



SAFEGUARDING AND CHILD PROTECTION POLICY

This Policy applies to all year groups at Thomas's Schools, including the EYFS. Thomas's operates as a group of schools with a similar ethos and values. All safeguarding procedures follow statutory guidance and are consistent across the group. There are designated safeguarding personnel in each of the schools, all of whom liaise closely with the local authority and other external agencies. Key contact details for each school can be found via the links below.

This policy should be read in conjunction with the Anti-Bullying Policy, Attendance Policy, Behaviour Policy, Code of Conduct, Complaints Policy, Confidentiality Policy, COVID-19 Policy, Intimate Care Policy, ICT Acceptable Use Policy, Medical Conditions and Medication Policy, Online Safety Policy, Whistleblowing Policy

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SCHOOL SUPPLEMENTS – KEY PERSONNEL AND CONTACT DETAILS

[Thomas's Battersea Safeguarding and Child Protection Key Personnel and Contact Details](#)
[Thomas's Clapham Safeguarding and Child Protection Key Personnel and Contact Details](#)
[Thomas's Fulham Safeguarding and Child Protection Key Personnel and Contact Details](#)
[Thomas's Kensington Safeguarding and Child Protection Key Personnel and Contact Details](#)

1. INTRODUCTION

Safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. Safeguarding means:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as in need and/or suffering or likely to suffer significant harm. This document includes child protection procedures which detail how to respond to concerns about a child.

“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 their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.” (Keeping children safe in education (KCSIE) Jan 2021).

Thomas’s fully recognises its moral and statutory responsibilities for child protection and is aware that the safeguarding and promotion of the welfare of children is of paramount importance. The School endeavours to provide a safe and welcoming environment where children are respected and valued. We are alert to signs of all forms of abuse and neglect, including the use of technology to abuse or exploit children, and follow procedures to ensure that children receive effective support and protection.

This policy applies to proprietors, staff, parents, volunteers, contractors and visitors to the School. It applies to all pupils, including those in the EYFS, on and off the school site whilst they are the responsibility of the School. Whenever the term ‘staff’ is used within this policy, it applies to all categories of staff, including supply and self-employed staff, contractors, volunteers, students and those on work experience.

It should be noted that the term “children” includes everyone under the age of 18.

2. PRINCIPLES

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment and to create an open environment where staff and pupils feel able to raise concerns, where concerns will be listened to and where support services and other agencies are readily involved. Our aims are:

- to ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- to acknowledge that all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection; to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they have any concerns;
- to practise safer recruitment and ensure that all staff are recruited in accordance with the School’s Recruitment Policy and KCSIE;
- to equip children with the skills needed to keep them safe, including the safe use of electronic equipment and access to the Internet;
- to establish a safe environment in which children can learn and develop, including online;
- to support children in recognising when they are at risk and how to get help when they need it;
- to provide early help to pupils and families;
- to develop and implement procedures for identifying and reporting cases, or suspected cases, of harm or neglect;

- to support those children who have suffered harm or neglect;
- to identify, monitor and support those pupils who may be in need of additional support from other agencies apart from Children's Services, e.g. Child and Adolescent Mental Health Services (CAMHS);
- to ensure that children on the school register, of compulsory school age do not miss out on parts of their education through continuous absenteeism;
- to work with other agencies, where such work is needed, to ensure adequate arrangements to identify, assess and support those children who are in need and/or suffering significant harm or may suffer significant harm without appropriate intervention;
- to raise the awareness of all staff of the need to safeguard children and of their responsibilities to report **all concerns**, including those which may appear minor. This will include concerns about suspected abuse, including domestic violence, radicalisation, child sexual exploitation, sexting, peer on peer abuse, sexual violence and sexual harassment and online grooming and abuse.

We recognise that teachers are well placed to observe signs of abuse or neglect. The School will create a positive ethos amongst the staff so that we can:

- establish and maintain an environment where children feel secure, are encouraged to talk and are listened to;
- ensure children know that there are adults in the school whom they can approach if they are worried;
- include opportunities in the PSHCE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

Each School follows the procedures set out by their local Borough Safeguarding Children Partnership (details in School Supplements) in order to:

- ensure that there is a Designated Safeguarding Lead (DSL) for child protection who has received appropriate training and support for the role and is able to act independently of the Principals;
- ensure that every member of staff and volunteer knows the name of the Designated Safeguarding Lead (DSL) and their deputy/ies and their role;
- ensure that every member of staff and volunteer is trained and understands their responsibilities in being alert to signs of abuse and responsibility for referring any concerns whatsoever to the DSL;
- ensure that all members of staff are fully aware of the need to report any concerns about the actions of staff members, volunteers or other adults;
- develop links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences;
- keep written records of concerns about children, whether or not there is a need to refer the matter to Children's Services or any other agency;
- ensure all written records are kept securely, separate from the main pupil file, and in a locked location;
- develop and follow procedures where an allegation is made against a member of staff or volunteer;
- ensure safe recruitment practices are always followed;
- ensure that parents have an understanding of the responsibility placed on the school and staff for child protection;
- ensure that pupils who have been abused are supported appropriately;
- ensure that the child welfare office of the Local Authority is informed of any unexplained absence of two days for pupils on the CP register and ten consecutive days for others;

- ensure that the Local Authority is informed about any child whose name is added to or deleted from the admission register at a non-standard transition point;
- ensure safeguarding records are requested from previous schools/nurseries for any new pupils joining the school;
- ensure that safeguarding information is securely passed to future schools separately from the main file when pupils leave the school;
- ensure that staff working with Early Years, Reception and Year 1 pupils or at before and after school clubs attended by children under eight years of age are aware of the requirement to confirm that they are not disqualified from working in those settings;
- ensure staff are aware of the relevant legislation relating to Disqualification and that they must advise the head teacher if they are concerned that they may be disqualified.

3. ROLES AND RESPONSIBILITIES

KEY PERSONNEL AND CONTACT DETAILS FOR SAFEGUARDING AT THOMAS'S

This policy applies to all the schools within Thomas's London Day Schools and the procedures followed are appropriate and consistent for all pupils. Key Personnel and contact details for each individual school can be found in the School Supplements at the beginning of this policy.

3.1 The role of all members of staff

- To read and understand, Part 1 of Keeping Children Safe in Education, for those staff who work directly with children this will include Annex A of the main document.
- To read and understand the School's Safeguarding & Child Protection Policy and Procedures i.e. this document.
- To understand their obligations under the statutory guidance.
- To undertake regular safeguarding training, at least annually.
- To know the identity of the DSL and Deputy/ies.
- To provide a safe environment in which children can learn.
- To be aware of the signs of abuse and neglect including abuse due to religious or cultural beliefs such as female genital mutilation (FGM) and peer on peer abuse so they are able to identify children who may be in need of extra help or who are suffering or likely to suffer, significant harm and in such circumstances to take appropriate action.
- To report to the DSL any concerns whatsoever, however minor they may appear.
- To help pupils understand how to keep themselves safe and manage risk through PSHCE discussions and through all aspects of school life.
- To foster a culture of trust between adults who work at the school and children who attend it.
- To identify children at risk of being drawn into terrorism and to challenge extremist ideas which can be used to legitimize terrorism and are shared by terrorist groups.
- To build pupils' resilience to radicalisation by actively promoting fundamental British values and enabling them to challenge extremist views.
- To be alert to persistent absenteeism of any pupils and inform the DSL of any concerns with regards to safeguarding.
- To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).
- To inform the DSL when they become aware of any private fostering arrangements

- To be open, accepting and ready to listen to a pupil and to follow the procedures outlined in this policy in the event of a disclosure.
- To set a good example by conducting themselves appropriately and maintaining suitable standards of conversation and interaction with and between pupils.
- To be aware of the implications on safeguarding of any 'relationships and associations' that staff have in school and outside (including online) and to speak to the DSL if they have any concerns.
- Members of staff are required to 'self-declare' if there are any changes to their own criminal record or if there is a change in their personal circumstances which may affect the 'disqualification' criteria as listed in the DfE Disqualification under the Childcare Act 2006 statutory guidance of February 2015. They are also encouraged to sign up for the DBS update service to enable future status checks to be made.

3.2 The role of the Designated Safeguarding Lead

The Designated Safeguarding Lead is a member of the Senior Leadership Team and has ultimate lead responsibility for all child protection matters in the school. The DSL the person to whom anyone working in the school is required to report any concerns or suspected neglect or abuse.

Their responsibilities include:

- acting as source of support and expertise for staff on matters of safety and safeguarding;
- ensuring that the school's relevant policies are known and used appropriately;
- raising awareness and discussion of safeguarding issues and concerns amongst staff and pupils;
- co-ordinating safeguarding planning and action within the school and liaising with other agencies.

A detailed breakdown of the responsibilities of the DSL can be found in **Appendix 5** of this policy.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

The Deputy Designated Lead(s) are trained to the same level as the Lead and in the absence of the DSL, carry out those functions necessary to the ongoing safety and protection of pupils.

During term time, the DSL or their deputy(ies) will be available during normal school hours, either in school, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns. During the holidays there is no guarantee of immediate availability but most DSLs would be accessing emails fairly regularly.

3.3 The role of the Head

- To ensure that the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- To have read and understood Parts 1, 2, 3, 4 and 5 of Keeping children safe in education.
- To allocate sufficient time, training and resources to enable the DSL and deputy to carry out their roles effectively.

- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- To ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding children;
- To create a safe environment and a caring ethos within the school;
- To ensure that pupils' safety and welfare is addressed through the curriculum and related policies (Anti-bullying, Behaviour, Equal Opportunities, Online Safety, PSHCE).
- To be aware of any off roll notification should there be safeguarding concerns and to follow this up in conjunction with the DSL.
- To be aware of the possibility of private fostering arrangements and ensure that Registrars take steps to verify the relationships of the adults to any child who is being registered at the school.
- To make parents aware of the School's Safeguarding Children Policy on a regular basis (usually in the Bulletin at the start of each term).
- To receive required training to understand safer recruitment processes and ensure that Safeguarding awareness is covered in every interview to recruit new staff with at least one member of each interview panel having undergone Safer Recruitment training.
- To monitor the effectiveness of the policy and procedures and liaise with the Vice Principal over amendments.

3.4 The role of the Principals

- To ensure that all staff in their school read at least Part 1 of Keeping children safe in education, including Annex A for those staff who work directly with children.
- To ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of Keeping Children Safe in Education.
- To ensure compliance with statutory safeguarding and child protection requirements.
- To ensure there is an effective and compliant Safeguarding and Child Protection Policy in place, which is also consistent with the requirements of the Local Safeguarding Partners.
- To ensure that the Safeguarding Policy is reviewed at least annually and that this review includes the effectiveness of procedures and their implementation and ensures that the school contributes to inter-agency working in line with *Working Together 2018*, through effective communication and co-operation with local agencies.
- To ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- To ensure there is a comprehensive and effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.
- To ensure that the procedures are in place for the school's information systems to have at least two emergency contact numbers for each child in case of emergencies and in case there are welfare concerns at home.
- To ensure that safer recruitment procedures are followed and that all appropriate checks are carried out on all staff, including those working in a management role as well as those with QTS, before starting their employment.

- To ensure that each school has a Designated Safeguarding Lead who is a member of the Senior Leadership Team, is sufficiently independent of the Principals and has undergone regular inter-agency training at least every two years.
- To provide sufficient resources to enable appropriate training to be given to the Head, the DSL and other staff at regular intervals, including annual safeguarding updates.
- To ensure that the school has procedures for dealing with allegations of abuse against members of staff that comply with the Local Safeguarding Partners.
- To utilise the experiences and expertise of staff when shaping safeguarding policies and give opportunities for staff members to contribute and shape safeguarding arrangements and child protection procedures.
- To ensure IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking which may place unreasonable restrictions on what children can be taught.
- To have policies and procedures in place about children accessing the internet on their phones while in school. (See Online Safety Policy).
- To have policies and procedures in place relating to the use of technology within the EYFS.

4. SAFEGUARDING PRACTICES

4.1 Safer Recruitment

The school is committed to safer recruitment and it follows the requirements for the safer recruitment and employment of staff in KCSIE and Disqualification under the Childcare Act 2006 (DfE September 2018). The ultimate responsibility for which lies with the Principals. The Heads and the school's HR department are responsible for implementing these procedures in practice.

All staff are checked to ensure their suitability for their proposed role. Checks include:

- references;
- verification of identity;
- where appropriate, verification of qualifications;
- a medical fitness declaration;
- verification of right to work in the UK;
- overseas police checks (where applicable);
- an enhanced check with the Disclosure and Barring Service (DBS);
- a self-declaration to ensure compliance with regulations made under the Childcare Act 2006;
- a check that there is no teacher prohibition order by the (TRA) or any restrictions imposed by an authority;
 - S128 checks are carried out on all Principals, Heads, Senior Leaders and Heads of Department. If someone has been prohibited from the management of schools this will appear on their DBS certificate.

All checks are recorded in the School's Single Central Register of Appointments. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in school, in line with the discontinuation of the EEA member states list.

Contractors

- Building contractors who work on the school site will be made aware of this policy.

- Long-term contractors who work in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the SLT deem this to be appropriate.
- During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors and their employees to have direct access to pupils in non-teaching times.

Volunteers

- Risk assessments are carried out on all volunteers helping in schools to decide whether a DBS check is needed or not.
- Any volunteer who is deemed to be in regulated activity will be required to undergo an enhanced DBS.
- All parent readers and volunteers helping in schools on an unsupervised basis will therefore require an enhanced DBS check as well any volunteer who assists with activities involving personal care, eg helping young children get changed for swimming or PE.
- Parents volunteering to host overseas children on exchanges are required to have enhanced DBS checks. This requirement also applies to anyone living in the house where the exchange pupil is to stay.

Extended school and off-site arrangements

- Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and Procedures apply.
- If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.
- When our pupils attend off-site activities, including day and residential trips and work related activities, we will check that effective safeguarding arrangements are in place. For sessions offered by alternative providers we will ask for written confirmation from that provider that all safeguarding vetting and barring checks have been carried out on their staff.
- All staff are bound by our Educational Visits and Off Site Activities (EVOSA) Policy when arranging and organising off-site trips.

Induction

Before starting at Thomas's all new members of staff are required to sign to confirm they have read, understood and agree to comply with the requirements outlined in:

- Thomas's Safeguarding and Child Protection Policy and Procedures;
- Part 1 of Keeping children safe in education, including annex A for those staff who work directly with children;
- Thomas's Disclosure of Disqualification under the Childcare Act briefing paper (amended September 2018);
- Thomas's Staff Code of Conduct.

4.2 Training

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

- All newly recruited staff (teaching and non-teaching and including visiting peripatetic members of staff and external club leaders) are given in-house training on safeguarding issues as part of their induction which includes:

- Keeping children safe in education including Annex A for those staff who work directly with children;
 - This Safeguarding and Child Protection Policy and Procedures;
 - Thomas's Staff Code of Conduct;
 - Thomas's Online Safety Policy;
 - Thomas's Whistleblowing Policy;
 - Thomas's Behaviour Policy;
 - The identity and the role of the DSLs and Deputies;
 - Prevent online training;
 - Procedures on managing children who are missing education (in Attendance Policy).
- The DSLs and deputies undertake inter-agency training every two years and take part in annual updates of specific safeguarding matters are required. They are encouraged to attend network meetings and external courses.
 - Members of staff are given regular updates (at least annually) on Safeguarding issues, including advice on protecting children from radicalisation and online safety.
 - Full refresher courses are organised to ensure that everyone is re-trained every three years.
 - All members of staff have access to the online safeguarding training programme "Educare" and are required to complete courses regularly in response to changes in legislation or to update their safeguarding knowledge.
 - Training is provided about the duty to 'prevent terrorism', using the 4 main themes from The Prevent Duty – Risk Assessment, Working in Partnership, Staff Training, IT Policies.
 - At least one person in each recruitment process has had "Safer Recruitment" training
 - A record is kept of staff training, including type of training and dates.

4.3 Safety in school

A number of procedures are in place to ensure the safety of pupils in school.

- Entry to school premises is controlled by secure doors, and constant staff supervision or video surveillance.
- Members of staff wear name badges.
- Agency and supply staff have their identity checked to ensure that the person presenting at the school is the same person on whom the agency has provided checks. They must also present their DBS certificate when arriving at the school.
- Authorised visitors are logged in and out of the premises and asked to wear visitor badges. Unidentified visitors will be challenged by staff or reported to the Head or School Office.
- The presence of intruders and suspicious strangers loitering near the school will be reported to the Police and the LA so that other schools can be alerted.
- No internal doors to classrooms will be locked while pupils are present. All teaching rooms will have clear, unobstructed glass panels in the doors (except in a lockdown situation).
- Members of staff who work with children on a one to one basis are made particularly aware of policies and procedures with regard to safeguarding as the nature of their work means they are more vulnerable to allegations made against them or a pupil may see their individual lesson time as a private opportunity to make a disclosure.

4.4 First Aid and Medical Plans

Except in cases of emergency, first aid will only be administered by qualified first aiders. All first aid treatment will be recorded and where significant will be shared with parents at the earliest opportunity.

Children requiring regular medication or therapies for long term medical conditions will be made the subject of a medical plan that has been agreed with parents.

4.5 Online Safety (Also see ICT Acceptable Use Policy, Online Safety Policy, Personal Device Policy, Staff Code of Conduct)

The School's IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking access which may place unreasonable restrictions on what children can be taught.

There are policies and procedures in place about children having phones in school and accessing the internet on their phones while in school.

4.6 Use of cameras, mobile phones and other devices, including within the EYFS (Also see ICT Acceptable Use Policy, Online Safety Policy, Personal Device Policy, Staff Code of Conduct)

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly some people abuse children through taking or using images so we must ensure that we have appropriate safeguards in place.

- Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause distress.
- Parents should be aware that other parent in the school may object to parents being taken which, inadvertently or otherwise, include their children. Therefore, any images taken must be for personal use only and should not be shared on social media.
- Other visitors, volunteers and contractors in school are not permitted to take photographs in areas of the school without specific permission from the Head.
- Staff must not take video footage or photographs of pupils except for school purposes. School devices should always be used wherever possible. Photographs or videos of pupils must not be stored on personal cameras, mobile phones or other devices and should be uploaded to the school's system if they need to be stored for later use.
- Flash photography can cause distress or trigger seizures in those with medical conditions and therefore should not be used.
- CCTV is located around the school but is not installed in classrooms, changing rooms or loo areas.
- The general use of mobile telephones in all areas of the school (calls, texting and email) by parents and others is actively discouraged.

From time to time professional photographers are invited into the school to take group photographs or pictures of significant events; any professional photographers hired by the school will be subject to appropriate vetting checks and are expected to follow our ICT Acceptable Use Policy and Personal Mobile Device Policy when taking and/or publishing images.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

4.7 Pastoral and Safeguarding Education

Thomas's promotes the welfare of children through our Assembly programmes, PSHCE curriculum, the computing curriculum and parents' forums. Pupils are taught how to keep themselves safe and build resilience. They are given the information to avoid situations and persons, including over the internet and through mobile technology which/who could lead them into harm.

4.8 Promoting awareness of child wellbeing and possible safeguarding concerns

Pupil wellbeing has a high priority within the school and members of staff place great importance on spotting and supporting pupils who may be going through a difficult time. Initial concerns should be recorded on a Pupil Concern Form which can be downloaded from the Staff Forms area of the TLP and given to the DSL. However this should not override the need to report immediately any significant Safeguarding issues.

Each school discusses welfare issues and a weekly confidential report is shared with teachers to enable them to share concerns and identify issues at an early stage. These concerns may be related to academic, behaviour or general welfare.

4.9 Neutral Notification

There may be occasions when something occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another child or concerns about how their own behaviour might be misinterpreted. It is important that these concerns are reported. This process is called Neutral Notification and is a procedure for self-reporting or reporting about the behaviour and actions of others. See **Appendix 4**.

4.10 Remote Schooling (up to 8th March 2021)

During the period of remote schooling due to COVID-19 Thomas's will continue to have regard to the statutory safeguarding guidance, "Keeping children safe in education". Safeguarding considerations are included in each school's Remote Schooling Key Information documents which can be found in the Thomas's COVID-19 Policy.

Each school will generally always have a trained DSL (or deputy) available on site during the school day. If this is ever not the case, a trained DSL (or deputy) will be available to be contacted via phone or online video. Where a trained DSL (or deputy) is not on site a senior leader will take responsibility for coordinating safeguarding on site.

All members of staff will be asked to be particularly alert to signs of stress in pupils and enable pupils to talk about how they are feeling. Any safeguarding concerns will continue to be passed to the DSL (or deputy DSLs) promptly and any necessary referrals made to the relevant agencies or services as usual. Additional support will be provided for pupils in school where appropriate and available.

Any emerging concerns with pupils at the on-site hub or observed during remote learning will be discussed with parents in the usual way, unless the information known, leads the

DSL to believe this could place a pupil at risk of immediate and further harm, in which case a referral will be made to MASH without delay.

All parents / carers will be asked to inform the school if their child has experienced any key family changes (eg bereavements, changes in contact with key adults, significant events, health difficulties etc) so that school staff can ensure they can be effectively supported.

5. SAFEGUARDING PROCEDURES IN THE CASE OF CONCERNS ABOUT A CHILD (Also see **Appendix 1**)

It is important that a child in need or at risk of harm receives the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child;
- keep clear written records;
- listen to the views of the child;
- reassess concerns when situations do not improve;
- share information quickly and challenge inaction.

5.1 Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life. All school staff should be prepared to identify children who may benefit from early help as providing support at this stage is more effective in promoting the welfare of the child than reacting later. School practices may form part of early help strategies and should feed into Local Authority early help measures as required. Evidence should be kept of all early help interventions.

In the first instance staff should discuss early help requirements with the DSL. They will then take the lead but staff may be required to support other agencies and professionals in an early help assessment. Chapter 1 of *Working together to safeguard children (2018)* provides detailed guidance on the early help process.

5.2 Recognising indicators of abuse

Staff in schools are uniquely placed to observe outward signs of neglect or abuse, unexplained changes in behaviour or failure to develop. Children who are victims of abuse often display emotional and behavioural difficulties. Staff should also be aware that children with special educational needs or other vulnerable groups may be especially at risk of abuse and, therefore, extra care should be taken to correctly interpret apparent signs of abuse or neglect, acknowledging that behaviour mood or injury may relate to possible abuse and not just their SEN or disability. **Appendix 6** of this Policy lists some of the types of abuse with which staff should be familiar.

If a member of staff is concerned about a pupil the matter should be referred to the DSL or the deputy in the DSL's absence immediately. There should be a written record of this initial concern on the School's Concern form which can be found on the Staff Resources area of the Thomas's Learning Platform.

5.3 Dealing with a Disclosure

It takes a lot of courage for a child to disclose that they are being neglected and/or abused. They may feel ashamed or their abuser may have threatened what will happen if they tell;

they may have lost trust in adults or they may believe, or have been told, that the abuse is their fault.

If a child reports, following a conversation you have initiated or otherwise, about any risks to their safety or wellbeing the following procedure should be followed:

- Listen to the pupil, take their allegation seriously and reassure them that you will take action to keep them safe.
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you.
- Do not interrupt if he or she is recalling a significant event; the first account is usually the most accurate. However you may like to offer reassuring nods or words of comfort eg “I want to help,” “You are doing the right thing in talking to me”.
- Do not be afraid of silences, remember how hard this may be for the child.
- Do not guarantee confidentiality; referrals may have to be made in order to safeguard the pupil. At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. It may be intended to be supportive but they child may interpret it that they have done something wrong.
- Do not cross-question the pupil. Ensure that any questions that need to be asked to clarify understanding are as open as possible and do not lead the pupil. Let the pupil tell what he or she wants and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the pupil to become anxious and retract their information.
- Be aware that younger pupils may disclose issues of a safeguarding nature in general conversation or during their play rather than as a specific disclosure to a member of staff.
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Report orally to the DSL as soon as possible but certainly on the same day. If the DSL is not available, report to the Deputy DSL, the Head or a member of the SLT.
- Keep any suspicions confidential and not discuss them with anyone other than those mentioned above.
- Make a written note of the discussion as soon as possible and at the latest before the end of the day, to give to the DSL. Note time, date, place, people present and what was said, using the child’s own words as much as possible. Where possible the School Disclosure or Allegation Record (**Appendix 2**) should be used but if not available any paper will do. Records should be verbatim; the notes may be needed in subsequent court proceedings. All notes should be signed and dated.
- Do not attempt any examination or remove a pupil’s clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil’s injury. If injuries are clearly visible they should be recorded on a Body Map (**Appendix 3**).
- Do not required to investigate further; your role is to listen, record and report concerns to the DSL.
- Seek support if you feel distressed.

You may also become concerned about a pupil without a disclosure being made or without specific concrete evidence. There may be a change in a pupil’s behaviour or art or written work may show signs of confusion or distress.

There may also be concerns raised about a parent's or carer's interaction with a pupil or issues such as parental substance misuse, domestic violence or mental health.

If there are concerns at all incidents must still be recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore vitally important that these events are recorded and reported to the DSL immediately.

“The Data Protection Act and GDPR 2018 do not prevent or limit the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.” (KCSIE 2018 paragraph 75). “This includes allowing practitioners to share information without consent”. (Paragraph 77).

5.4 Recording safeguarding concerns

Abuse and neglect are complex issues and are rarely standalone events; therefore they require a culture of vigilance, professional insight and respectful challenge, as well as effective recording, reporting and monitoring systems.

All safeguarding concerns must be recorded on a Pupil Concern Google Form or an Allegation/Disclosure form (**Appendix 2** of this policy.)

Any conversations directly with a pupil or overheard arising to concerns should be recorded in writing. The record should include the date, time and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.

The record should be made as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.

The record should contain facts and information only, avoiding personal opinion.

Avoid general terms such as inappropriate language/behaviour be as specific as possible.

On receipt the DSL will record the action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- Monitoring the pupil in school
- A discussion with parents
- Early help intervention from the school and/or another agency
- Referral to Children's Services
- Referral to the LADO
- Report to the police

5.5 Preserving evidence

All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be safeguarded and preserved.

If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.

Staff should not view images, look for further images, copy or print any images or forward images by email or any other electronic means.

5.6 Referral to Children's Social Care

Referrals about a child must be made to the borough in which the child resides. The policy of the school requires that all referrals are made by the school's DSL; however, in exceptional circumstances staff may raise concerns directly with Children's Social Care themselves. Anyone can make a referral.

If at any point there is a risk of immediate serious harm to a pupil, a referral should be made to Children's Services or the police immediately.

If there is room for doubt as to whether a referral should be made, the DSL will consult with CSC on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm a referral to CSC will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the CSC within 24 hours. If no response or acknowledgement is received within one working day the DSL will contact the CSC again.

This referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation.

If after a referral the child's situation does not appear to be improving the DSL (or person who made the referral) should press for reconsideration to ensure their concerns have been addressed. All referrals and reconsiderations should be evidenced. The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email help@nspcc.org.

5.7 Communication with Parents

All parents are aware from the school's website that the school has a safeguarding policy and is required to follow statutory guidance to safeguard its pupils.

The school aims to work closely with parents to help support pupils and their families; however, it will always put the duty of care to the pupil as its priority and will refer concerns if it considers a pupil is or may be at risk of harm or has suffered harm.

The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. The reasons for the school's concerns will be explained along with the course of action the school intends to take.

Referrals to Children's Social Care do not require prior parental consent. The DSL must act in the best interests of the pupil, even if this results in making a referral against the parents' wishes.

Normally, when there are Safeguarding concerns, the Designated Lead will contact parents before making a referral to Children's Social Care. However if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the CSC.

Contact details for the Local Authority and neighbouring local authorities can be found in the individual school supplements.

5.8 Dealing with allegations of abuse against a member of staff

If any allegation of abuse is made against a member of staff or volunteer local safeguarding partner procedures will be followed and the school will have regard to the guidelines on practice and procedure given in Part 4 of the DfE statutory guidance 'Keeping children safe in education.'

The School's procedure for dealing with allegations made against staff or volunteers will be used following any safeguarding concerns about a member of staff or volunteer. Allegations that might indicate that a person is unsuitable to continue to work with children are where a person has:

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a child;
- behaved towards a pupil or children in a way that indicates that he or she would pose a risk of harm if they work regularly or closely with children.

This procedure relates to members of staff, volunteers or other adults who are currently working in the school regardless of whether the school is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the school has information to indicate that a former staff member is working with children in another location this will also be reported to the Local Authority's Designated Officer (LADO) in that location and to the senior management of the school where that member of staff is currently working.

If an allegation is made against a current member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

A member of staff receiving an allegation of abuse against another member of staff should report this immediately to the Head, unless the Head is the one against whom the allegation is made. An allegation against the Head should be reported to a Principal, without the Head first being informed. If the Head is absent, the report should be made to a Principal. If the concern is about a Principal the report should be made directly to the LADO for the borough in which the school is situated without first informing the Principal.

An allegation against a member of staff must always result in a senior person at the school (as detailed above) contacting the relevant LADO who will guide the next steps to be taken. Under no circumstances should the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases may be discussed without identifying individuals in the first instance and following discussions the LADO will advise in the circumstances what further steps should be taken. All discussions with the LADO should be recorded in writing.

- The Head (or Principal) should record any information about dates, times, locations and names of potential witnesses.
- An initial assessment of an allegation should be made by the local authority duty officer (LADO) and the Head (or Principal) to judge whether:

- there is need for immediate action to protect the pupil;
- the allegation is demonstrably false;
- there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures.
- The Head will generally inform the accused person about the allegation as soon as possible after consulting the LADO unless there is a need to consult with other external agencies first in a strategy discussion.
- In response to an allegation all other options should be considered before suspending a member of staff: suspension should not be the default option. An individual should be suspended only if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the employer and the individual notified of the reasons.
- The parents or carers of the child(ren) involved will be informed of the allegation as soon as possible, if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.
- Where a referral is made because the pupil has suffered or is likely to suffer significant harm, or the alleged abuse is a criminal offence, the Local Safeguarding Partner procedures will be followed. The local authority will be informed of all allegations and be invited to discuss the allegation with the Head to confirm details and the best way of informing parents (if they are not already aware).
- Teachers are permitted to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour. (see Behaviour Policy). This should be taken into account if the allegation is about physical contact.
- If the allegation is not false or unfounded and there is cause to suspect a pupil is suffering, or likely to suffer significant harm, a strategy meeting will be convened
- The LADO may hold meetings with other agencies e.g. the police, if it is judged that the threshold of significant harm has not been reached.
- In cases where other interagency involvement is not required, the LADO will discuss with the Head what steps to take. The Head may decide to take no further action, to dismiss the person or not to use that person's services in the future.
- Where further investigations are required before deciding how to proceed, the Head will decide, with the LADO, who will investigate; this may be an independent investigator provided by the Local Authority.
- The Head will make the decision whether or not to suspend, given the risk to the pupil and where the allegations warrant investigation by police.
- It is extremely important that when an allegation is made, every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Head will take advice from the LADO and other agencies to agree:
 - Who needs to know and, importantly, exactly what information can be shared
 - How to manage speculation, leaks and gossip
 - What, if any, information can be reasonably given to the wider community to reduce speculation
 - How to manage press interest if, and when, it should arise

Outcomes of allegations against members of staff may be defined as Substantiated, False, Malicious, Unsubstantiated or Unfounded.

- If the person is considered unsuitable to work with children, a report will be made to the Disclosure and Barring Service (DBS) within one month of their leaving the school.
- For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education.
- For children in the Early Years Foundation Stage the school will also inform Ofsted (Tel: 0300 123 1231) within 14 days at the latest of any allegations of serious harm or abuse and of the action taken in respect of these allegations.
- If an allegation is unsubstantiated and the person returns to work, the school will support that person through offering for example, a phased return or a mentor. The School will also consider how to manage the contact with the child(ren) who made the allegation.
- Allegations that are found to be malicious should be removed from personnel records; and any that are proved to be unsubstantiated, false, malicious or unfounded should not be referred to in employer references.

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.

Many cases may well not warrant the consideration of either a police investigation or enquiries by the Local Safeguarding Partners. In these cases internal arrangements should be followed to resolve cases without delay. However some rare allegations will be so serious they require immediate intervention by the Local Authority and/or the police. The LADO should be informed of all allegations that come to the school's attention so they can consult police and children's social care services as appropriate.

6. LEGISLATION AND GUIDANCE

This policy pays due regard to the following statutory guidance and other government advice. It also complies with other legal requirements and guidance and follows advice from the School's Local Safeguarding Partners (specific details in School Supplements)

DfE statutory guidance 'Keeping children safe in education (KCSIE) (Jan 2021) (including non-statutory interim supplements to KCSIE issued during the Coronavirus pandemic)
 DfE Guidance 'Coronavirus (COVID-19): safeguarding in schools, colleges and other providers' (2020 subject to ongoing DfE updates) and
 'Safeguarding and remote education during coronavirus (COVID-19)
 Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (April 2020)
 DfE guidance 'Teaching online safety in school' (June 2019)
 London Child Protection Procedures (5th edition 2017 amended March 2019)
 Mental health and behaviour in schools: departmental advice (November 2018)
 HM Gov guidance 'Working together to safeguard children' (July 2018)
 DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)

DfE advice 'Sexual violence and sexual harassment between children in schools and colleges' (May 2018) summarised in Part 5 of KCSIE

Designated teacher for looked after children (February 2018)

The specific legal requirements in the "Safeguarding" section of Safeguarding and promoting children's welfare, Part 3 of the Statutory Framework for the Early Years Foundation Stage (2017)

DfE statutory guidance 'Children missing education' (September 2016)

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

Prevent Duty Guidance for England and Wales (originally issued March 2015 revised July 2015) ("Prevent") Prevent is supplemented by non-statutory advice: The Prevent duty: Departmental advice for schools and childcare providers (June 2015) and a briefing note for schools about the use of social media for on-line radicalisation (July 2015)

HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)

Teacher misconduct: the prohibition of teachers (October 2015)

DfE statutory guidance 'Disqualification under the Childcare Act 2006' (February 2015)

Paragraphs 7 and 16 of the Schedule to the Education (Independent School Standards) Regulations 2014 (SI 2014 No.3283)

This Policy was audited externally in September 2020 by Dianne Barratt, ISI Consultant

7. POLICY REVIEW RECORD

This policy will be reviewed annually		
Created: 2008	By:	Tobyn Thomas, Ben Thomas, Principals Jill Kelham, Vice Principal
Latest Review: March 2021	By:	Joanna Copland, Vice Principal Suzannah Cryer, Designated Safeguarding Lead, Battersea Helen Stewart-Morgan, Designated Safeguarding Lead, Clapham Lee Walters, Designated Safeguarding Lead, Fulham Jo Ebner, Designated Safeguarding Lead, Kensington
Approved: March 2021	By:	Tobyn Thomas, Ben Thomas, Principals Simon O'Malley, Headmaster, Battersea Phil Ward, Headmaster, Clapham Annette Dobson, Headmistress, Fulham Jo Ebner, Headmistress, Kensington Ben Thomas, Head, Battersea Square
Next Review: September 2021	By:	Joanna Copland, Vice Principal Cross-School Leads

8. APPENDICES

Appendix 1: Procedure flowchart for raising a concern about a child

Appendix 2: School Disclosure or Allegation Record

Appendix 3: Body map for location of any visible injuries

Appendix 4: Neutral Notification at Thomas's

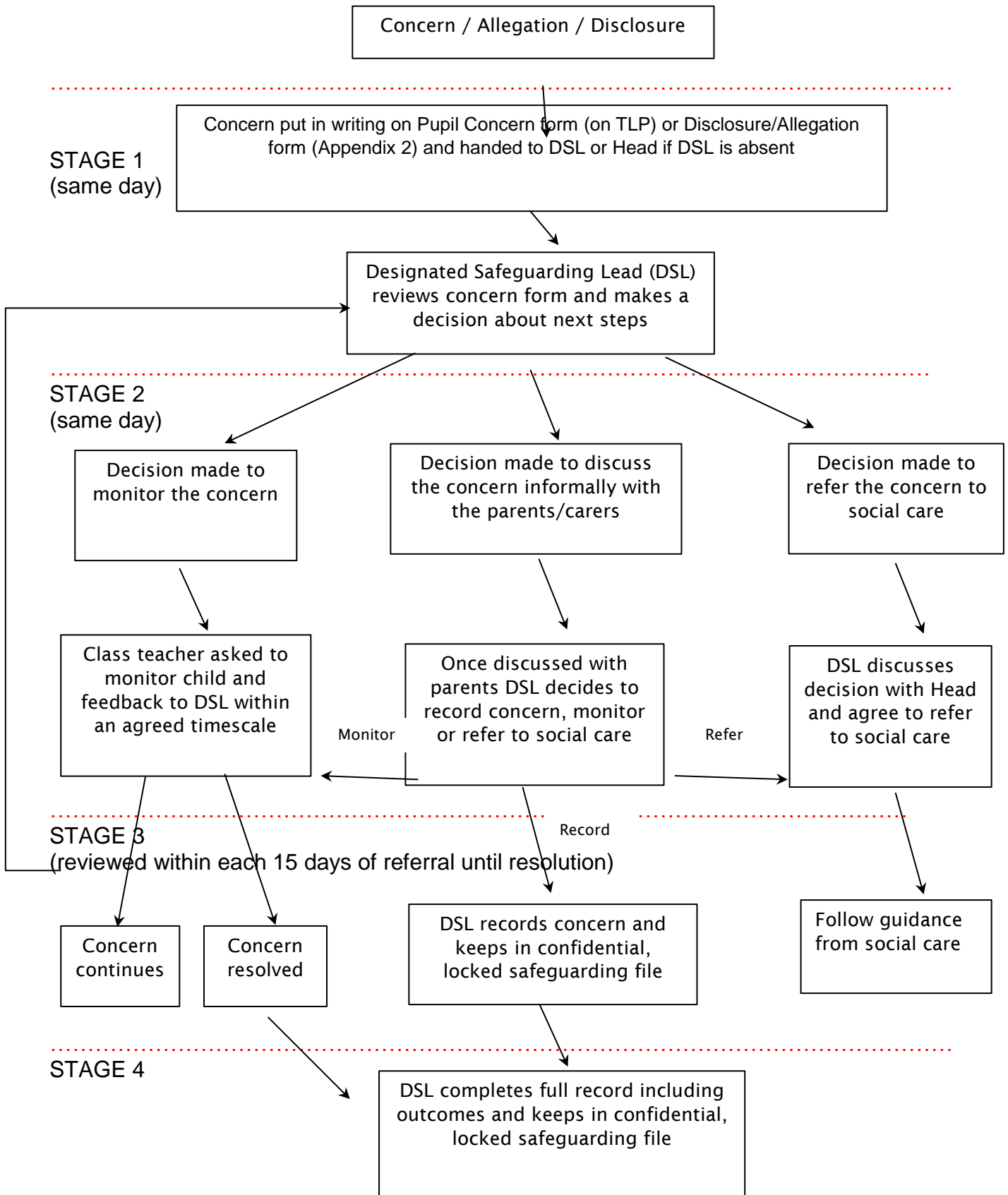
Appendix 5: Roles and responsibilities of the Designated Safeguarding Lead and Deputy

Appendix 6: Definitions and signs of abuse

Appendix 7: Useful references and organisations

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 1

PROCEDURE FOR RAISING A CONCERN ABOUT A CHILD



SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 2



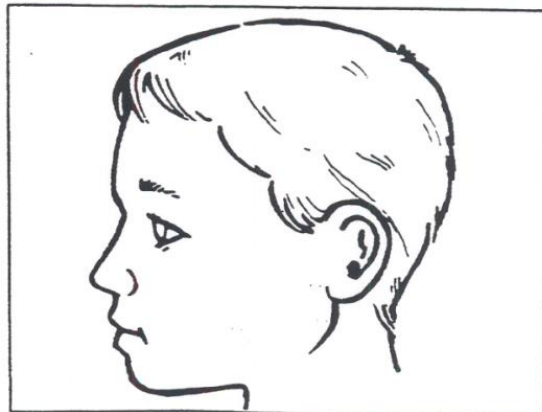
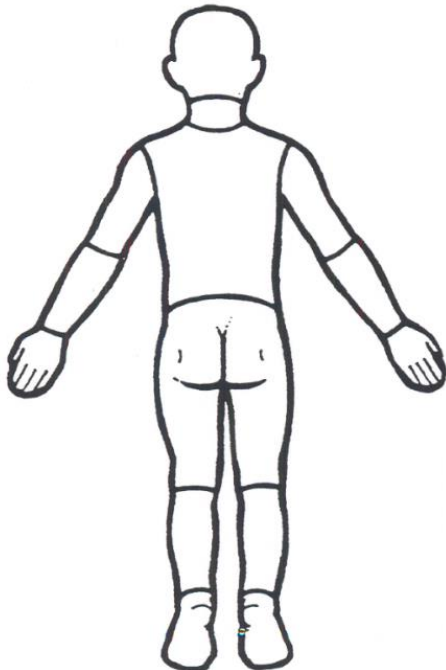
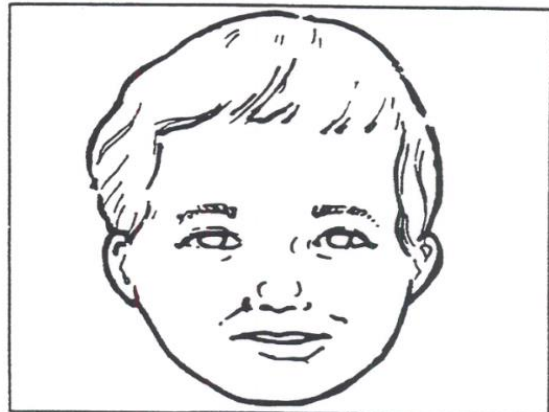
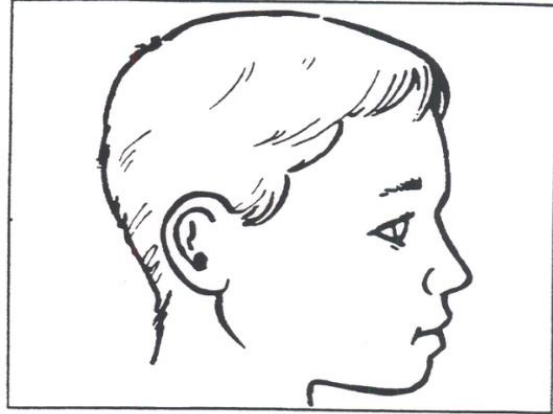
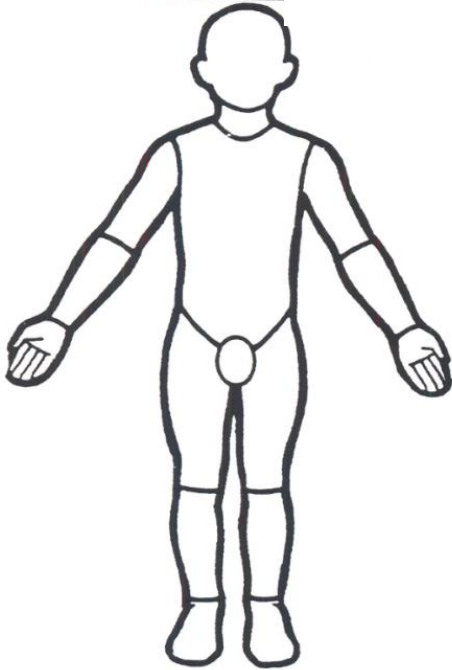
For a more general concern please complete a Pupil Concern Google Form which can be found on the Staff Forms area of the TLP and submit it to your DSL.

SCHOOL DISCLOSURE OR ALLEGATION RECORD (Guidance taken from the Child Protection Safeguarding Handbook for Schools)			
Name:		Form / Class:	
Date of birth:		Class teacher / Form tutor:	
Date and time of concern/disclosure/allegation:			
<p>Why are you concerned about this pupil? <i>(Please provide a description of any incidents / conversations and the dates they occurred. You must make clear what is fact and what is hearsay. You must not ask the pupil leading questions or try to investigate the concern yourself.)</i></p>			
<p>What have you observed and when? <i>(This relates to anything you have personally witnessed)</i></p>			
<p>What have you heard and when? <i>(Write here anything you have been told by the pupil or any other person. Be clear about who has said what)</i></p>			
<p>What have you been told and when? <i>(This may be third-party information that is relevant but as yet unsubstantiated)</i></p>			

If any allegation has been made, give any details you have about the alleged abuser			
NB: The DSL should be informed before anything is mentioned to parents. After that do those with parental responsibility know this form has been completed?			Yes / No
If not, why not?			
If yes, what did they say?			
NOTE: Those with parental responsibility should not be contacted by anyone in the school if this could place the pupil at risk. Speak to the DSL first.			
Does the pupil have any visible injury or have they told you they have been injured?			Yes / No
If so, has medical advice been sought?			
<i>If the pupil has a visible injury, please indicate the location on the body map (Appendix 3) and staple the body map to this form.</i>			
Has any action already been taken in relation to this concern (eg pupil taken out of class)			
Name and position of the person this record was handed to		Day, date and time this person received this record	
If not the DSL please explain why			
Your name:		Your signature:	
Your position in school		Date and time of this record	
<ul style="list-style-type: none"> ● <i>If you are not a member of the school staff please provide details of your school/agency or service together with a contact telephone number</i> ● <i>If you have used additional sheets to complete this record of concern, please staple them to this form and write the number of additional sheets here</i> ● <i>Hand this form to the Designated Safeguarding Lead for your school before you go home. If the DSL is unavailable hand it their deputy, the Head or, as a final option, your line manager</i> ● <i>If you do not have certain information, such as the pupil's date of birth, do not delay handing in the form. Ask the DSL to complete the information</i> 			

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 3

BODY MAP FOR LOCATION OF VISIBLE INJURIES FOLLOWING A PUPIL DISCLOSURE OR ALLEGATION



SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 4

NEUTRAL NOTIFICATION AT THOMAS'S

There may be occasions where something occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another child or concerns about how their own behaviour might be misinterpreted.

It is important that any concerns, or incidents which might give rise to concerns about the conduct of staff, are reported to the Head and DSL, however minor. In the vast majority of cases, there will be a perfectly innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case. Reporting of these types of concerns is a neutral act, and the Head and DSL will, on receipt of the report, determine how best to approach the issue.

Neutral Notification should be used by staff to record all events and/or situations which have the potential to be misconstrued or misinterpreted by others; or where they are at all concerned about the behaviour of an adult, not just where it is clear that a role or professional boundary has been broken. The purpose of neutral reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

The Neutral Notification system is intended to enable staff to self-report, as well as to make notifications about other staff members. It is accepted that there are occasions when school staff, as professionals, have to make decisions to act in a particular way in order to protect the health, safety and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position or cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation in future. In this scenario, staff must make a Neutral Notification.

Neutral Notifications may be made in person to the Head or DSL (as appropriate) or submitted via the Neutral Notification Google Form which can be found on the Staff Forms area of the TLP. If the notification is made in person in the first instance, staff may be required to complete a Neutral Notification Form later.

A staff member who makes a Neutral Notification, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the Whistleblowing Policy.

The circumstances in which staff must make a Neutral Notification are as follows:

- Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation;
- Any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- Any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (school medical staff are exempt from this).

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 5

DSL and Deputy DSL Responsibilities

The three broad areas of responsibility are:

1. Promoting the School's Safeguarding Ethos

- To act as a source of support, advice and expertise to staff within the school on all aspects of safeguarding.
- To be the first point of contact for parents, pupils, staff and external agencies
- To encourage a culture of listening to children and taking account of their wishes and feelings, amongst all staff, and in any measures the school may put in place to protect them.
- To ensure that all staff understand their responsibilities to report any concerns
- To ensure mechanisms are in place to assist staff to understand and discharge their roles and responsibilities with regard to safeguarding and child protection
- To ensure that all parent volunteers and PTA Reps working in school are aware of the School's Safeguarding Procedures.
- Be alert to the specific needs of children in need, including those with special educational needs and young carers.
- To carry out a risk assessment, in line with Prevent guidelines for pupils and staff who may be in danger of radicalisation.
- To ask previous schools for details of any safeguarding issues for pupils new to the school.
- Where children leave the school to ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file. ensuring secure transit and confirmation of receipt should be obtained
- To be responsible for overseeing online safety in the school with the support of the school's IT manager.
- To liaise with the Digital Leads to ensure that the filtering of IT equipment undergoes a regular, proactive monitoring regime.
- To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
- To ensure the school Safeguarding Policy is available on the School's website.
- To ensure the School's Safeguarding Policy is reviewed annually, or sooner if there is new legislation or guidance, and the procedures and implementation are updated and reviewed regularly.
- To ensure the Safeguarding Policy is reviewed annually in conjunction with the school's proprietor.

2. Liaison with other agencies

- Develop effective links with relevant statutory and voluntary agencies and to be the first point of contact for outside agencies who are pursuing Child Protection investigations.
- To decide whether a referral about a child is required by liaising with relevant agencies. Where there is any doubt, advice will always be sought from the Children's Services Duty Manager.
- To be responsible for referring cases of concern or suspected abuse to Children's Services.
- To report to the LADO any allegations about a member of staff or volunteer. Referrals will be confirmed in writing within 24 hours.

- To inform the Disclosure and Barring Services in cases where a person is dismissed or left the school due to risk/harm to a child.
- To inform the police in cases where a crime may have been committed.
- To keep detailed, accurate, secure written records of concerns and referrals
- To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- To ensure records are sought from previous schools and forwarded to receiving schools if pupils join/leave. Any child protection information is copied for the new school as soon as possible and transferred securely and separately from main file.
- To report to the local authority any pupil who fails to attend school regularly or has been absent, without the school's permission for a continuous period of 10 school days or more.
- To follow up any concerns from staff with regards to poor pupil attendance or regular absences, in line with procedures set out in the Attendance Policy.
- To liaise with the Head to inform him or her of any issues and ongoing enquiries.
- To follow the School's mandatory duty to report to the Local Authority where it is aware of or suspects that any child is subject to a Private Fostering Arrangement (an arrangement made without the involvement of the Local Authority for the care of a child under the age of 16 years of age, by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more).
- To speak to the family of any child subject to a private fostering arrangement to check they are aware of their duty to inform the Local Authority.

3. Training

- To maintain a regular training programme for all members of the school's staff and volunteers in line with advice from the Local Safeguarding Partners (LSP).
- To ensure all new staff receive induction training in safeguarding and understand their responsibilities.
- To receive inter agency training every two years along with annual updates. New information will be shared with staff, Heads, Principals and Vice Principal.
- To understand the assessment process for providing early help and intervention.
- To understand the process for making referrals to Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- To have a working knowledge of how local authorities conduct a child protection case conference and be able to attend and contribute to these effectively when required.
- To obtain access to resources and attend any relevant or refresher training courses.
- To ensure each staff member has received appropriate training to be refreshed every three years, as well as annual updates, particularly of issues that may not have previously been explicit such as peer-on-peer abuse, child sexual violence and sexual harassment, so-called Honour Based Violence and the additional safeguarding vulnerabilities of children with special educational needs.
- To keep a record of staff attendance at safeguarding training.
- To keep a record of all safeguarding training carried out. These may be in the form of bitesize chunks or quizzes/surveys.
- To get feedback from staff on the effectiveness of training, procedures and forms.
- To encourage members of staff to build a safeguarding learning and development portfolio recording attendances at sessions and their responses to the learning.

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 6

DEFINITIONS AND SIGNS OF ABUSE

Abuse: *a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. (KSCIE, 2021)*

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

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

Any concern whatsoever must be reported to the DSL. In many cases it is not one major incident which triggers a referral but a series of seemingly more minor events. It is therefore highly important that these events are recorded and reported to the DSL immediately. In addition a series of smaller events may be reported by a number of staff which provides the DSL with a wider perspective of the child's situation.

Factors which may make a child particularly vulnerable to abuse include:

- living in a home where there is domestic abuse;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care or who have returned home to their family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

DEFINITIONS

There are four types of child abuse. They are defined in the DfE Statutory Guidance 'Keeping children safe in education' (2021) as follows:

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

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.

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

Further safeguarding issues of which staff should be aware are:

- a child missing from education
- a child missing from home or care
- bullying including online bullying
- children and the court system
- child criminal exploitation (CCE) – see below
- child sexual exploitation (CSE) – see below
- children with family members in prison
- domestic violence – see below
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see below
- forced marriage
- gangs and youth violence (possibly serious violence)
- gender based violence
- homelessness
- so-called ‘honour based’ violence
- mental health
- peer on peer abuse – see below
- private fostering
- preventing radicalisation – see below
- sexting
- sexual violence and sexual harassment
- teenage relationship abuse
- trafficking
- upskirting

Further information can be found in DfE Statutory Guidance ‘Keeping Children Safe in Education’. <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

KCSIE also recognises the following as specific safeguarding issues:

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Sexual and criminal exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including

cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

- Inappropriate relationships:
 - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- Boyfriend:
 - Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- Organised exploitation and trafficking:
 - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Domestic Violence and Abuse

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will usually inform the designated safeguarding lead in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Risk factors for FGM include:

- low level of integration into UK society;
- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE;
- visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable;
- spending longer than normal in the bathroom or loo due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- frequent urinary, menstrual or stomach problems;
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- reluctance to undergo normal medical examinations;
- confiding in a professional without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils. Unless there are exceptional circumstances, concerns about FGM should be taken to the DSL, rather than the police.

Peer on Peer Abuse (also see Behaviour Policy and Anti-bullying Policy)

Preventative strategies for peer on peer abuse are regularly considered by the school. The school also ensures that pupils feel safe to confide and share information about anything that is distressing them and any inappropriate language or behaviour is always challenged by staff. The PSHE curriculum and pastoral care system also gives pupils the opportunity to talk about disputes or difficulties.

Children are vulnerable to abuse by their peers. Such abuse must be taken as seriously as abuse by adults and must be subject to the same child protection procedures, never being seen as banter or just part of growing up. The school recognises the gendered nature of peer on peer abuse but all peer on peer abuse is unacceptable and will be taken seriously. Peer on peer abuse may include (but is not limited to) abuse which is physical, emotional, sexual violence or harassment, bullying (including online bullying), sexting, upskirting and

initiation/hazing type rituals, as well as other forms of abusive behaviours.

Staff receive safeguarding training and anti-bullying training so they are aware of the harm caused by peer on peer abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and Safeguarding procedures as appropriate.

If a child or young person causes harm to another, this will not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. As with other safeguarding decisions, the threshold for dealing with an issue of pupil behaviour or bullying as a safeguarding matter is subject to local guidance and professional judgement. However, it may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
- the perpetrator has repeatedly tried to harm one or more other children;
- there are concerns about the intention of the alleged perpetrator;
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'.

Pupils may be perpetrators of abuse but all children, whether regarded as a perpetrator or a victim, should be regarded as being "at risk".

A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the usual safeguarding reporting procedures contained in this policy.

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police. The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

Any support or sanctions required following a report of peer on peer abuse will be determined on a case by case basis.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case by case basis depending on the circumstances.

Sexual behaviour and sexual abuse by young people

The boundary between what is part of normal childhood experimentation or abusive behaviour can be blurred. The decision about whether behaviour is developmental, inappropriate or abusive will be determined by the concepts of consent, power imbalance and exploitation.

Developmental sexual activity occurs in children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. It is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour which involves coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability;
- reflective of natural curiosity, experimentation, consensual activities and positive choices.

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- unusual for that particular child or young person;
- of potential concern due to age or developmental differences;
- of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour.

They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening;
- involving significant age, developmental or power differences;
- of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for a referral to Children's Social Care.

Children requiring mental health support

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

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behavior
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder

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

If staff have a concern about the mental health of a child they should report this to the DSL following the procedures outlined in this policy.

More information can be found in the *DfE 'Mental Health and Behaviour in Schools' guidance*.

Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

The curriculum is used to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

The school is committed to ensuring that pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 7

Useful references and organisations

London Safeguarding Children Board www.londonscb.gov.uk

National Society for the Protection of Children www.nspcc.org.uk Tel: 0800 800 500

Child Line www.childline.org.uk Tel: 0800 1111

Kidscape www.kidscape.org.uk

Stonewall www.stonewall.org.uk

The Safe Network www.safenetwork.org.uk

Barnado's www.barnados.org.uk

'Educate against Hate' DfE Website (launched January 2016) educateagainsthate.com

'What to do if you're worried a child is being abused.' Published by DFE (2015)

'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.' Published by the Safer Recruitment Consortium (May 2019)

Mentoring site where users can give and receive confidential advice. www.horsemouth.co.uk

Domestic Violence Website for young people www.thehideout.org.uk/

Below is a selection of useful teaching resources on domestic abuse/violence for schools

'Is this Love?' Lesson plans and guidance for schools
<http://www.devon.gov.uk/adva-education-pack.pdf>

Respect Training Resources for primary and secondary schools – developed in Scotland but an excellent resource for use in all schools. www.zerotolerance.org.uk

'Stop Hitting Mum' – Children talk about domestic violence (2003) Mullender A, et al Young Voice.

'Hitting and Hurting – Living in a Violent Family' Pickering, F (2000) The Children's Society.

'Child protection and domestic violence' Mullender A, Dobbonair T (2000) Venture Press.

Children's Perspectives on Domestic Violence, Mullender A, Hague G, and Regan L (2002), Sage.

Feeling Happy, Feeling Safe (a safety guide for young children), Michelle Elliott (6 – 11 year olds) (1991) ISBN 0340546646