



URSULINE HIGH SCHOOL
Wimbledon

Safeguarding and Child Protection Policy

April 2021

Updated in line with KCSIE guidance 2020, effective from 1st September 2020 and includes Jan 21 updates

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1. Terminology

Safeguarding and promoting the welfare of children is defined as:

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

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early Help means the providing support as soon as additional needs and support emerge at any point in a child's life.

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18 and applies to pupils/ students of our school; however the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, e.g. step-parents, foster carers, adoptive parents and those adults caring for children with a Special Guardianship Order.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MASH refers to the Multi Agency Safeguarding Hub



Ms Michelle Alexander
Assistant Headteacher

Designated Safeguarding Lead



Mrs Rachael Gilmore
Mental Health Lead & 6th Form Designated Safeguarding Lead



Mrs Sarah McCourt
Safeguarding Officer Year 7 & 8 Pastoral Assistant



Ms Jo Wild
Wellbeing Coordinator
Safeguarding Officer



2.Safeguarding Statement 2020

At Ursuline High School we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities. We expect all staff, governors and volunteers to share this commitment to safeguarding our pupils.

We follow the **Merton Children's Safeguarding Partnership** procedures and have a number of policies and procedures in place which contribute to our safeguarding commitment, including our Child Protection & Safeguarding Policy. A copy of this policy is available on our website.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

Head Teacher is responsible for implementing policies & procedures, allocating resources to the safeguarding team & addressing staff safeguarding concerns.

Ms J. Waters

Tel: 0208 3908 3124

Designated Safeguarding Lead (DSL): a member of the leadership team with appropriate authority, responsible for dealing with safeguarding issues, providing advice and support to other staff, liaising with the local authority, and working with other agencies.

Ms M. Alexander

Tel: 020 3908 3139

Designated Safeguarding Deputies: a member of the teaching, support or pastoral staff, in a post which requires assessment of children and with sufficient status & authority to effectively deputise for the DSL role above. This cannot be an administrative or finance worker.

Mrs Gilmore – 020 3908 3168

Mrs McCourt -0208 3908 3182

Special Educational Needs Coordinator (SENCo): a staff member who provides advice, liaison & support for school staff and other agencies working with pupils with special education needs and their parents or carers.

Ms Delhoum -020 3908 3132

Ms O - 0203 908 3132
Conor

Wellbeing Coordinator:

Ms Wild -020 3908 3197

Pastoral Support Assistant Y7-Y8:

Mrs McCourt -0208 3908 3182

Pastoral Support Assistant Y9-Y10:

Mr Owusu- 0208 3908 3179

Pastoral Support Assistant Y11

Mrs Brown – 0203 908 3120

Designated Lead for LAC:

Ms M. Alexander – 020 3908 3139

Deputy Designated Lead for LAC:

Mrs Gilmore – 020 3908 3168

The Safeguarding Children Team also links in with the:

Safeguarding/Child Protection Governor:

ensures there are appropriate safeguarding children policies and procedures in place, monitors whether they are followed and, together with the rest of the governing body, remedies deficiencies and weaknesses that are identified.

Ms Karen Peck

Tel: Via 020 3908 3122

Chair of Governors: takes the lead in dealing with allegations of abuse made against the Head Teacher /Senior Manager (and other members of staff when the Head Teacher is not available), in liaison with the Local Authority; and on safe recruitment practices with the Head Teacher /Senior Manager.

Ms Claire Thorogood

Tel: Via 020 3908 3122

3.Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: 'Working Together to Safeguard Children' 2018, 'What to do if You are Worried a Child is Being Abused' 2015.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2020 (KCSIE), and Merton Children's Safeguarding Partnership (MCSP) Procedures.

The Governing Body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

This policy applies to all members of staff and governors in the school.

3.1Guidance and documents referred to in this policy

- [Working Together to Safeguard Children \(2018\)](#)
- [Keeping Children Safe in Education 2020 \(KCSIE\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [The Equality Act 2010](#)
- [Advice from NSPCC – When to call the police](#)
- [Government advice on Coronavirus \(Covid-19\)](#)
- [Revised Prevent Duty Guidance for England and Wales 10 April 2019](#)

3.2 Related Policies

The Ursuline High School fully recognises its responsibilities for child protection and safeguarding. This policy sets out how the School will deliver these responsibilities. This is an overarching policy and forms part of a suite of documents and policies which relate to the child protection and safeguarding responsibilities of the school.

The following policies fall under our safeguarding umbrella and have links with this policy:

- Staff Code of Conduct
- Anti-Bullying
- Positive Behaviour Support Policy
- Positive Mental Health Policy
- SEND policy
- Behaviour for learning
- Recruitment & Selection
- Whistle-blowing
- Attendance
- Computer misuse
- Education of Human Love Policy
- Social Media
- Data Protection (GDPR)
- Health and Safety including site security
- Equalities Diversity and Cohesion Policy
- Disability and Equalities Policy
- Students with medical conditions (incorporating Medical Room procedures)
- Educational visits
- Substance Misuse Policy
- Prohibited Items
- Online Safety Policy

4. Policy Principles & Values

Safeguarding arrangements at this school are underpinned by these key principles:

- Safeguarding is everyone's responsibility: all staff / anyone who has contact with a child or young person including governors and volunteers must play their full part in keeping children safe.
- We will aim to protect children using national, local and school child protection procedures.
- The welfare of the child is paramount
- All Staff /anyone who has contact with a child or young person including governors and volunteers *should have a clear understanding regarding abuse and neglect in all forms, including how to identify, respond and report. This also includes knowledge of the process for allegations against professionals. Staff, (including governors and volunteers) must feel confident that they can report all matters of safeguarding in the school where the information will be dealt with swiftly and securely, following the correct procedures with the safety and wellbeing of the children in mind at all times.*
- We operate a child-centred approach: a clear understanding of the needs, wishes, views and voices of children.
- child's new setting and ensure the school medical records are forwarded as a matter of priority and within statutory timescales.
- We will encourage the use of strategies to encourage children to share concerns as well as access to ELSA. Children know who they can talk to if they don't feel safe.

- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the school will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

4.1 Policy Aims

- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- To enable the school to effectively contribute to Early Help, assessments of need and support for those children.
- To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a Single Central Record is kept for audit.

5. Our ethos

The Ursuline High School is committed to safeguarding and promoting the welfare of all its pupils. The school will always take a considered and sensitive approach in order that we can support all our students and recognise that each students' welfare is of paramount importance. Our school will establish and maintain an ethos where:

- safeguarding is threaded through everything we do in our school ('the golden thread') including the curriculum;*
- pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school if they are worried or concerned about something, be it with regard to adults or their peers; We will include

regular consultation with children e.g. through safety questionnaires and participation in anti-bullying activities;

- c) we recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are encouraged to maintain an attitude of '*it could happen here*' where safeguarding is concerned;
- d) through robust training and induction, all staff and regular visitors will know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information;
- e) every pupil will know what the adult will have to do with any information the child/young person has disclosed; and
- f) at all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with '*Working Together to Safeguard Children*' (2019).

We recognise that some children may be especially vulnerable to abuse. Additional barriers can exist, for example, when recognising abuse and neglect for children with Special Educational Needs (SEN). We recognise that children who are abused or neglected may find it difficult to develop a sense of worth and to view the world in a positive way. Whilst at school their behaviour may be challenging and we recognise that some children who have experienced abuse may harm others.

6. Prevention / Protection

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

With reference to our values and ethos, The Ursuline High School will:

- a) include regular consultation with children e.g. through safety questionnaires and participation in anti-bullying activities;
- b) ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty;
- c) include the teaching of safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include online safety, anti-bullying work, transition support; prevention of radicalisation etc;
- d) ensure all staff members are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

7. Safe School, Safe Staff

We will ensure that:

The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children. All staff have a responsibility to inform the school where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in the school. A DBS check is carried out for all new employees, staff have a responsibility to inform the Headteacher if their circumstances change whilst employed at the school. This statement is in the Staff Behaviour Policy, which all staff have signed and agreed to adhere to.

All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, Staff Behaviour Policy (Code of Conduct), Child Protection Policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and [Keeping Children Safe in Education \(2020\) part 1 and annex A](#).

All staff receive safeguarding and child protection training at induction in line with advice from Merton Children's Safeguarding Partnership which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually. In addition, we deliver weekly TED talks on hot topic safeguarding update sessions for all staff.

All members of staff are trained in and receive regular updates in online safety and reporting concerns

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Child Protection Policy on the school's website and hard copies being available at the school office and reference to it in the school's handbook.

We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to Early Help arrangements and inter-agency working and plans.

Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.

Community users organising activities for children are aware of the school's Child Protection Policy, guidelines and procedures.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(s), are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected harm and abuse.

8.Roles and Responsibilities

8.1 All School Staff:

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Provide a safe environment in which children can learn.

- 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 who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015).
- Report their concerns to the DSL immediately and on that day if they are worried a child is being abused and record their concerns on an CPOMS. If the DSL is not contactable immediately, a Deputy DSL should be informed.
- Be prepared to refer directly to the MASH and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Inform the Headteacher if the disclosure is an allegation against a member of staff, supply staff or volunteer.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to "keep a secret".
- Have an understanding of Early Help and be prepared to identify and support children who may benefit.
- Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the role of the DSL, the schools Child Protection & Safeguarding Policy, Staff Behaviour Policy (Code of Conduct) Policy, Safe Working Practices Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection. See below for guidance:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.
- Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and Children's Social Care.
- All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.
- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (Child 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
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Body and Headteacher in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

8.2 The Headteacher

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

- The school fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and any deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a co-ordinated offer of Early Help when additional needs of children are identified
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.

- With the Designated Safeguarding Lead ensure adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes, and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff, supply staff or volunteers are dealt with in accordance with guidance from Department for Education (DfE) and Merton Children's Safeguarding Partnership.
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

8.3 The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in the school and this responsibility is not able to be delegated.
- Liaise with the Local Authority, the three safeguarding partners and work in partnership with other agencies in line with Working Together to Safeguard Children.
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, following the Prevent Referral Process. If the matter is urgent, the Police must be contacted.
- The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the "case manager" and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE guidance on 'Peer on Peer Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.

- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Follow DfE and KCSIE guidance 'Peer on Peer Abuse' and the school's Child protection and safeguarding Policy when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training must be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of Merton Children's Safeguarding Partnership procedures and understand the assessment process for providing Early Help and statutory intervention, including the local authority Family Wellbeing Model and referral arrangements.
- Have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where intervention is appropriate.
- Understand and support the school delivery with regards to the requirements of the Prevent Duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCo) on matters of safety and safeguarding .
- Be alert to the specific needs of a Child In Need, those with SEND and Young Carers.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that includes all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken.

- Ensure that when a pupil transfers school, their Child Protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a pupil transfers school and is on a Child Protection Plan or is a Looked After Child, their information is passed to the new school immediately, using the Child protection file, CPOMs if available at the transition school, and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed.
- Work with the DSL team, local authority and social workers to make informed decisions in the best interests of the child, for instance the child's safety, educational outcomes and welfare. This should be a matter of routine. Furthermore, the social worker and the DSL need to work together to respond to unauthorised absences etc., and promote welfare.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and SLT to ensure that relevant members of staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Report to the headteacher any significant issues for example use of the MCSP multi-agency escalation procedures enquiries under section 47 of the Children's Act 1989 and police investigations.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Ensure that all staff, within 3 months of employment at Ursuline High school and updated once a year thereafter, sign to say they have read, understood and agree to work within the school's Child Protection Policy, Staff Behaviour Policy (Code of Conduct) and Keeping Children Safe in Education (KCSIE) Part 1 and annex A and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training, following the training guidance published by the London Borough of Merton Safeguarding in Schools Officer, and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.

- Will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2020.

8.4 The Deputy Designated Safeguarding Lead(s):

In addition to the role and responsibilities of all staff each Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

8.5 The Safeguarding Team

The Safeguarding team meet weekly to review students who are on the CP/CIN/LAC/Mental health concerns or at risk. Additionally there is a strategic team that look at the strategy for safeguarding on a weekly basis and discuss the role of the pastoral support and review and evaluate the impact we are having as a team and the involvement of multiagency work.

8.6 The Governing Body

All members of The Governing Body understand and fulfil their responsibilities to ensure that:

- The school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a safeguarding response to children who go missing from education. Ensure policies are consistent with Merton Children's Safeguarding Partnership and statutory requirements, are reviewed annually and that the Child Protection Policy is available on the school website.
- That the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- That at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2020) part 1 and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

- That all staff including temporary staff and volunteers are provided with the school's Child Protection Policy and Staff Behaviour Policy.
- That the school has procedures for dealing with allegations of abuse against staff (including supply staff and the Headteacher), volunteers and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- That a Designated Governor for Safeguarding is identified.
- That a member of the Senior Leadership Team has been appointed by the Governing Body as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and deputies undertake DSL New to Role and then 'Update' training every two years as well as attending DSL network events and meetings.
- That children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through relationship and sex education (RSE).
- That the school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- That appropriate online filtering and monitoring systems are in place.
- Enhanced DBS checks are in place for all Governors.

8. 7 Multi-agency Working

School has a pivotal role to play in multi-agency safeguarding arrangements. The Governing Body, SLT and DSLs need to ensure that the school contributes to the multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018. Agencies will work together to safeguard and promote the welfare of children, including identifying and responding to their needs.

9. Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#).

Information will be shared with staff within the school who 'need to know'.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must also be aware of the provisions in the school's current Data Protection and Subject Access Request Policy.

10. Child Protection Procedures

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, Special Educational Needs and with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information related to the concern using CPOMs
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries identified on a body map
 - Explanations given by the child / adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child
5. Any paper records must be signed and dated by the author. The record needs to be completed by the adult who received the information.
6. In the absence of the DSL or the deputies, staff must be prepared to refer directly to the MASH, and the police if appropriate, if there is the potential for immediate significant harm.

10.1 Report of Concerns

Following a report of concerns the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the MASH and the police if it is appropriate.

2. Try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the MASH. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
3. Contact the MASH If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify MASH of the occurrence and what action has been taken
4. Contact the MASH If the DSL feels unsure about whether a referral is necessary to discuss concerns.
5. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider Early Help.
6. Arrange to take the child to the Accident and Emergency Unit of the local hospital when a pupil is in need of urgent medical attention, and if there is suspicion of abuse the DSL or their Deputy must inform the MASH. The DSL should seek advice about what action the MASH will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

11. Dealing with disclosures

All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff must know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the MASH or Police directly and must do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

Talking to and listening to children

If a child chooses to disclose, you SHOULD:

- Listen and reassure
- be accessible and receptive
- listen carefully and uncritically at the child's pace
- take what is said seriously
- tell the child that you must pass this information on
- explain what will happen next

- make a careful record of what was said in the child's words
- sign, date and record the time on records

You should NEVER:

- take photographs of injuries
- examine marks/ injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse – never ask leading questions
- make promises to children about confidentiality or keeping 'secrets'
- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about people allegedly involved
- forget to record what you have been told
- delay or fail to pass the information on to the correct person
- ask a child to sign a written copy of the disclosure or a 'statement'.

For children with communication difficulties or who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

11. 1 What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. Ensure the incident is recorded.

If they have concerns that the disclosure has not been acted upon appropriately, they must inform the Headteacher or Safeguarding Governor of the school and/or may contact the MASH.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

11.2 Record Keeping and Monitoring

- The Ursuline High School staff will make timely and accurate recording of safeguarding concerns raised about a child in the school. Our staff will be supported to understand the importance of timely, comprehensive and accurate recording in line with messages from serious case reviews on issues of recording and sharing information.
- We will follow the Local Authority's current guidance on the Record Keeping Guidance of Child Protection Records for schools (including guidance on transfer and storage - July

2018) and await any instruction with regard to the National Inquiry into Child Sexual Abuse. We will therefore not destroy any child protection/welfare records including records which hold information on allegations against staff and any other person working in the school or connected to the school.

- A recording of each and every episode/incident/concern/activity regarding that child, including telephone calls to other professionals, needs to be recorded on a chronology kept within the confidential file for that child on CPOMS. This will include any contact from other agencies who may wish to discuss concerns relating to a child. Actions will be agreed and roles and responsibility of each agency will be clarified and outcomes recorded. The chronology will be brief and log activity; the full recording will be on the record of concern. Recordings of safeguarding concerns will be kept on CPOMS. Written records of concern will be made on CPOMS even where there is no immediate need to refer to Children's Social Care. The concern file will be securely stored away from the main pupil file. The main pupil file will be marked with a **red sticker** in the top right-hand corner to denote a separate file exists. A 'concern' file will be started in the event of a child welfare concern being submitted on CPOMS to the DSL.
- Records will be kept up to date and reviewed regularly by the Safeguarding Team to evidence and support actions taken by staff in discharging the school's safeguarding arrangements. Original notes will be retained as they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.
- Staff members recording concerns about a child may not keep copies of electronic recordings made. All recordings must be sent via CPOMS to the DSL who will store them securely in the child's 'concern' file.
- The concern file can be active or non-active in terms of monitoring i.e. a child is no longer LAC, subject to a child protection plan and this level of activity can be recorded on CPOMS as a start and end date. If future concerns then arise it can be re-activated and indicated as such on CPOMS and on the chronology as new information arises.
- If the child moves to another school, the concern file will be securely sent or taken, as part of the admission/transition arrangements, to the DSL at the new establishment/school. There will be a timely liaison between each school DSL for Safeguarding to ensure a smooth and safe transition for the child.
- We will follow the Local Authority's current guidance and system for the secure transfer of school files between primary and secondary school. This ensures that child protection files are transferred to the new school as soon as possible, using a secure method and that confirmation of receipt is obtained. When receiving files, the school ensures that key staff such as the DSL and SENCO are aware as required. Where a child transfers to another education setting at any other time, the same principles are followed.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

12. Allegations against adults who work with children

Procedure

This procedure must be used in all cases in which it is alleged a member of staff, supply staff or volunteer in a school, or another adult who works with children has:

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

In dealing with allegations or concerns against an adult, staff must report any concerns about the conduct of any member of staff, supply staff or volunteer to the Headteacher immediately.

If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Headteacher or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Headteacher or Chair of Governors they will contact the LADO immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care via the MASH and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from Local Authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2020) and the Merton Children's Safeguarding Partnership procedures.

When using an agency for supply staff, the school will inform the agency of its process for managing allegations.

Where an allegation is made against a member of supply staff, the Headteacher will immediately contact the LADO. The school will ensure that any allegations are dealt with appropriately and liaise with relevant parties. The school will continue to support any investigation that is required.

13. What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, subjected to Honour Based Abuse, Forced Marriage or Female Genital Mutilation.

13. 1 What is abuse and neglect?

Abuse and neglect are forms 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 a stranger. They may be abused by an adult or adults, or another child or children.

13. 2 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Any mark or noticeable bruise on the body of a child must be noted on a Body Map.

13. 3 Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

13. 4 Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

13. 5 Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)

- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

13. 6 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 online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

13. 7 Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching

- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

13. 8 Neglect

Neglect is 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)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

13. 9 Indicators of abuse

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff must be discussed with the DSL.

14. Sexual violence and sexual harassment between children in schools

14. 1Peer on Peer Abuse

- In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Ursuline High School recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19’ i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences.

The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2020)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

We will minimise the risk of peer on peer abuse by:-

- Taking a whole school approach to safeguarding & child protection through a safeguarding curriculum
- All staff being trained and highly vigilant and aware of specific characteristics which may indicate peer on peer abuse e.g. vulnerability and controlling behaviour
- Providing a values based curriculum, underpinned by the school’s Positive behaviour policy and pastoral support; and by a planned programme of evidence based content delivered through the curriculum.
- Working in partnership with parents and carers
- Engaging with specialist support and interventions.

14. 2 Responding to reports of sexual violence and sexual harassment

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will inform the DSL or a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to the MASH.
- See Appendix F For schools Reporting and recording

14. 3 Risk Assessment:

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis. A log of all incidents will be kept by the DSL and reporting to SLT, SG strategic meeting and governors.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from Ian McGraw, Safeguarding in Schools Officer, email: Ian.McGraw@merton.gov.uk

14. 4 Action: The DSL will consider:-

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.

- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.

Other related issues or wider context.

14. 5 Options:

- Manage internally
- Early Help intervention
- Refer to MASH
- Report to the police (generally in parallel with a referral to MASH)

14. 6 Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Merton Children's Services.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected children & adults will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

14. 7 Physical Abuse

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2018](#)

15 and 16. Harmful Sexual Behaviour and Brook Traffic light system

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The school recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

17. Anti-Bullying/Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with, and analysed by the governing body. All staff are aware that children with SEND and/or differences/ perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.

PHSE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

18. Online Safety

- The school has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents. We follow the 'Teaching online safety in school; Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects ([Teaching Online Safety in Schools, June 2019](#)) to guide practice.
- Children increasingly use electronic equipment, including at home, on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, Snapchat and Voodoo and for online gaming.
- Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.
- Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders
- Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.
- The governing body ensure that appropriate filters and monitoring systems are in place. This is to ensure that children have access to 'safe' information and that 'over blocking' does not restrict access to their learning. Government supported online safety websites provide information to support governing bodies to keep children safe online (including when children are at home). Please see below list of links on the section entitled "**Further advice on safeguarding and child protection is available**" for guidance and information. We have a named Online Safety Leader and a system to log any Online Safety incidents.
- We ensure that monitoring systems are in place using a program from the London Grid for Learning, which is checked weekly by the Headteacher and any actions taken.

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

- cause harm,
- disrupt teaching,
- break school rules,
- commit an offence,
- cause personal injury, or
- damage property.

Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including pornographic images of children, without deleting them.

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's behaviour policy. The school follows DFE '[Searching, screening and confiscation at school](#)' guidance.

19. Racist Incidents

Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

20. Radicalisation and Extremism

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. ([Revised Prevent Duty Guidance for England and Wales 10 April 2019](#)).

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to the MASH. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or contact the Anti-terrorism hotline on 0800 789 321.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

20.1 Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
- or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

- Special Educational Needs and Disability – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Extremist activity can also be reported via the **Anti-Terrorist Hotline on 0800 789 321**. The line is confidential, anonymous and intended for the reporting of non-life threatening activity.

21. Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships, including impacting upon their own personal, intimate relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The school is enrolled onto the Operation Encompass scheme, a joint project between the Metropolitan Police Service and Merton Schools; where our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

21. 1 What should I do if I suspect a family is affected by domestic abuse?

To talk through your concerns, call the MASH or talk to your local outreach service.

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

Child Sexual Exploitation and Child Criminal Exploitation are forms of child abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child in sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources. In some cases the abuse will be in exchange for something the victim needs or wants and 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 one off occurrences or a series of incidents over time. It can 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 to be consensual and exploitation as well as being physical can be facilitated and/or take place online.

All staff are aware of the link between online safety and vulnerability to exploitation.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The School is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

The school is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The school includes the risks of sexual exploitation in the SRE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)

- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

23. Child Criminal Exploitation & Gangs

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity with children being exploited to move and store drugs and money. "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". Children might be involved in violence, be pressured into doing things like stealing, carrying drugs or weapons or be abused, exploited and put into dangerous situations

Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to the MASH will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the MASH. If there is concern about a child's immediate safety, the Police will be contacted on 999.

24. Children at Risk or Involved in Serious Violent Crime

Serious Violent Youth Crime' is defined by the Home Office Assessment of Policing and Community Safety (APACS) as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19'

Indicators:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

25. Youth Produced Sexual Imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- Voyeurism Act 2019 – Upskirting is now a criminal act in the UK. The response to this in schools need to be the same as peer on peer sexual abuse and may include contacting the

police. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders. "

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without referral to the MASH or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.
- Voyeurism occurred.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the MASH or the Police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

26. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in school who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that: FGM brings status/respect to the girl – social acceptance for marriage

- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

This procedure is also known as cutting, sunna, gudnin (Somali) and Tahur (Sudanese)

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM: Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

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

27. Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the MAP and/or the Forced Marriage Unit 2007.

28. Honour-Based Abuse

Honour Based Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. They are a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour-Based Abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

29. One Chance Rule

All staff are aware of the 'One Chance' Rule in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance to speak to a child who is a potential victim and have just one chance to save a life.

The school are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

30. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The school recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the MAP.

31. Looked After Children (LAC)

The most common reason for children becoming looked after is as a result of abuse and neglect.

The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The Designated Teacher and governor for Looked After Children will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher for Looked After Children and the DSL have details of the child's social worker and the name and contact details of the Merton Council's Head of Virtual School.

The Designated Teacher for Looked After Children and Previously Looked After Children will work in partnership with the Virtual School Assistant Headteacher to discuss how Pupil Premium Plus funding can be best used to support the progress of children in the school and meet the needs of the child's within their personal education plan.

32. Contextual Safeguarding

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from influences outside of their families. The school recognises that these extra-familial threats might arise from within their peer groups, from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats. At the Ursuline our Contextual Safeguarding indicators for Autumn 2020 are

Domestic Violence

Drugs and alcohol

Online safety and peer or peer abuse online

Gatherings

Other areas to be aware of are :

- exploitation by criminal gangs and organised crime groups such as county lines
- trafficking
- sexual exploitation
- extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials.

Staff are trained on contextual influences and follow the school procedures for reporting concerns. Any concerns regarding supply staff should be referred immediately to the Head teacher

33. Children with Special Educational Needs and Disabilities

The school recognises that children with Special Educational Needs (SEN) and Disabilities can face additional safeguarding challenges. Additional barriers that can exist when recognising abuse and neglect in this group of children include:

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

The school addresses these additional challenges by considering extra pastoral support for children with SEN and disabilities.

34. Children Missing Education

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

The school recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible the school will hold more than one emergency contact number for each pupil.

The school will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006.

The school will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006](#).

When removing a child's name, the school will notify the Local Authority of:

- (a) the full name of the child,
- (b) the full name and address of any parent with whom the child normally resides,
- (c) at least one telephone number of the parent,
- (d) the child's future address and destination school, if applicable, and
- (e) the ground in regulation 8 under which the child's name is to be removed from the school register.

The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006](#).

The school will:

- Enter pupils on the admissions register on the first day on which the school has agreed, or has been notified, that the pupil will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the Merton Council procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

Where parents notify the school, in writing, of their intention to electively home educate the school will forward a copy of the letter to the Elective Home Education Team / Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the school will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

35. Pupils Missing Out of Education

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education, because they are not accessing their education in school in the 'usual way'.

Where children are educated offsite or in dual placements safeguarding risk assessments are completed.

The school will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable

The school will ensure that and parents (and the local authority where the pupil has a statement of special educational needs) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

The school will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it;

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child

The school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The school leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

The school leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

36. Children who need the support of a Social Worker

Children may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances. These experiences can leave children vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The local authority should inform the school if a child has a social worker, and the DSL should hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

See <https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need>

37. Education at Home

Where children are being asked to learn online at home the advice from the government will be followed using the latest version of [Covid 19 Safeguarding in Schools guidance](#) and [Safeguarding and Remote Education](#)

38. School Attendance and Behaviour

Additional policies and procedures are in place regarding school attendance and behaviour.

The school recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The school will work in partnership with Merton Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

39. Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in “Positive Options” techniques. see Positive behaviour policy in Appendices

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given ‘Safe Practice’ guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

40. Mental Health

School has an important role to play in supporting the mental health and wellbeing of our pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although it is only appropriately trained professionals who can diagnose mental health problems, staff observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking with one of the school’s DSLs. School has access to a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. School has access to the Mental Health and Behaviour in Schools Guidance (<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>)

41. Health (including Mental Health)

Any child with a significant health condition requiring regular medication or treatment will require a **personal health care plan** which will be completed with the parent and school nurse. It is vital that parents inform us if their child has a health condition of this nature to enable us to ensure that their child’s health needs are managed appropriately whilst they are at school. Information from this plan will be shared with key staff members to ensure that they are alert to the child’s individual needs.

Current research suggests that one in ten children aged between 5 and 16 years has a mental health problem, and many continue to have mental health problems into adulthood.

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one
- Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education
- Staff should take action on any mental health concerns that are also safeguarding concerns, following the school's child protection policy and speaking to the DSL or deputy

Early interventions, particularly with vulnerable children and young people, can improve lifetime health and wellbeing and prevent mental illness.

Ursuline High School recognises that all children need the foundation of positive mental health to benefit fully from all of the opportunities available to them and that Schools have an important role to play in supporting the mental health and wellbeing of their pupils

Mental Health is how we feel, how we think and how we behave. Mental Health Promotion for children and young people is everybody's business. It is about:

- Being able to form and maintain relationships with others
- Being adaptable to change and other people's expectations
- Being able to have fun
- Being open to learning
- Being able to develop a sense of right and wrong
- Being able to develop the resilience to manage ordinary setbacks

At Ursuline High School we promote a mentally healthy environment where parents and carers:

- Are recognised for their significant contribution to children and young people's mental health
- Are welcomed, included and work in partnership with agencies
- Are provided with opportunities where they can ask for help when needed
- Are signposted to appropriate agencies for support
- Are clear about their role in working in partnership with the school
- Opinions are sought and valued and responded to.

Our school provides opportunities which promote positive mental health through:

- Daily Tutor time with the Use of the Wellbeing activities in the planner
- Theme for Autumn is Connect
- Use of School counselor
- Referral to Educational wellbeing practitioners
- Equalities and Diversity work including student voice
- Wellbeing Coordinator
- Mental Health First aiders
- The use of values education and restorative justice materials in PSHE studies.
- Differentiated learning activities
- Ours school ethos of Serviam and Theme of "Hope" in 2020
- Challenging stereotypes
- Targeted additional intervention
- Rewards and celebrations
- Close links with outside agencies such as CAMHS, Children's Services and School Health
- A broad and balanced curriculum
- Home/School links

Governing boards should ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems

42. Whistle-blowing and Complaints

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential

failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Whistle-blowing regarding the Headteacher should be made to the Chair of the Governing Body, whose contact details are readily available to staff by contacting the Clerk to the Governors, through the school office or emailing the Chair of the Governing Body directly on .

42. 1 Complaints procedure

Our complaints procedure will be followed where a parent raises a concern about the handling of the process of dealing with safeguarding. The school's complaints policy is on the school's website. Examples include unfairly singling out a pupil, belittling a pupil or discriminating against them in some way. Complaints are managed by senior staff, the Headteacher and governors.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Appendix A

Further advice on safeguarding and child protection is available from:

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

[UK Councils support sites](#)

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

Statutory Guidance to Relationships, education and sex education (RSE) and health education (2020)

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

OFSTED publication on safeguarding during inspections <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

UK Council for Internet safety (UKCIS) guidance: <https://www.gov.uk/government/publications/education-for-a-connected-world>

Additional advice and support

Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website

Bullying

- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- [Preventing and Tackling Bullying](#) - DfE advice
- [Cyber bullying: advice for headteachers and school staff](#) - DfE advice

Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and HO guidance

Drugs

- [Drugs: advice for schools](#) – DfE and ACPO advice
- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [ADEPIS platform sharing information and resources for schools: covering drug \(& alcohol\) prevention](#) - Website by Mentor UK

“Honour Based Abuse” (so called)

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance

Health and Well-being

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

Homelessness

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

Online

- [Sexting: responding to incidents and safeguarding children](#) - UK Council for Internet Safety

Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools](#) and childcare providers - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Upskirting

- [Upskirting know your rights](#) – UK Government

Violence

- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#) - DfE advice

- [Serious violence strategy](#) - Home Office Strategy

Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
- [NSPCC](#) provides advice on all aspects of a school or college's online safety arrangements
- [Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on [sexting-in-schools-andcolleges](#) and [using-external-visitors-to-support-online-safety-education](#)

Remote education, virtual lessons and live streaming

- [Case studies](#) on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) guidance on how to set up and use video conferencing
- [UK Safer Internet Centre](#) guidance on safe remote learning

Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse

Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world

- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- [Lucy Faithfull Foundation StopItNow](#) resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- [Parent info](#) from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online

Appendix B - Positive Behaviour Support Policy

Aim

This policy aims to outline how staff can promote positive relationships amongst students, avoid challenging behaviour and if necessary, manage behaviour that poses a risk to a student, or themselves and should be used in conjunction with other school policies listed in Appendix A in full policy.

Context

We recognise the need to adopting a whole school approach to building relationships in order to best support positive behaviour (See Appendix B.1 in full policy) and that challenging behaviour can be an expression of underlying needs, which should be addressed with appropriate support (see Appendix B.2 in full policy). Appropriate touch is a necessary part of school life, in creating a safe environment where student develop their emotional health and wellbeing (see Appendix B.3 in full policy) and physical intervention may be needed (see Appendix B.5 in full policy) **as a last resort, with the least amount of force, for the least amount of time necessary**, to ensure the safety of students (see Appendix B.6 in full policy). Any use of restrictive physical interventions would need to be in the best interest of the child and be reasonable and proportionate in order to be lawful. All forms of physical punishment are strictly forbidden and there should be no physical response to misbehaviour unless it is by way of restraint. Any searching or confiscation of prohibited items is undertaken in line with our Prohibited Items Policy (see Appendix B.4 in full policy) and can be carried out by the Headteacher or by the associate Headteacher accompanied by a female staff member.

Staff Guidance

To avoid misunderstandings, staff are advised when speaking to a student on their own, to use rooms with glass panels or have the door ajar, have another adult present where possible and on no account be in a locked room with a student.

If physical contact is appropriate, be clear that is a response to the student's needs and no more and would be understood as appropriate by an observer. When administering medical treatment, unless in an emergency, the door must be open and must always be treated by a female member of staff and if a student is required to remove clothing from, or provide access to, any part of the body normally considered private, then an adult chaperone must be present. Staff must not make unnecessary comments, which may be construed as having sexual connotations, in line with the Staff Code of Conduct. If a member of staff feels their actions have been or may be misconstrued, they should discuss the matter urgently with the Headteacher and/or Designated Safeguarding Lead.

Before physical intervention, staff will:

- Remain calm and attempt to engender calm
- Tell the student to stop and explain to them what will happen if they do not
- Use a range of non-physical interventions aimed at calming or defusing situations in order to prevent further escalation (See Appendix B.7 in full policy)

Whilst physical intervention, staff will:

- Use the minimum amount of force required to achieve the desired outcome
- Tell the student that physical restraint will stop as soon as it ceases to be necessary
- Continue to use a range of non-physical interventions aimed at calming or defusing situations in order to prevent further escalation (see Appendix B.7 in full policy).

Reasonable force

The degree of force employed by staff must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Staff are not permitted to act in a way that might cause injury (see Appendix B.8 in full policy).

Training

All teaching and support staff have training on building positive behaviour management in the classroom or around school, as part of annual whole staff INSET, as well as ongoing input throughout the year. The Senior Leadership Team have further annual training on physical intervention and reasonable force, so they can support staff in challenging situations.

Recording incidents

All incidents where physical restraint has been necessary are recorded within one working day using the template provided by Merton (See Appendix C in full policy) and the Headteacher is informed immediately. Statements from students concerned are taken and parents/carers are informed. (See Appendix C in full policy).

Complaints

In line with our complaints procedure, any concerns expressed by parents will be dealt with in the first instance with informal discussion with the Headteacher. If dissatisfied, the parent may then submit a formal complaint to the Headteacher, in writing, explicitly stating that it is a formal complaint and specifying the nature as exactly as possible. If the parent is still dissatisfied with the response, we ask parents to refer the matter to the Governing Body via the clerk. (See Complaints Procedure and Safeguarding Policy).



January 2021

This is an addendum to Ursuline High School Child Protection and Safeguarding Policy in response to the Coronavirus (Covid-19) outbreak. This policy will be under constant review as guidance and information will change.

This addendum replaces all previous versions.

This additional policy should be read alongside the school or college Child Protection and Safeguarding Policy and the following Department of Education and Gov.uk guidance [Children of critical workers and vulnerable children who can access schools or educational settings](#)

This is in response to the Cabinet Office and Department of Education instruction issued on 4th January 2021 [National lockdown - stay at home](#), and all primary, secondary and colleges to move to online learning.

In addition, and as before during previous lockdowns, schools will remain open for Vulnerable Children from all year groups and whose parents are “critical workers”.

Critical Workers are parents whose work is critical to the coronavirus (COVID-19) and EU transition response include those who work in health and social care and in other key sectors. Children with at least one parent or carer who is a critical worker can go to school or college if required.

Vulnerable children are defined as those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a child in need plan, a child protection plan or who are a looked-after child;
- have an education, health and care (EHC) plan;
- have been identified as otherwise vulnerable by educational providers or local authorities (including children’s social care services), and who could therefore benefit from continued full-time attendance, this might include:
 - ❖ children and young people on the edge of receiving support from children’s social care services or in the process of being referred to children’s services
 - ❖ adopted children or children on a special guardianship order
 - ❖ those at risk of becoming NEET (‘not in employment, education or training’)
 - ❖ those living in temporary accommodation
 - ❖ those who are young carers
 - ❖ those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
 - ❖ care leavers
 - ❖ others at the provider and local authority’s discretion including pupils and students who need to attend to receive support or manage risks to their mental health.

Eligibility for free school meals in and of itself is not a determining factor in assessing vulnerability. Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children’s social care support.

Ursuline High School will continue to work with and support children’s social workers to help protect vulnerable children. This includes working with and supporting children’s social workers and the Merton Virtual School for looked-after and previously looked-after children.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and Michelle Alexander (DSL) will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, Head of Year or a member of the pastoral team/safeguarding team or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Ursuline High School will encourage our vulnerable children and young people to attend a school, including remotely if needed.

The **Multi Agency Safeguarding Hub (MASH)** will continue to function as normal.

First Response will conduct face to face visits with all new cases. Subsequent visits may be held virtually.

Attendance

Ursuline High School will comply with the guidance issued in January 2021 by the Department of Education

[Restricting attendance during the national lockdown: schools](#)

Vulnerable children's attendance is expected, where it is appropriate for them (that is, where there are no shielding concerns for the child or their household, and/or following a risk assessment for children with an EHC plan), so that they can gain the educational and wellbeing benefits of attending. Vulnerable children – regardless of year group – that have not been attending in the recent period are expected to return to school or college provision where this would now be appropriate for them to do so.

Vulnerable Children who have a social worker are expected to attend unless the child/household is shielding or clinically vulnerable.

Vulnerable Children who have an EHCP, attendance is expected where it is determined, that their needs can be as safely or more safely met in the school or college.

Vulnerable Children who are deemed otherwise vulnerable, at the school, college or local authority discretion, attendance is expected unless the child/household is shielding or clinically vulnerable.

The Headteacher of the Merton Virtual School must be informed in relation to all children who are "Looked After"

Ursuline High school will continue to inform social workers where children (with a social worker) do not attend. We will continue to follow up with any parent or carer of a child who is expected to attend and fails to do so.

Designated Safeguarding Lead

Ursuline High school has a Designated Safeguarding Lead (DSL) and a Deputy DSL.

The Designated Safeguarding Lead is: Michelle Alexander

The Deputy Designated Safeguarding Lead (S) is: Rachael Gilmore

A trained DSL (or deputy) will be available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection online management system CPOMS and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

All school named staff and volunteers will have access to a trained DSL (or deputy). On each day staff on site will be made aware of who that person is and how to contact them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely or may be virtual, for example via Zoom or Skype.

If the DSL is nearing or is over the 2 yearly statutory update, for these emergency provisions, that DSL may continue in their duty.

If a school does not have a DSL due to sickness or staff in self-isolation, assistance can be sought from a nearby school or cluster group of schools to provide DSL cover.

The DSL will ensure that all CP records relating to a child attending another setting will be communicated and transferred if necessary. It is recommended that both settings discuss any concerns involving a Vulnerable Child. This will include access to CP Plans, EHCPs or Personal Education Plan if the child is "Looked After".

Reporting a concern

If staff do receive an allegation of abuse or harm, then they must follow the procedure detailed in the main Child Protection and Safeguarding Policy. All allegations of abuse or harm must be recorded, signed, dated and timed and passed immediately to the DSL or Deputy DSL.

If any member of staff has a concern about an adult working in the school, they must immediately inform the Headteacher. If the concern is about the Headteacher, then the Chair of Governors must be informed.

The Headteacher, on receipt of an allegation against a member of staff, will contact the Local Authority Designated Officer, John Shelley (Tel: 020 8545 3187. Email: lado@merton.gov.uk) immediately.

Peer on Peer Abuse

Any reports of peer on peer abuse must be followed up as set out in Part 5 of Keeping Children Safe in Education 2020 and in the specific section of the Child Protection and Safeguarding Policy. School staff have received training on “peer on peer” abuse in accordance with part 5 of Keeping Children Safe in Education 2020. All reports of incidents must be reported to the DSL, and subsequently the MASH in accordance with the multi-agency safeguarding arrangements. School staff therefore need to be mindful of any conflicts that may arise or the identification of Vulnerable Children.

Safeguarding Training and Induction

Any new staff recruited during these emergency procedures will require safeguarding induction in line with Keeping Children Safe in Education 2019 which includes receiving:

- Part 1 of KCSiE 2020
- A copy of the Child Protection and Safeguarding Policy including this addendum,
- A copy of the Staff Code of Conduct/ Staff Behaviour Policy
- A copy of the School Behaviour Policy, and
- The Safeguarding response to Children who are missing education.

The induction will also include a meeting with the Designated Safeguarding Lead to understand his/her role.

All staff will require to be made aware of safeguarding updates during the emergency period.

Safer Recruitment including the movement of staff

It is essential that all staff and volunteers who work in the school are subject to safer recruitment processes and vetting and this includes ensuring that unsuitable people are not permitted to enter the children's workforce or gain access to children. During this emergency period schools will continue to follow their policies and procedures set out in the Child Protection and Safeguarding Policy and part 3 of Keeping Children Safe in Education 2020.

The Disclosure and Barring Service (DBS) has made changes to its guidance to minimise the need for face-to-face contact.

We will continue to follow the checking and risk assessment process for volunteers as set out in paragraphs 183 to 188 of KCSiE 2020. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the Single Central Record (SCR) up to date as outlined in paragraphs 164 to 173 in KCSiE 2020.

All staff who may be working together in a hub/ cluster will not require to undergo a further DBS check. The SCR for the hub/ cluster lead school must include all new staff who are transferred from other schools.

Any member of teaching staff who is dismissed for serious misconduct will be reported to the Teaching Regulation Agency and any member of staff who is withdrawn from a role involving regulated activity for a safeguarding reason will be referred to the Disclosure and Barring Service.

Online Safety

During this lockdown period children will be spending more time online using remote learning, playing games and accessing social media.

We will continue to provide a safe environment for children both on and offline. Pupils will not be allowed to use personal computers, iPads and Chrome Books without supervision. Schools need to be particularly aware of online learning tools and systems in line with privacy and data protection/ GDPR requirements.

This school has Eforenics filtering on the network to ensure all online content is appropriate to the year group. Children who can access the school IT network remotely will also have the same security and filtering. This will be followed up the Safeguarding team and Head of year. Children who are using an approved device given to them to use at home during the period of lockdown will also have the same security and filtering settings.

Schools in Merton have access to resources supplied by the London Grid for Learning for children and families to help to keep them safe online.

The Data Protection Officer will be made aware of any new communications platforms. This will likely require a Data Processing Impact Assessment.

If Ursuline High School is using a tutor as part of the catch-up programme this can be done remotely and we will ensure that the tutor is aware of their safeguarding obligations of online teaching.

Supporting Pupils not in school

Children other than those who meet the definition of "vulnerable" will remain at home and through a communication plan staff will continue to contact them regularly. This is the Safeguarding team working with the Heads of Year and pastoral team to weekly update and rag rate the concerns (see flow diagram in Appendix)

The contact may involve speaking on the telephone with parents and with children themselves. At all times staff look out for any signs or indications that a child may be at risk and report this immediately to the DSL.

Staff will continue to monitor any remote learning that may involve logging on to online learning or submitting work on time. Any indications that children are not logging on must be followed up.

If the pupil is "looked after" liaison must be made with the Merton Virtual School.

Supporting Children in School

Ursuline High School is committed to ensuring the safety and wellbeing of all pupils and will continue to provide a safe space for all pupils to attend. The Headteacher will ensure that appropriate staff are onsite and staff to pupil ratio numbers are appropriate to maximise safety.

We will refer to Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of the spread of Covid-19. We undertake to care for the children of key/ critical workers.

If we have concerns about the impact of staff absence, for example, our DSL or first aiders we will contact the Local Authority.

Important Contact details

MASH 020 8545 4226

Elizabeth Fitzpatrick, Head of School Improvement 020 8545 3806 |07535 448600

Ian McGraw Safeguarding in Schools Officer 07961 808545

Safeguarding School Closure

Julia Waters-07545696060

Michelle Alexander- 07902340682/07735412171

Rachael Gilmore- 07870 657975

Using Key vulnerable Rag rated List(in Safeguarding teams)
PSA's to prioritise attendance calls 10—11am if they are not logged on and update MA if any concern. If concerns are Mental health response goes to RG and if concern is SEN then response to JD aswell. HOY also updated.



EHCP students contacted weekly by SENCO or HLTA and risk assessment with parent to agree if students should be at home or in school. SENCO to feedback at weekly safeguarding meeting



Welfare checks are carried out on Rag rated Vulnerable list are to be contacted twice a week if in red and once if in amber. The named key person named on sheet to call and then to add info to CPOMS and to Chronologies (all accessed in MS teams Safeguarding) SW also contacted to be kept informed on ongoing risk



DSL reports to JW daily at 11.30 to report any issues with vulnerable and attendance and SW to be contacted if appropriate.
Safeguarding team and PC Gunn to update MA and MA to update JW if any concerns arise. The SW/MASH will then need to be contacted.

- Safeguarding team have access to safeguarding overview with social worker details
- Attendance to CP/CIN/LAC conferences to be attended via dial or webconference

- HOY and have met with students to go through support (trusted adult, kooth, OTR, CAMHS/social worker numbers if appropriate etc) if school closure.
- Safeguarding meeting to happen online Thursday at 9.30

Esafe

- Possible large increase of esafe if many students using laptops.
- DD has laptop and phone
- Eforensic have DD new mobile number and MA number
- DD will ring parents for high alert concerns and log on CPOMS
- DD would email parents of lower concerns and ask they discuss with daughter. Will log action on CPOMS
- A summary of this will be presented at the Safeguarding meeting weekly.

Communication with students and parents

- RG to email all students with reminder of Kooth online support
- Leaflet for parents and families for wellbeing during self-isolation – Sara Rosenthal to provide RG with materials
- RG will send an email every week regarding Physical and emotional wellbeing to staff and students.

Ted talks schedule Autumn term 2020

Whole staff weekly briefing with safeguarding focus

14/09/2020	CPOMS and recording and reporting incidents
21/09/2020	Contextual Safeguarding
28/09/2020	Sexual Violence and Sexual Harassment-Peer on peer abuse
05/10/2020	Mental Health and systems
12/10/2020	Domestic Violence
19/10/2020	Anti Bullying and Cyber Bullying
02/11/2020	Young Carers
09/11/2020	Allegations against adults working with children
16/11/2020	LGBTQI
23/11/2020	Sexual Health Awareness/ Sexual violence/Sexual Harassment
30/11/2020	CME
07/12/2020	Prohibited items
14/12/2020	Child protection and referrals

Appendix E

Dealing with concerns or disclosures regarding a child or young person

1. If you are concerned a pupil has been subjected to Female Genital Mutilation (FGM) you must report this directly and immediately to the police. Also inform your DSL.

You have a concern about a child / young person's wellbeing, based on:

- a) Something the child / young person / parent has told you
- b) Something you have noticed about the child's behaviour, health, or appearance
- c) Something another professional said or did

Even if you think your concern is minor, the Designated Safeguarding Lead (DSL) may have more information that, together with what you know, represents a more serious worry about a child. - **It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.**

2. **Decide whether you need to find out more** by asking the child / young person, or their parent to clarify your concerns, being careful to use open questions: beginning with words like: how, why, where, when, who?
3. **Let the child / young person / parent know what you plan to do next** if you have heard a disclosure of abuse or you are talking with them about your concerns. Do not promise to keep what s/he tells you secret. You may say for example, *"I am worried about your bruise and I need to tell Miss Jones so that she can help us think about how to keep you safe"*
4. **Inform the DSL immediately via CPOMS.** If the DSL is not available, inform their Deputy. If neither is available, speak to the Headteacher or other member of the Senior Leadership Team. **If there is no other member of staff available, you must make the referral yourself. Anyone can make a referral, but where you make a referral without reference to the Designated Safeguarding Lead first, they must be informed as soon as possible.**
5. **Make a written record** as soon as possible after the event on CPOMS, noting:
 - a) Name of child
 - b) Date, time and place
 - c) Who else was present
 - d) What was said / What happened / What you noticed speech, behaviour, mood, drawings, games or appearance
 - e) If child or parent spoke, record their words rather than your interpretation
 - f) Analysis of what you observed and why it is a cause for concern
6. **The DSL may take advice** from the Multi-Agency safeguarding Hub (MASH)/First Response Team (020 8545 4226/4227) or other Children Social Care Team supporting schools safeguarding, such as the Vulnerable Children Team (020 8545 3343).
7. **The DSL makes the referral** to the MASH service. The referral will note all previous intervention by the school with the child, any relevant history relating to the child, their siblings or the family. It is not the role of the DSL or other staff in school to investigate or attempt to resolve a safeguarding/child protection concern.
8. **The DSL shares information** with other relevant professionals, recording reasons for sharing information and ensuring that they are aware of what action the other professionals will take as a result of information shared
9. **The DSL informs parent that they have made a CP referral**, if the parent does not already know, and if there is no reason not to let them know. There are a number of

scenarios where the MASH/First Response Team may suggest a delay in informing the parent where informing the parent might put the child at further risk or in order to prevent the child being harmed or intimidated (and retracting their disclosure). Such scenarios may be in cases of suspected sexual abuse or cases of suspected Fabricated or Induced Illness by proxy.

10. **The DSL remains in close communication** with other professionals around the child / young person and with the family, in order to share any updates about the child / young person
11. **If a child protection investigation is pursued**, the DSL and other key school staff will:
 - a) Work closely and collaboratively with all professionals involved in the investigation, to keep the child / young person safe
 - b) Attend a child protection conference when invited and provide updated information about the child
 - c) Attend any subsequent child protection review conferences.
 - d) Attend core group meetings and take an active role in the implementation of the protection plan.

Appendix F

Confidentiality

We recognise that all matters relating to child protection are confidential; however, a member of staff must never guarantee confidentiality to a pupil.

Where there is a child protection concern it will be passed immediately to the Designated Safeguarding Lead and/or to Children's Social Care.

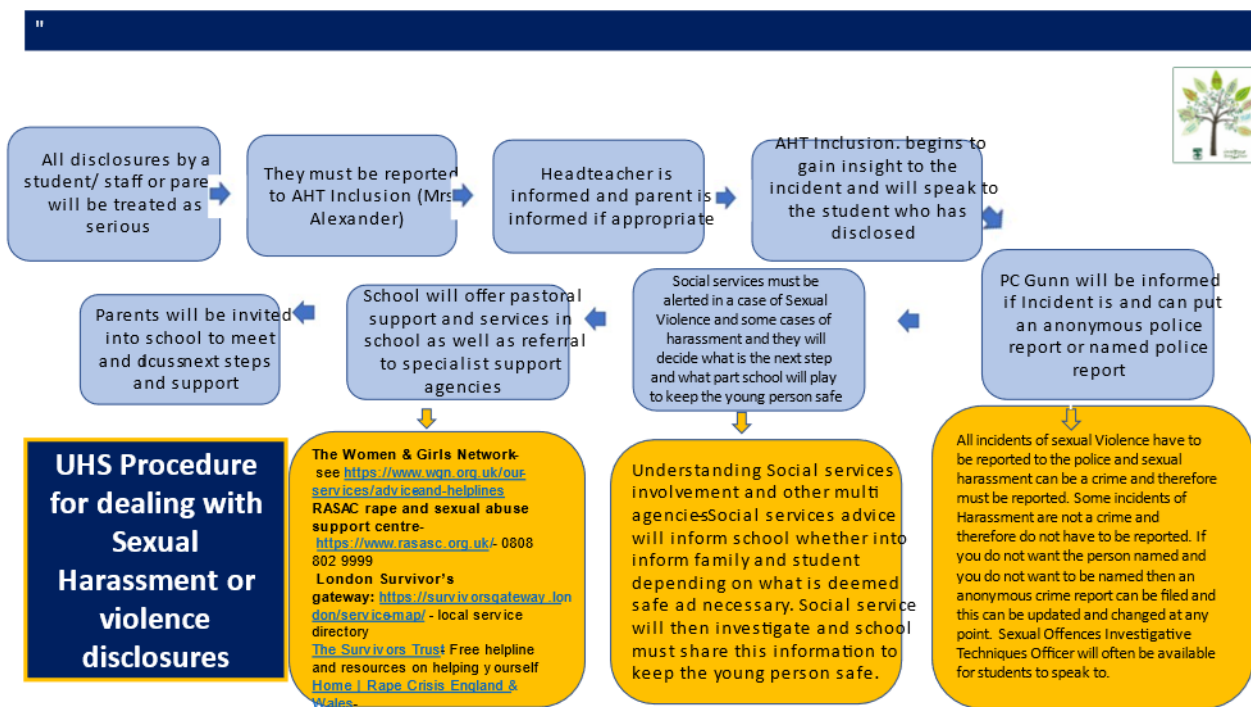
The head teacher or Designated Senior Person will disclose personal information about a pupil to other members of staff, including the level of involvement of other agencies, only on a 'need to know' basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

Appendix G: All allegations against an adult who w reported to the Designated Senior Person for safegua



Appendix F



Sexual Violence and Sexual Harassment between children in school and colleges Guidance Dec Summary

Sexual violence or sexual harassment can occur between 2 children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The guidance defines the following terms:

Sexual violence includes:

- rape
- assault by penetration
- sexual assault - intentionally touching another person in a way that is sexual.

Sexual Harassment:

The guidance defines sexual harassment as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity, and/or
- make them feel intimidated, degraded or humiliated and/or
- create a hostile, offensive or sexualised environment.

Harmful Sexual Behaviors:

- The guidance describes harmful sexual behaviours as problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if 1 of the children is much older, particularly if there is more than 2 years' difference in age or if one of the children is pre-pubescent and the other is not. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

Children who experience sexual violence and sexual harassment will likely find it stressful and distressing. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable.

School's legal responsibility:

Schools have a statutory duty to safeguard and promote the welfare of the students at their school. As part of this duty, schools are required to have regard to guidance issued by the Secretary of State.

The guidance states that schools should:

- consider the makeup of their own student body, including the gender and age range of its pupils, and whether additional support for students with protected characteristics - who are potentially at greater risk - is appropriate

- consider what they can do to foster healthy and respectful relationships between boys and girls including through relationship and sex education (RSE) and personal, social, health and economic education (PSHE)
- ensure that their response to boy on boy and girl on girl sexual violence and sexual harassment is equally robust as it is for sexual violence and sexual harassment between students of the opposite sex.

A whole school approach safeguarding and child protection

A whole school approach to preventing child on child sexual violence and sexual harassment means involving everyone in the school, including the governing body, all the staff, all the students and their parents or carers.

The school's approach to sexual violence and sexual harassment should reflect and be part of the broader approach to safeguarding. Safeguarding procedures with regard to sexual violence and sexual harassment should be transparent, clear and easy to understand for staff, pupils, parents and carers.

Schools can play an important role in preventative education. Through PSHE and SRE - which may tackle such issues as:

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

Managing the disclosure

The school's initial response to a disclosure from a child is important. It is essential that victims are reassured that they are being taken seriously and that they will be supported and kept safe.

The guidance outlines effective safeguarding practice including:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the disclosure will be progressed
- only recording the facts as the child presents them.
- informing the DSL, as soon as practically possible.

Risk Assessment

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

The risk and needs assessment should consider the:

- victim
- alleged perpetrator
- both other students and, if appropriate, staff at the school.

Actions:

The DSL is likely to have a complete safeguarding picture and be the most appropriate person to decide on the school's initial response. In all cases, schools should follow general safeguarding principles outlined in [Keeping children safe in education](#).

The guidance includes advice on students sharing a classroom following a report of sexual violence, sexual harassment and during a criminal investigation.