signature.....Date.....

Witness signature (if applicable) ..... Date.....

Head of Section's signature.....Date.....

Parent's signature .....Date.....