

ST BENEDICT'S SCHOOL
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Child Protection and Safeguarding Policy

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1. Introduction

This policy is available on the website and applies to all members of staff including volunteers and Governors. It has regard to [Keeping Children Safe in Education](#) (2025) (KCSIE), [Working together to Safeguard Children](#) (2023) (WT), and [Prevent Duty Guidance: For England and Wales](#) (July 2024) (Prevent) as well as a number of other documents outlined in appendix 7 of this policy.

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

A ‘Child’ is taken to be someone under 18 although of course the School will continue to fully support the welfare of all students when they become 18.

KCSIE makes the point that when defining ‘victim’ ‘it is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim.’ In addition, it notes that in using the term ‘perpetrator’ ‘schools and colleges should think very carefully about terminology, especially in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

1b) Key safeguarding contact details for this policy

Within School

Mr L Ramsden: Senior DSL (Senior School), Director of Safeguarding for the St Benedict’s Family of Schools and Senior Deputy Head (Senior School): 0208 862 2024 / 07388 611193

Mr M Foley: Assistant Head Pastoral and Deputy DSL in Senior School:

Ms A Yue: Senior School nurse and Deputy DSL in Senior School: 0208 862 2044

Ms L Powell: DSL for Key Stage 1 and 2 and Assistant Head: 0208 862 2056

Mrs M Edwards: DSL EYFS and Head of Early Years: 0208 862 2460

Ms A Loaiza Palacio: Senior School Counsellor, Mental Health Lead for Senior and Junior School

Mr R Simmons: Junior School Head and Deputy DSL: 0208 862 2054

Mr J Smith: Head of Senior School: 0208 862 2010

Mr A Chattarjee: Designated Safeguarding Governor: 0208 862 2075

Mr M Davis: Chair of Governors: 0208 862 2075

Mrs C Bedwin: Bursar and Clerk to the Governors: 0208 862 2183

Ms D Burke: Junior School Nurse: 0208 862 2060

External Agencies

Ealing

Local Area Designated Officer (LADO), Natalie Cernuda, asv@ealing.gov.uk, 07890 940 241

asv@ealing.gov.uk/child.protection@ealing.cjsm.net. Website: <https://www.egfl.org.uk/services-children/safeguarding/child-protection/staff-allegations>

Ealing Children’s Integrated Response Service (ECIRS): Perceval House, 2nd Floor Blue Area, 14-16 Uxbridge Road, Ealing, W5 2HL.Tel: 0208 825 8000 Fax: 020 8825 8000. ecirs@ealing.gov.uk. Website:

<https://www.egfl.org.uk/services-children/ealing-childrens-integrated-response-service-ecirs-referrals>

Family Information Service (FIS): Tel: 020 8825 5588. [EHAP@ealing.gov.uk/](mailto:EHAP@ealing.gov.uk) Website:

<https://www.egfl.org.uk/services-children/early-help-assessment-and-plan-ehap>

Prevent Coordinator: 020 8825 8895 (Office hours 9am-5pm). For non-emergency local police dial 101

Child Protection Advisors (CPA): Ealing Children's Social care advice: 020 8825 8930

Ealing Police: Safer Neighbourhoods team: [Contact your local policing team | Metropolitan Police](#)

Early Help Assessment and Plan (EHAP): 020 8825 5588 (Mon-Fri 9-5pm)

Ealing Service for Children with Additional Needs (ESCAN): Carmelita House, 21-22 The Mall, Ealing W5 6PJ; 020 8825 8700; carmelitahouse@nhs.net.

SAFE 0-18: Supportive Action for Families in Ealing: 020 8825 7606/ 020 8825 5080

Frank Jenkinson, School Attendance Service Manager: 020 8825 5973 fjenkinson@ealing.gov.uk

The Ealing Safeguarding Children Partnership with information and guidance can be found at:

<https://www.ealingfamiliesdirectory.org.uk/kb5/ealing/directory/escb.page?escbchannel=0>

National

Department for Education (DfE) helpline and mailbox: for non-emergency advice for staff and Governors: 020 7340 7264

Children Missing in Education: 020 8825 59447

London Safeguarding Children Board: www.londonscb.gov.uk

OFSTED: Piccadilly Gate, Store Street, Manchester, M1 2WD, 0300 123 1231, enquiries@ofsted.gov.uk

NSPCC: 42 Curtain Road, London, EC2A 2NH, 0808 800 500

Childline: 0800 1111

2. Staff Responsibility for Safeguarding

The Governors of St Benedict's have strategic leadership responsibility for safeguarding arrangements at the School to facilitate a whole school approach to safeguarding that involves everyone in the School so that it is at the forefront, underpinning all relevant aspects of process and policy development with the child's wishes and feelings always taken into account. All Governors have safeguarding training to equip them with the strategic understanding to work with the Head and Designated Safeguarding Leads (from here on DSLs), including an understanding of local arrangements with Ealing social services. This means they can assure themselves that there are clear safeguarding systems in place (including online safety and regularly reviewing effectiveness of filtering and monitoring systems), as set out in this policy that are well promoted, easily understood and easily accessible for children to confidently report abuse knowing their concerns will be treated seriously and that they can safely express their views and give feedback. The policy recognizes that while all children should be protected some groups of children are potentially at greater risk of harm.

KCSIE paras 81-91 makes explicit the obligations of Governors under the [Human Rights Act](#) (1998), [Equality Act](#) (2010) and [Public Sector Equality Duty](#). This reinforces their safeguarding duties, for instance noting that 'governing bodies...should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race' with a link to [Equality Act 2010: advice for schools](#).

Following this guidance St Benedict's School both in its policies and actions does 'take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need' – a phrase often summarized as

‘reasonable adjustments’ (KCSIE para 87). For the Public Sector Equality Duty ‘whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these...This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.’ See [Technical Guidance on the Public Sector Equality Duty](#).

All staff at the School know that Safeguarding and promoting the welfare of children is **everyone’s** responsibility. Staff in schools are in a particularly important position as they can identify concerns early on, provide help and prevent concerns from escalating. All members of staff at St Benedict’s have a responsibility to provide a safe environment in which children can learn, and in their actions they must always consider what is in the best interests of each student, working with a child-centered approach. Staff understand that children can be at risk of harm in school and out of school, at home or online. The wishes of the child will be taken into account when determining action to be taken and services to provide. Children are actively encouraged to raise concerns and are taught about safeguarding by covering relevant issues throughout their time at St Benedict’s both in our PSHE course, tutor time and, where appropriate, in academic lessons.

An addition KCSIE para 17 emphasizes that ‘staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected’ as ‘may feel embarrassed, humiliated or being threatened’ or ‘they may not recognise their experience as harmful.’ It states ‘This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.’ Staff training at St Benedict’s places great emphasis on developing this ‘professional curiosity’ and building relationships with children.

Perhaps most importantly, all staff must maintain an attitude of **‘it could happen here’** when it comes to potential safeguarding concerns. It is important that all members of staff play a part in identifying concerns, sharing information and taking prompt action so that all children receive the right help at the right time to address risks and prevent issues escalating. Data protection concerns should not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Serious case reviews show the dangers of failing to take effective action with poor practice including ‘failing to act on and referring to early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; not challenging those who appear not to be taking action.’ Safeguarding training includes understanding the importance of online safeguarding including understanding the Schools own filtering and monitoring system for computers and staff roles and responsibilities and respect of this (see Appendix 3).

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All school staff should be prepared to identify children who might benefit from pastoral support and with potential safeguarding concerns. Contextual safeguarding is emphasized in KCSIE. Staff, especially DSLs, need to be aware that safeguarding behaviours or incidents can be associated with factors outside school. Staff should always consider whether children are at risk of abuse or exploitation in these situations, particularly if happening outside their families. Extra-familial harms take a variety of forms, perhaps most obviously Child Sexual Exploitation and Child Criminal Exploitation as explained below.

Any staff member with concerns about a child’s welfare should pass on their concerns to a DSL, although they can make a referral themselves. Our staff are important in providing early help to students with safeguarding

issues so that as soon as a problem emerges then support will be provided as quickly as possible. Staff training ensures that they are aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989 - especially section 17 (children in need) and section 27 (children suffering harm). They are also trained to be aware of the different types of abuse and neglect so that they can identify cases of children who might be in need of help.

To ensure that all members of staff understand their safeguarding responsibilities Part 1 of Keeping Children Safe in Education (KCSIE) must be read by **all** staff (The Annex A condensed version is less comprehensive but may be used for members of staff who do not have such good English) and followed by the governing body and all staff (including volunteers) in the School. All staff are given a copy of this during their induction as well as the school's Child Protection and Safeguarding Policy (including policy and procedures to deal with child on child abuse), staff code of conduct (part of the Employment Manual including low level concerns, allegations against staff and whistleblowing, and the School's behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying) and attendance policy (including children missing education). Safeguarding training (including *Prevent* awareness and online safety) is also part of all staff induction which looks at the School safeguarding policy and the role of the DSLs. There is also annual training in safeguarding (including online safety) in place for all staff so that they can understand and discharge their safeguarding responsibilities as well as more regular updates (training/email/bulletins) through the year. Governors also receive appropriate child protection and safer recruitment training with refresher training every two years. Temporary, voluntary and new staff who work in school are given separate training if they have not attended the annual training at the start of the year. The HR department keep a central record of all safeguarding training undertaken by members of staff and others. With all training the Governors have regard to [Teachers' Standards](#) which set out the expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires all teachers to have a clear understanding of the needs of all pupils.

The Governors ensure, working with the Head and the heads of PSHE, that all students are taught PSHE in every year in a curriculum which teaches them about personal health and safety, safeguarding, online safety and Relationships and Sex Education. There is a separate PSHE policy on the School's website.

It is recognised that effective education is tailored to specific needs so children with particular vulnerabilities such as SEND or victims of abuse will be considered appropriately in how they are taught to give them a more personalized and contextualized approach, for instance with 1:1 support in some topics and being allowed to work separately when there are topics which might be difficult for them to participate in with the rest of their class. The statutory guidance on RSE is [here](#) and further resources can be found in paragraphs 129-131 of KCSIE. The PSHE curriculum is a key part of preventative education that ensures that St Benedict's has a culture of zero tolerance for 'sexism, misogyny/misandry, homophobia, biphobic and sexual violence harassment.' (KCSIE para 130). This is reflected in our behaviour and bullying policies and practice.

3. Types of Abuse, Neglect and Exploitation

Knowing what to look for is vital in the early identification of abuse and neglect. Further information can be found in [What to do if you are worried a child is being abused – Advice for practitioners](#). Staff should be particularly alert to potential need for support for a student who:

- Is disabled or has certain health conditions including mental health needs or/and has a Special Educational Need or Disability (SEND) (whether or not they have an Education Health and Care Plan).
- Is a young carer;

- Is a privately fostered child or has returned home to their family from care;
- Is at risk of being radicalized or exploited;
- Is frequently missing from home/not attending school including persistent absences for part of the School day;
- Is showing signs of being drawn into anti-social/criminal/gang behaviour and/or known to be misusing drugs or alcohol or involved in consensual and non-consensual sharing of nudes and semi-nudes images and/or videos;
- Is at risk of so-called honour-based abuse such as FGM or forced marriage;
- Has challenging family circumstances such as a family member in prison or an offender, adult mental health problems or domestic abuse or has returned home to their family from care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

In all cases, if staff members are unsure, they should always speak to one of the DSLs.

All staff should be aware that abuse, neglect and any safeguarding issues are rarely standalone events that can be covered by one definition and in most cases many issues overlap with each other. Safeguarding incidents can be associated with factors outside school, and all staff should consider whether children are at risk of abuse or exploitation in situations outside their families such as sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. In addition, staff should be vigilant for the fact that there could be domestic abuse occurring which can have a particularly serious, long-lasting, emotional and psychological impact. Advice on this can be found at [NSPCC – Domestic abuse](#).

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their other children online, this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Artificial intelligence systems significantly amplify the potential for online safeguarding concerns given its ability to manipulate images and create potentially dangerous or misleading content.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. It is important to note that abuse can be partly or entirely online as well as physical. It can also include the impact of witnessing ill treatment of others, particularly in cases of domestic abuse. Staff training ensures that staff are also aware that children are capable of abusing other children. Ensuring children are aware of forms of online abuse as part of their PSHE programme of study.

Possible signs of abuse include (but are not limited to):

- The pupil says s/he has been abused or asks a question which gives rise to that inference;
- There is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

- The pupil's development is delayed or they lose or gain weight;
- The pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- The pupil is reluctant to go home, or has been openly rejected by his / her parents or carers.
- The pupil is reluctant to go to school.

Physical Abuse: This 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.

Possible signs of Physical Abuse include:

- Children may seek to conceal such injuries by keeping their arms and legs covered or being reluctant to change for sport;
- Injuries which do not match the explanation given for them;
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence;
- Bruises which have a distinctive shape or pattern, like hand prints, grasp or finger marks or belt marks;
- Burns or scalds with clear outlines;
- Bite marks and bruises like love-bites;
- Bruising in or around the mouth.

Emotional Abuse: This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It is more than just occasional criticism. It may involve conveying to children 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 opportunity to express their views by deliberate silencing or making fun of what is said. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible signs of Emotional Abuse include:

- The child might become withdrawn, nervous, and unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children;
- The child is continually depressed and withdrawn.
- Runs away or is frightened to go home or is reluctant to attend school.
- Is persistently blamed for things that go wrong.
- Is made to carry out tasks inappropriate to their age.
- Is not allowed to do normal childhood activities.
- Displays excessive fear of their parents or carers.
- Is excessively clingy and tearful.

Sexual Abuse: The key elements in any definition of sexual abuse are the betrayal of trust and responsibility and the abuse of power for the purpose of the sexual gratification of the abuser. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence,

whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children with child on child abuse which **all** staff should be aware of (see part 10 of this policy).

The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force. Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long lasting effects. Some children who have been abused go on to abuse other children. Some find as they grow up that they are unable to have close relationships with other people. Others deliberately injure themselves. Additional advice and support can be found with the Centre of expertise on Child Sexual Abuse [Home | CSA Centre](#)

Possible signs of sexual abuse include:

- The child exhibits sexually explicit behaviour;
- Has inappropriate sexual knowledge for his or her age;
- Attempts suicide or self-inflicts injuries;
- Repeatedly runs away from home.

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 affect a foetus 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 caregivers) or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect include:

- The child is constantly hungry, greedy or stealing food;
- Has lingering illnesses which have not been treated;
- Is continually smelly, scruffy and dirty;
- Is often dressed in inadequate or unsuitable clothing for the weather conditions;
- Suffers repeated accidents, suggesting a lack of proper supervision;
- Is constantly tired;
- Does not respond when given attention or, on the other hand, one who craves attention and affection from any adult.

Domestic Abuse: This is not directly the abuse of children but its significance for young people's wellbeing means that it is emphasized in KCSIE. In addition the [Domestic Abuse Act 2021](#) recognises the impact of domestic abuse on children as victims in their own right if they see, hear, or experience the effects of this abuse. It is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass psychological, physical, sexual, financial and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse

occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children, including their ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass operates in the majority of police forces across England but does not, at the moment, include Independent Schools in Ealing pending a review. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the senior DSL digitally in school before the child or children arrive at school the following day. Hopefully this is re-established as it would ensure that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. The National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>

4. What to do if a Member of Staff has a Safeguarding Concern about a Child

If a member of staff has any safeguarding concern, they should act upon it straight away. 'Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately' (KCSIE). Guidance for this can be found in [What to do if you are worried a child is being abused – Advice for Practitioners \(March 2015.\)](#)

St Benedict's refers all matters of concern as a matter of course to Ealing Children's Integrated Response Service (ECIRS) the single point of contact for all safeguarding concerns in Ealing on 020 8825 8000 (or the LADO where it relates to concern about a member of staff) as a matter of course or the equivalent Children's Social Care service for a child who lives in a different Local Authority.

When a member of staff suspects or hears a complaint of abuse they must:

- Listen carefully to the child and keep an open mind. Staff must not take a decision as to whether or not abuse has taken place. Staff should understand that they are not making a diagnosis when receiving concerns, just taking them down to be passed on. It could be that signs of abuse noted in part 3 might not prove that there is abuse and they do not constitute proof in themselves.
- Not ask leading questions, that is a question which suggests its own answer for instance, 'was it your father?' or 'Did this take place on Tuesday when you were away?'
- Reassure the child that they are being taken seriously but that they cannot give a guarantee of confidentiality. The member of staff should explain that (while maintaining an appropriate level of confidentiality) they need to pass the information on to the DSL or, where appropriate, children's social care.

- Keep a written record of the conversation. This should include the date time and place of the conversation, the essence of what was said and done, by whom and in whose presence. It is also useful to describe observable behaviour such as crying, shaking, etc. although this should not be interpreted. Wherever possible, the actual words spoken by the child should be recorded. This should be signed by the person making it and should use names not initials. The record must be kept securely and handed to the DSL. If possible notes should be taken in the meeting itself, or if not then as soon as possible after it. MyConcern is a good way of entering and retaining records like this securely.
- Preserve any evidence that they are given for instance scribbled notes, mobile phones with messages on them, clothing or computers. **One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.**

Early information sharing is vital and staff should not assume that another colleague will take action or share information to help keep that child safe. Advice can be found [here](#). No single professional can have a full picture of a child's needs and everyone who comes into contact with them has a role to play in identifying concerns. UK GDPR does not prevent the sharing of information for the purposes of keeping children safe, as elaborated in section 7.

All suspicions or complaints of abuse must be reported to one of the DSLs (or the Head if the complaint involves the DSL). If a DSL is not available, this should not delay appropriate action being taken by any member of staff though and **anyone can make a referral**. However, if this happens, the DSL should be informed of actions that have been taken as soon as possible. The DSL (or the Head in the case of an allegation against a member of staff) will:

- Look at the child's pastoral/safeguarding record on MyConcern;
- Make a referral if not already made by a member of staff, and if a referral by phone has been made to complete a written referral form for either ECIRS (Downloaded from: <https://www.egfl.org.uk/services-children/ealing-childrens-integrated-response-service-ecirs-referrals>) or the LADO if relating to an allegation against a member of staff (Downloaded from: <https://www.egfl.org.uk/services-children/safeguarding/child-protection/staff-allegations>) or the relevant children's social care service if the child lives in a different Local Authority.
- Inform the parent/carer unless it is felt that this would put the child at risk. Although parental consent is not needed, it is almost always beneficial to have cooperation. This issue, and what should be said to parents, will be discussed with children's social care.
- Provide as much information as possible in a referral, particularly as the referral should consider whether children are being harmed in contexts outside the home – known as [contextual safeguarding](#).

5. Categories of Referral to External Agencies

In all cases where referrals are made to Children's Social Care or any other external agency, any member of staff may make a referral but in the majority of cases the referral will be made by a DSL. If a referral is made by another member of staff, they will receive support from the DSL in making the referral and working with external agencies after this. The contact details for making referrals in Ealing can be found at the start of the policy (if a child lives in a different authority the referral will be made to that different authority.)

When safeguarding concerns emerge, the member of staff concerned/DSL should refer to the Ealing Thresholds of Need Guide summarised as:

Level 1: Universal Need: No assessment needed

Level 2: Low to Medium Need: EHAP completed and/or referral to SAFE (Supportive Action for Families in Ealing) for Assessment and Plan.

Level 3: Complex Need: Child and Family Assessment (CFA) needed

Level 4: Acute Need: Child and Family Assessment (CFA) needed and a Child Protection Investigation

Different levels of referrals and response can be summarised as follows:

Early Help – At Level 2 of the Ealing Thresholds: ‘Early Help means providing support as soon as a problem emerges at any point in the child’s time at school’ and it helps to improve family resilience and outcomes or at least reduces the chance of problems getting worse. If Early Help is appropriate for a child, the referrer will liaise with the Family Information Service (FIS) to set up an Early Help Assessment and Plan (EHAP) to support this early help assessment. This is a process by which the needs of a child or young person are assessed and an action plan to meet those needs is agreed and progressed. Any such cases will be kept under regular review and consideration given to a potential referral to children’s social care for assessment if the student’s situation does not seem to be improving or is getting worse. Sometimes the child and their family will get support from the SAFE team – for details see website:

https://www.ealing.gov.uk/info/201023/children_and_families_social_care/1187/safe_-_supportive_action_for_families_in_ealing/1

Children in need – At Level 3 of the Ealing Thresholds. If a child is in need (‘unlikely to achieve or maintain a reasonable level of health or development...without the provision of services’ Childrens Act 1989) or suffering or likely to suffer from harm, then a referral will be made to ECIRS to consider a statutory assessment under section 17 of the Children’s Act 1989. If there seems to be a concern that this level of need is just a future possibility, then the School will work with parents and social services to set up an EHAP.

A child in need is defined under the Children Act of 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development or whose health and development is likely to be significantly further impaired, without the provision of services, or a child who is disabled.

Children suffering or likely to suffer from significant harm – At Level 4 of the Ealing Thresholds. A referral to ECIRS (or the LADO if a member of staff is involved) **must** be initiated where there are concerns about maltreatment including all forms of abuse and neglect, female genital mutilation, any other form of so-called honour based violence or extra-family threats such as radicalisation and sexual exploitation. Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm of this sort. This enables them to decide whether they should take an action to safeguard one of the children.

6. After a Referral Has Been Made

The local authority should make a decision within one working day of a referral being made about what course of action it is taking and should let the referrer know the outcome determining whether:

- The child requires immediate protection and urgent action is required
- The child is in need and should be assessed under section 17
- There is reasonable cause to suspect the child is suffering, or likely to suffer from significant harm and whether enquiries must be made and the child assessed under section 47
- Any services are required by the child and family

- Further specialist assessments are required to help the local authority to decide on the best course of action

Staff (generally the DSL) will follow up on a referral should information not be forthcoming within three days at least, but in practice within 24 hours. If social workers decide to carry out a statutory assessment at the School, the DSL or other member of staff with DSL support will do everything they can to support that assessment.

If early help or other support is appropriate, the case will be kept under review and consideration given to a new referral to social care. In particular, if after referral the student's situation does not appear to be improving the DSL or person who made the referral will press for reconsideration to ensure that the student's situation improves.

Whatever the outcome of a referral, the DSL will coordinate appropriate ongoing support for the child in school in conjunction with social services

7. Record Keeping

All concerns, discussions and decisions made in relation to safeguarding concerns and the reasons for those decisions should be recorded in writing. These records should be put onto MyConcern, the School's safeguarding database, as these records constitute a separate child protection file that is secure and confidential and can only be accessed by the relevant teachers – Senior pastoral leaders, the Head of Year and the Tutor. If in doubt about recording information, staff should always discuss with a DSL as this is 'special category personal data.' These MyConcern records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

Information about children's welfare may be shared with others outside the School to help keep children safe from harm. We always aim to discuss this with parents or carers before we do so, but this may not always be possible. If this is the case, the law allows us to share this information without asking first. The Data Protection Act is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Please refer to our Data Protection Policy for further information.

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The DSL will document information-sharing decisions and actions taken. More information on this can be found in chapter one of WT and advice for staff about information sharing with regard to safeguarding will be part of staff training on Safeguarding. All staff separately have training in handling personal information under the Data Protection Act 2018. More details can be found in:

[Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/data-protection-toolkit-for-schools)

[Information sharing: Advice for practitioners \(2018\).](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)

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

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

8. Allegations against Staff Members Volunteers or Governors

This section of the policy follows part 4 of KCSIE and also guidance from [Ealing Social Services](#).

St Benedict's promotes an open and transparent culture in which all concerns about adults are shared responsibly with the right people and recorded so that all concerns about adults working in any capacity in the School are dealt with promptly and appropriately. We also seek to create an environment where staff are confident to self-refer if, for example, they feel that they might have been misinterpreted or on reflection they believe they have fallen below the standards of our code of conduct.

If staff members have concerns about another staff member, volunteer, supply staff, or contractor who might pose a risk of harm to a child/children or may have harmed a child/children they should refer these to the Head without delay. This same duty applies to an allegation made against a Governor. Where there are concerns about the Head, this should be referred to the Chair of Governors. It should be ensured that any reporting of any allegations against the Head to the Chair of Governors is made without informing the Head. Staff may look to discuss any of these concerns with the DSL and make any referral through them.

If an adult makes an allegation that they were abused as a child, they will be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO. Abuse can be reported no matter how long ago it happened.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases will not meet the criteria of a member of staff having harmed or risking harm to a child or may do so without warranting either police investigation or enquires by local authority social services. The Head or DSL will always discuss the issue with the LADO within 24 hours (or ECIRS if they are not available) before taking a decision on this. In cases where external agencies are not required, St Benedict's will act to resolve the case as speedily as possible while also being fair and consistent. It is imperative that the welfare of the child is looked after. The DSL is responsible for ensuring the child is not at risk, and at the same time the person subject to the allegation should also be supported. In rare occasions when allegations are so serious they require immediate intervention from outside school, the DSL should be informed so that they can consult with external agencies.

8.1 Dealing with allegations that may meet the harms threshold

Allegations that meet the harms threshold occur if it is alleged that anyone working at St Benedict's 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 and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside school or college, known as *transferable risk*)

The School will not undertake its own investigations of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. However, the head can arrange for basic enquiries to establish facts before contacting the LADO while being careful not to jeopardise any possible police investigation such as: Was the individual in the School at the time of the allegations? Did the individual come into contact with the child? Are there any witnesses or CCTV? Where appropriate, the LADO or another officer appointed by the local authority will deal with the management and oversight of an allegation against a member of staff (see Flowchart 2).

In the first instance the DSL, the Head or (where the Head is the subject of an allegation) the Chair of Governors should discuss the allegation immediately with the LADO and a case manager will be designated. This is to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

In an allegations management meeting St Benedict's will share all relevant information with the other agencies which are also expected to do the same. St Benedict's will ask the police and/or social services to obtain consent from individuals involved to share their statements and evidence for use for the School's own disciplinary process.

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

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s) and/or social services and the police if appropriate. It is extremely important that the case manager provides them with as much information as possible at that time. Where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not inform the accused until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance in *Working together to safeguard children*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. ('Reasonable' means 'using no more force than is needed' and can either be passive to block a pupil's path or active such as leading a pupil by the arm out of a classroom. Advice on this is available at [Use of Reasonable Force in Schools](#). [Reducing the need for restraint and restrictive intervention](#) gives information about how to support children with learning disabilities and mental health issues who are at risk from restrictive intervention). If the case manager has concern about the welfare of other children in the community or the member of staff's family they should be discussed with the DSL and a risk assessment made and potentially a referral to social services.

Where it is clear that an investigation by external agencies is unnecessary, the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the School or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO should discuss with the case manager how, and by whom, the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the School or college's staff. However,

in other circumstances, such as the nature or complexity of the allegation, the allegation will require an independent investigator. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process with a fortnightly or monthly review depending on the complexity of the case. The first review will, if possible, take place four weeks after the initial assessment and dates for subsequent reviews will be set then. The LADO will provide guidance and advice while the investigation is carried out by either school, social services or the police or a combination.

If there is/has been a criminal investigation or prosecution the police have a duty to inform St Benedict's when the investigation/trial is complete or the investigation has been closed without charge or it has been decided not to prosecute. The case manager will then discuss the case with the LADO and consideration of next steps will take into account the result of the investigation and in particular the different standards of proof required by disciplinary and criminal proceedings.

Suspension

Suspension should not be an automatic response when an allegation is reported and the case manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the School or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. A number of alternatives for suspension can be found in paragraph 381 of KCSIE. It should only be considered in cases where there is cause to suspect a child, or other children are at risk of harm or if the cases is so serious that it could be grounds for dismissal. Advice on this should be taken from the LADO if in doubt. Social services or the police cannot require that a member of staff be suspended although their views should be given weight. Police involvement does not make it mandatory to suspend a member of staff.

If suspension is considered necessary, the case manager will record the rationale and justification for this and explain what alternatives were considered and why rejected. Often an inquiry can be resolved quickly without suspension and a decision will then be made about whether the individual will continue to work at St Benedict's. When a member of staff has been suspended the LADO and case manager should consider how similar investigations could be carried out without a suspension.

Supply teachers and all contracted staff

If there is an allegation against a supply teacher or contracted member of staff working at St Benedict's then of course all of the procedures above would be followed with the additional step that the Governors, via the Head, would ensure that the supply teacher's agency was part of the discussion with the LADO about the appropriateness of suspension from duties. It is expected that any supply agency would be fully involved and co-operative in any safeguarding investigation like this, and it is important that a teacher in this situation would not be able to work at another school while an investigation was ongoing if that was felt to be inappropriate.

As with one of our full-time members of staff the School would take the lead in an investigation as directed by the LADO, and the supply teacher should be advised to contact their trade union representative if they have one or a colleague for support. It is important that the agency will contribute to information sharing so that any previous concerns or allegations or concerns known to the agency are taken into account and the agency's human resource manager or equivalent will be invited to any allegations management meetings arranged by the LADO or other relevant meetings.

St Benedict's will not stop using a supply teacher or contracted member of staff due to safeguarding concerns without finding out the facts and liaising with the LADO.

More generally, when using an agency, St Benedict's will inform the agency of our processes for managing allegations and keep them up to date with information about our policies. The policies of the agency will be taken into account, as will their duty to refer to the DBS as personnel suppliers. The agency's HR manager will be invited to meetings about cases involving their staff.

Support for those involved

St Benedict's has a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues for support and should also be given access to counselling. If suspended, the member of staff will receive written confirmation within one working day with an appropriate level of detail about the reasoning. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate, and the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation to help minimise stress.

Parents/carers of the child or children involved should be told of the allegation as soon as possible. However, where a strategy discussion is required or external agencies need to be involved the case manager should not do so until they have been consulted and agreed what information can be disclosed. Parents/carers should be kept informed of the progress of the case and told the outcome where there is not a criminal prosecution. They should be told any disciplinary outcome in confidence, and parents/carers should be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing. If St Benedict's needs to make parents aware of an allegation it will be made clear to parents and others that there are restrictions on publishing information.

When an allegation is made, the School should maintain confidentiality while it is being investigated. Reporting restrictions under the Education Act 2011 apply until either the accused is charged with an offense or the Secretary of State or the DfE/TRA (Teaching Regulation Agency) publishes information about an investigation or decision on a disciplinary case. The case manager will take advice from the DSL / police/ social services about who needs to know and what information can be shared in the case; how the School manages leaks/gossip; what information can be given to reduce speculation; how to manage the press. Reporting restrictions do not apply if the individual subject to allegations goes public themselves or gives written consent for another to do so.

Where it is decided that a person who has been suspended can return to work school will provide help and support, particularly with regards to their contact with the child who made the allegations.

Making decisions on allegations

The School will give due weight to the views of the LADO and to this policy when making a decision about suspension. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Teaching Regulation Agency can be found in [Teacher misconduct: the prohibition of teachers \(2022\)](#).

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

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

St Benedict's has a legal duty to report to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the harm test is satisfied in respect of that individual;
- Where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence;
- If that individual has been removed from working (paid or unpaid) in regulated activity (even if deployed to another area of work not regulated or if suspended), or would have been removed had they not left.

A compromise/settlement agreement will not be used where there is an allegation that an individual poses a risk to children and there will always be a prompt and detailed report to the DBS and Teaching Regulation Agency. In each case St Benedict's will consider whether to refer the case to the Secretary of State who may investigate the case. Any such incidents will be followed by a review of the safeguarding procedures within the School done together with the LADO, with a report being presented to the Governors without delay.

School will also not stop their investigation if the person leaves or resigns as it is important that allegations are investigated thoroughly in every case. The accused will have full opportunity to answer allegations, but the process of investigating the allegation will continue even if the accused does not cooperate. If they have left before the process is complete they should be notified of the conclusion of the investigation and sanctions that result from it.

It is important that reports to the DBS include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise/settlement agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The Governors have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources. The School will confirm to inspectors all instances of action in relation to safeguarding concerns and if the allegation is substantiated the outcome will be made clear when providing references as long as the information is factual and does not include opinions.

For substantiated allegations, the following information should be kept on the file of the person accused so that reference checks can be accurate and provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- A note of any action taken and decisions reached and the outcome.
- A copy of the allegation provided to the person concerned where agreed by social services and the police.
- A declaration on whether the information will be referred to in any future reference.

Records about allegations of sexual abuse must be preserved for IICSA for the terms of the inquiry and all other records retained at least until the accused has reached pensionable age or for 10 years from the date of the allegation if that is longer. Further guidance on employment records can be found [here](#).

If an allegation against a member of staff is found to have been malicious, it will be removed from personnel records. If an allegation is not substantiated, is unfounded or malicious, it will not be referred to in any employment reference. For all other allegations, a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on a person's confidential personnel file, and a copy provided to the person concerned. In such cases the LADO and case manager will consider if the person who has made the allegation needs support and may have been abused at another time. With malicious allegations the School will consider whether disciplinary action is appropriate against the person making the allegation.

Whatever the outcome of a case and how serious it has been, the case manager will consider the case and determine whether any lessons can be learned or improvements made in the light of this.

8.2 Concerns that do not meet the harms threshold (low level concerns)

A low-level concern is still significant as an issue that is inconsistent with the staff code of conduct but is not enough to meet the harms thresholds as set out in section 8.1 and so would not normally be considered serious enough to refer to the LADO. Examples of such behaviour (and this can be behaviour both in and outside school) are: being over friendly, having favourites, taking photographs of children on their mobile phone, engaging with children one-to-one away from other people, using inappropriate sexualised, intimidating or offensive language or in any other way humiliating a pupil. Such concerns can arise from disclosures from children, parents, or other carers or as a result of vetting checks. More detailed guidance on low-level concerns can be found [here](#). Where there is uncertainty about the level of concern raised then the LADO will be consulted.

St Benedict's has a staff code of conduct which makes clear the expectations of staff, what constitutes a low-level concern and the importance of openness and transparency when dealing with these issues. It also makes clear that staff should feel empowered to share low-level safeguarding concerns with the head, that unprofessional behaviour will be addressed (including support to help correct it) and that there will be a proportionate response to concerns when raised. The Governors ensure that this is implemented effectively through regular training in both safeguarding and the code of conduct.

Any such concerns about any member of staff should be reported in the same way as more serious concerns that do meet the harms threshold to either the head of junior or Senior School or the Chair of Governors. If a concern is raised by a third party the Head will collect evidence on the concern by talking directly to the person who first raised the concern and also to the individual involved and any witnesses. This will help to categorise the type of behaviour and determine next steps, all of which needs to be recorded along with the action taken and rationale for that. These concerns are shared responsibly and dealt with appropriately as with any other concern.

All low-level concerns are recorded with details of the concern, the context of the case and the action taken along with the name of the individual sharing the concern unless they wish to be anonymous. These records are kept securely and confidential with the HR department. There is review of concerns so that possible areas for improvement in the School's safeguarding system and wider culture can be addressed and so that potential patterns of concerning behaviour can be identified. If a pattern is noted the School will consult with the LADO about next steps. Information on low-level concerns will be retained by the School while it holds a file on that member of staff.

Low-level concerns are not included in references unless they would normally be included, for instance misconduct or poor performance.

9. Child on Child Abuse

The School recognises that children are capable of abusing other children, known as child on child abuse. This can either be between two children of any sex or through a group of children abusing a child or another group of children. It can happen both in school and outside school and can also happen online. Any incidents of alleged or suspected abuse by children or young people will be taken seriously and reported to the safeguarding leads immediately.

All staff understand that, in whatever form it takes, it is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter', 'just having a laugh' or 'boys being boys'. All staff are trained in our procedures with regards to child on child abuse and that they have an important role to play in preventing or responding to it. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the School and in worst cases normalizes abuse leading to children accepting it as normal and not coming forward to report it.

Staff know that child on child abuse might take various forms so that they can identify and respond to it; for example, (and the following list is not exhaustive):

- Bullying, including cyberbullying and prejudice-based and discriminatory bullying such as racial, homophobic, gender or culture-related bullying or abuse.
- Physical abuse such as hitting, kicking, biting (this may include an online element condoning or threatening physical abuse);
- Sexual harassment and sexual violence, including abuse in intimate personal relationships between children (this may include an online element condoning or threatening physical abuse)
- Causing someone to engage in sexual activity without consent e.g. forcing them to strip, touch themselves sexually or engage in sexual activity with a third party;
- Via the use of ICT e.g. consensual and non-consensual sharing of nudes and semi-nude images and/or videos, or 'revenge pornography' - staff should be particularly mindful of the potential for the misuse of information technology for bullying and abusive purposes and that these concerns are exacerbated by the possible misuse of AI.
- Grooming by children as part of child sexual exploitation;
- Abuse linked to gang-related activity or initiation-type violence/rituals.
- Upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. This is a criminal act under the Voyeurism Act of April 2019. The Act specifically states that the culprit cannot claim that images were just taken 'for a laugh,' and anyone of any sex can be a victim.
- Initiation/hazing type violence/ritual, which could include harassment, abuse or humiliation as an initiation process and may include an online element.

We know that child on child abuse might manifest differently for boys and girls, e.g. girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs etc. Such abuse may also be indicative of a previous or ongoing abusive experience for a perpetrator and / or victim.

Research indicates that children with SEN, additional or complex needs are particularly vulnerable. All staff should be mindful of the added vulnerability of children and young people who have been the victims of violent crime, including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs, as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may, therefore, be suffering, or at risk of suffering, significant harm and be in need of protection. Consequently, any plan to reduce and / or manage risk posed by a child who is alleged to have abused another must also address their needs and responses should be considered accordingly.

As a school, we recognise that it is not enough 'just' to respond to incidents should they arise. We understand, that even if there are no reports in our school it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse, they should speak to their designated safeguarding lead (or deputy). In addition, we try and **minimise the possibility of child on child abuse** by:

- Creating and maintaining an environment which is safe, caring, respectful and stimulating, and which seeks to promote the social, physical, and moral development of our pupils;
- Actively discouraging and challenging all unacceptable behaviour, including all forms of bullying and abuse. We will also challenge the attitudes and behaviours which underpin it;
- Strike an appropriate balance between pupil's right to privacy and the need for proportionate supervision to keep them safe in and around school;
- Have in place clear strategies for promoting positive behaviour, including a system of rewards and sanctions that is clear to staff, pupils, and parents;
- Maximise opportunities within the curriculum, via PSHE, assemblies and focused weeks to deliver key keeping safe and associated behavioural, spiritual, moral, social, and cultural messages - including the use of external resources and the expertise of external speakers and groups;
- Ensuring that all adults associated with our school understand their role and responsibilities as role models;
- Ensuring that staff and any volunteers are trained to look for and respond appropriately to any potential indicators of child on child abuse.
- Seeking appropriate and timely advice where uncertainty exists and / or concerns arise.
- Ensuring that children, and parents, know how to raise any worries or concerns with adults / staff in school and by signposting them to appropriate sources of advice and support outside school.

Responding to Allegations of child on child Abuse

The School recognises the need for sensitivity and proportionality when dealing with these difficult issues. The following general rules will apply to their management:

- The safeguarding leads will seek appropriate and timely advice wherever necessary and contact ECIRS where there are concerns, or the equivalent if the child lives in a different Local Authority. The safety and best interests of victim(s) will be the paramount consideration at all times. The safeguarding leads will also consider the possibility and take account of any wider and / or ongoing risk(s) to others;
- The needs of the victim and the needs of the alleged perpetrator will be considered separately;
- In addition to safeguarding the identified victim, the School will consider (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk;
- Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes;

- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children;
- Where necessary, the School will participate fully in a co-ordinated approach by child welfare/ protection, youth offending, education, and health agencies.

10. Sexual Violence and Sexual Harassment Between Children

This section of the policy follows Part 5 of KCSIE and also Annex B which has many links to online support and advice. It is also informed by Ofsted's [Review of sexual abuse in schools and colleges \(June 2021\)](#).

Harmful sexual behaviour (HSB) is a useful umbrella term for the different forms of inappropriate, problematic, abusive and violent sexual behaviour. In considering HSB sexual behaviour where there is a big age difference (more than two years) can be considered harmful although it also depends on e.g. physical size, or if for instance the older child has a disability. Understanding HSB is an important part of safeguarding training at St Benedict's and also the PSHE programme.

Sexual harassment is 'unwanted conduct of a sexual nature' and can include sexual comments such as sexualized names, comments or stories, sexualized jokes, physical behaviour such as brushing against someone or interfering with their clothes, displaying pictures of a sexual nature, online sexual harassment such as consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. It can violate a child's dignity, make them feel intimidated or degraded and create a hostile, offensive or sexualized environment.

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including, rape and sexual assault. Specific definitions of types of sexual violence can be found in part 5 of KCSIE. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline (or both) and violates a child's dignity and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment. Sexual harassment and violence exist in a continuum and may overlap.

St Benedict's works closely with the Schools Consent Project to educate all its students about consent, and that it is the freedom and capacity to choose. Specifically in sexual relations consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consent to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Very importantly:

- **A child under the age of 13 can NEVER consent to any sexual activity;**
- **The age of consent in the UK is 16;**
- **Sexual intercourse without consent is rape.**

St Benedict's has a zero tolerance approach to sexual violence and/or sexual harassment and will always respond appropriately to all reports, including incidents taking place outside school or online. Even if an incident does not seem that serious in the first instance addressing any poor behaviour will help to prevent further, and potentially worse, behaviour in the future. All staff understand that, in whatever form it takes sexual violence and/or sexual harassment is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter', 'just having a laugh' or 'boys being boys'. St Benedict's challenges inappropriate behaviours, in particular potentially criminal behaviour such as grabbing bottoms or breasts and genitalia, flicking bras, lifting up skirts and such actions are sanctioned severely under our discipline policy. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the School and in worst cases normalizes abuse leading

to children accepting it as normal and not coming forward to report it.

As with any safeguarding, staff must always take the line that 'it could happen here', particularly (but not exclusively) in the case of boys against girls with 64% of girls aged 13-21 saying they had experienced sexual violence or harassment in the past year (Girlguiding's Girls' Attitudes Survey 2017). However, as with any child on child abuse, sexual violence and harassment can occur between any two children, or groups of children regardless of age or sex. There is regular staff training on being vigilant for, and responding to, incidents of sexual violence and harassment.

Also, as in other areas of Safeguarding, it is important to be aware that SEND students can be especially vulnerable. This issue is addressed as a whole school issue as part of our wider safeguarding policy. It forms part of staff training and is dealt with in the School PSHE course for all the students.

Children who are victims of sexual violence and/or harassment will find this stressful and distressing, particularly if the alleged perpetrator(s) attend the same school or college. Even more than with other forms of child on child abuse we understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy).

All victims are taken seriously, supported to be kept safe, and are offered support both pastorally and also bearing in mind the potential impact on their educational attainment. Staff will look to emphasise to the victim and reassure them that they are being taken seriously, they are being supported and will be kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment and they should certainly not be made to feel ashamed by making a report. It will also be explained that the law is there to protect children and not criminalise to help avoiding alarm or distress.

Making/receiving a report

Students are encouraged to report abuse or any other safeguarding concerns to a member of staff that they trust, and this is regularly reinforced in PSHE lessons and form time. Students have the opportunity to raise concerns with their pastoral tutor or their head of year. In addition, the Senior School also uses the Skodel pastoral app.

It is often not easy for children to tell staff about abuse directly. Often concerns will arise from changing behaviour or appearance and staff might also hear about abuse indirectly from another student or possibly from overhearing conversations about possible concerns. Staff should always look to act if they have any concerns that come to them indirectly like this. In particular they should bear in mind that some children may face additional barriers to reporting because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

We will aim where possible to have two members of staff present in the case of a student making a disclosure. As ever with safeguarding they will not promise confidentiality although the report will also only be shared with the necessary people. Also, as with other safeguarding disclosures staff should look to listen carefully, reflect the child's language in what they say, be non-judgmental and not ask leading questions although **staff can ask children if they have been harmed and what the nature of that harm was**. An objective written record should be made either during the meeting or straight after (the preferred option so that the child can be given full attention). Next steps will be explained to the victim including who the report will be passed to.

It is extremely important that all staff respond properly to a report from a child because this response will either encourage or undermine the confidence of that child or other students to potentially come forward to report

sexual violence and/or harassment in future. A disclosure of sexual violence or harassment will be treated like any other safeguarding disclosure, including abuse that occurs online or outside school.

Staff should bear in mind that this might be only the first reported incident rather than just a single incident. Trauma can affect memory so children might not be able to recall some details.

One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.

Responding to a report

The School will offer support such as counselling to the victim. If an allegation does go through the criminal justice system, there will be anonymity offered in the legal system, and St Benedict's will do all it can to reasonably protect the anonymity of any children involved in a report of sexual violence or harassment. P151 of KCSIE has guides for supporting children in the court system. It is understood that Social Media may make this more difficult and the School be watchful as far as it can be for this possibility. As ever with safeguarding, only appropriate and relevant staff will be informed about the report.

When there has been a report of sexual violence the DSL will make an immediate risk and needs assessment (and in cases of harassment if it is felt necessary) considering the victim's needs, whether there have been other victims, the alleged perpetrator and other children in their peer group (and possibly staff). Risk assessments will be recorded and kept under review considering the risks and putting measures in place to protect all concerned and keep them safe.

Reports of sexual violence and sexual harassment are often particularly complex and difficult and so the DSL will always look to talk through any cases such as this with Ealing social services unless it is clearly of a very low level for instance a one-off incidence of name calling. In cases where a crime has been committed the DSL will also contact the police, and more widely will contribute to any multi-agency requirements as necessary.

The DSL will normally be the person to decide on the School's response to a report of sexual violence or harassment. In all cases, the initial report will be carefully evaluated on a case-by-case basis. The School's approach will consider:

- The wishes of the victim on how to proceed where possible. Victims should be given as much control as reasonably possible over how the investigation will proceed and what support is offered to them although this will be balanced with our responsibilities to protect other children;
- The nature of the alleged incident;
- The ages and developmental stages of the children involved. In particular, if there are any power imbalances for instance if an older child is the perpetrator;
- If this is a one off incident or part of a pattern (including the possibility of other forms of abuse);
- That sexual violence and harassment can take place within intimate personal relationships between children.
- Any ongoing risks to the children involved including the wider protection of all the children in St Benedict's;
- Wider environmental factors where incidents or behaviour is associated with issues outside school and environmental factors are present that are a threat to the one or more of the children's health or welfare. This contextual understanding can be very important if a safeguarding referral is made.

Acting on a report

Given the distress caused by potential close proximity of a victim and an alleged perpetrator at school, the alleged perpetrator in a very serious case such as rape or assault will be removed immediately from any classes they share with the victim. Risk assessments should be updated as appropriate. Separation is done to support both children and is not a judgement on the guilt of the alleged perpetrator. More widely outside the classroom, the DSL will look to see how the children involved can be kept a reasonable distance apart from outside while the facts of the case are established either by school or social services or the police. In other cases of sexual violence and/or harassment again the DSL will make a judgement on whether, and how much, separation is needed.

The DSL should carefully consider when to inform the alleged perpetrator(s) of the report. Where social services and/or the police are informed this would only happen after discussion with these other agencies.

The victim may ask St Benedict's not to tell anyone about an incident but as with other safeguarding incidents if a child has been harmed, is at risk of harm or is in immediate danger a referral must be made, and if a crime has been perpetrated this must be referred to the police. Parents/carers will normally be informed unless this would put the victim at risk. The DSL will balance the victim's wishes against the duty to protect them and other children and will generally look to take advice with external agencies.

Consideration will be given to supporting other students who have witnessed or been affected by an incident. This includes working to ensure students are not taking 'sides' and bullying or harassing any of those involved either physically or online. This includes consideration of how students get to and from school.

There are four likely scenarios to consider when managing reports of sexual violence and/or sexual harassment

- 1) **Manage Internally.** This might be the case with, for instance, a one-off low-level incident. It should still be made clear though that there is zero tolerance of this sort of behaviour and all the discussions and decisions made around the case should be recorded as usual.
- 2) **Early help.** While it might be that no referral is needed in a case like this it might be decided that support is needed to address concerns and to prevent an escalation of unacceptable behaviour either from within school or with the services offered through ECIRS and an EHAP application. It could be that both are used as the School can manage the situation internally and also seek external 'Early Help.' Again, all the details of the case will be recorded and zero tolerance will be stressed.
- 3) **Referral to social care.** Where a child has been harmed, is at risk of harm or is in immediate danger a referral will be made to ECIRS. This referral will be made with the same principles as any safeguarding referral, with particular significance given to the need to make sure that the victim, and any other affected children including the alleged perpetrator are protected immediately without waiting for an investigation to start. Social services may feel that intervention is not appropriate, but a new referral should be made if it is felt that the child remains in danger or at risk of harm. Again, all the details of the case will be recorded and zero tolerance will be stressed.
- 4) **Report to the police.** These reports will always in parallel with an ECIRS referral, and police reports will always follow from reports of rape, assault by penetration or sexual assault. More advice can be found [here](#) on contacting the police. Next steps will be made in consultation with the police including whether the police will take further action and when to inform parents, and the DSL will make sure that actions taken by St Benedict's do not jeopardise the police investigation. If a student is given bail or is released under investigation St Benedict's will carry out a risk assessment for that student in liaison with the police. Again, all the details of the case will be recorded and zero tolerance will be stressed.

In the case of a criminal investigation St Benedict's will work closely with the police and other agencies to ensure the School's actions do not jeopardise the police investigation while it is ongoing. KCSIE para 551 specifies that 'Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing' but this will always be considered on a case-by-case basis. If a criminal investigation leads to a conviction or caution, St Benedict's will then take disciplinary action according to the School discipline policy. In most situations like this, the incident would be a serious breach of discipline and lead to the view that allowing the perpetrator to remain at St Benedict's would seriously harm the education and welfare of the victim. Whether the perpetrator remains in school or not a risk assessment will be made for all the children involved in consultation with the children, families and external agencies with particular emphasis on avoiding bullying and harassment from other students who may well know about the case.

If there is no further action on the case school will provide support and also follow its own disciplinary procedures as the burden of proof for a criminal case and a school disciplinary proceeding is very different. If a report is found to have been unfounded or false or malicious the DSL will consider what further steps need to be taken both in supporting the pupils and also potentially as a disciplinary concern. The DSL will record decisions made on MyConcern both to record the events and to explain decision making.

Decisions regarding safeguarding support for the victim should be based on the following principles:

- As above, the needs and wishes of the victim should be paramount within the context of protecting the child. Wherever possible the victim should be able to continue with their normal routine so that St Benedict's remains a safe place for them. A victim will never be made to feel they are the problem for making the report;
- Also as above, consider the age and developmental stage of the victim, especially as there will often be a power/age imbalance between the victim and alleged perpetrator;
- Support should be on a case-by-case basis so that there is a proportionality to the School response as well as effective support for the victim. It is possible that this support could be very long-term depending on the nature of the incident and St Benedict's will in particular seek to ensure that the victim is not isolated from their peer group or bullied or harassed;
- Needs can be on a range including mental, physical and sexual health or unwanted pregnancy and external support can be found with the NHS Sexual Assault Referral Centre (SARC). Details of this and further support can be found in paragraph 539 of KCSIE.

Decisions regarding safeguarding support for the perpetrator should be based on the following principles:

- While needing to safeguard the victim and wider student body, the alleged perpetrator will also need support and they should be provided with education, ongoing safeguarding support and information about any disciplinary sanctions. Support and disciplinary proceedings are not mutually exclusive and may need to happen at the same time;
- Consideration of the developmental stage and age of the alleged perpetrator and the proportionality of the response to be decided on a case-by-case basis.
- The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour [Home - Shore](#)

All decisions and actions are regularly reviewed and 'lessons learnt' are discussed. If patterns of behaviour across the School are identified then the pastoral team will look to take appropriate action to remedy this. Consideration will always be given as to whether extra teaching time and/or staff training should be put in place to make sure that the wider culture of the School is such that possibilities of inappropriate behaviour like this are minimized.

11. Safeguarding Children Away from the School Site (including work experience)

When on school trips, it is important that staff continue to apply all elements of the safeguarding policy and continue to be vigilant for potential safeguarding issues. The Deputy Head can be contacted on his school phone or by email if there are any urgent safeguarding issues that need discussion.

Students sometimes stay with a host family when on a trip, often a foreign language exchange. St Benedict's has responsibility for students who come and stay with our families and school would arrange for a DBS enhanced certificate for anyone aged 16 or over in the household where the child will be staying. It is not possible to obtain DBS checks for adults who provides homestays for our students abroad. St Benedict's will liaise with partner schools to understand the arrangements in place and ensure that they are appropriate and sufficient to safeguard every child on the exchange.

Following KCSIE, where a child is placed with an alternative provider and on work experience, St Benedict's continues to be responsible for safeguarding and has to be satisfied that the provider meets the needs of the pupil. An example of this is the timetabled service activities done by the lower 6th with different organisations around Ealing. St Benedict's will obtain written confirmation that the appropriate safeguarding checks have been carried out on individuals working at the establishment as would happen at school. If the person working with a St Benedict's students who is under 16 is unsupervised and in regular contact with them we will ask the employer to ensure that the person providing the supervision has an enhanced DBS. Schools are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervision children aged 16 to 17 on work experience.

St Benedict's does not ordinarily organise work experience, but if this does happen the School will ensure that the placement provider has safeguarding policies in place. The specific circumstances of the work experience and the supervision in place will determine what different checks might be needed for the supervisors of the work experience. In addition, it may be necessary for the organiser of the work experience to request a DBS enhanced check for the child doing work experience if they are 16 or over and working with children.

12. Looked After Children and Children with Social Workers

A child who is looked after by a local authority (referred to as a looked-after-child) as defined in section 22 of the Children Act (1989), means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority. Should the School have on roll a child who is looked after by the Local Authority, St Benedict's will ensure that our staff have the skills, knowledge and understanding necessary to keep them safe. In particular the DSL will ensure that all agencies work together and prompt action is taken on concerns to safeguard these particularly vulnerable children.

Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. Virtual School Heads also have a non-statutory responsibility to promote the educational achievement of all children in kinship care.

A child who has been looked after in the past remains vulnerable and so St Benedict's will continue to have extra pastoral support in place for them.

If there is a child at St Benedict's who has been in care, the DSL will get the details of the local authority Personal Advisor who has been appointed to support them and will liaise with them if there are any concerns.

Children may need a social worker due to safeguarding or welfare needs such as abuse, neglect or complex family circumstances. Local authorities should share the fact that a child has a social worker and the DSL will record this on MyConcern, so that all the relevant teachers are aware. Where children need a social worker, this will inform decisions about safeguarding (for instance responding to unauthorized absence or similar indications of possible risk) and about promoting welfare (like the provision of pastoral and/or academic support). For more information see [Review of children in Need](#) (2019).

13. Private Fostering

If a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility or relative in their own home this is Private Fostering. It is not considered private fostering if it happens for fewer than 28 days. Where the School becomes aware of a private fostering arrangement this should be raised with the DSL. The School must then notify the local authority so that they can check that this arrangement is suitable and safe for the child. Once notified, a social worker from the local authority will arrange to visit the child's parents, the private foster carers and the child themselves. They will keep in touch with these people at regular intervals to ensure that everything is going well and will offer support to foster carers and parents.

14. Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers arise when recognising abuse and neglect in this group of children. It can sometimes be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. In addition, these children can also be disproportionately impacted by things like abuse, neglect or bullying without outwardly showing any warning signs, often due to communication barriers, isolation, dependency on others etc. SEND students also face additional risks online from potential bullying, grooming or radicalisation and should be supported to stay safe online. A number of serious case reviews have also highlighted the dangers inherent in focusing on adult rather than a child's needs and on a primary focus on support as 'opposed' to potential risk [of abuse]. St Benedict's ensures that students on our SEND register receive additional pastoral support, with key workers to help support them in addition to the usual pastoral structure of the School.

These children can also suffer abuse in ways other than via overt physical or sexual assaults, which means that staff need to be mindful of a wide-range of issues when working with these young people. For example, privacy, dignity and respect, food, mobility / restraint, intimate care, finances, medication, the use of aids and adaptations.

In order to safeguard children with more complex needs, staff in school will work especially hard to develop the skills they need to give them a 'voice'. In practice, three essential questions always need to be asked:

What is expected of this child? - Developmentally, behaviourally etc.

Do I / we understand how any condition, disability, impairment or other factor e.g. culture impacts?

How well can I / we understand and communicate with this child?

National guidance makes it clear that for some children it is not yet possible to prescribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. Spontaneous disclosures are rare from disabled children, especially those who use alternative or augmentative communication systems and abuse is more likely to be identified via physical signs, behavioural responses and /or emotional presentation / changes. It is therefore imperative that staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that regular consultation occurs between the SENCO and DSL in school, especially in circumstances where issues and / or concerns arise.

When applying disciplinary measures to SEND students, the risks will be considered so that it does not add to the vulnerability of the child, for instance if isolating the child from class or having to restrain them in examples of dangerous behaviour physically. The SEND department works with the pastoral team and all the staff to ensure that there is a clear set of guidelines of how best to work with each of the children on the SEND register, in particular by planning positive and proactive behaviour to avoid problems in advance.

Links to useful external agencies for support with safeguarding and SEND can be found in paragraph 204 of KCSIE.

15. Children with Mental Health Problems

St Benedict's has a separate mental health policy to be read in conjunction with this.

All staff should be aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. While only trained professionals should attempt to diagnose mental health problems, staff are well placed to observe and identify children whose behaviour suggests they may be experiencing a mental health problem or at risk of developing one.

If a child has suffered abuse, neglect or other potentially traumatic experiences, this can have a lasting impact and staff need to be aware of how these experiences can affect mental health, behaviour and education. If staff have a mental health concern, particularly if it is associated with a safeguarding concern, they should record this on MyConcern and/or speak to the DSL.

In the first instance if mental health issues are identified, St Benedict's will look to provide support with the SEND department and school counsellor among the possible sources of support. If it is felt that it would be helpful and that the threshold would be met, we will make a referral to CAMHS, and/or suggest that the child goes to their GP to ask for them to make a referral to CAMHS.

St Benedict's helps to prevent mental health problems by promoting resilience across the curriculum, and in particular through the PSHE program as part of an integrated whole school approach to social and emotional wellbeing. The School Counsellor is the senior mental health lead for St Benedict's, working together with the DSLs, pastoral team of heads of year, school nurse, school counsellor and SENCO to promote wellbeing and mental health.

There are a range of useful resources:

[Mental Health and Behaviour in Schools \(2018\)](#)

[Preventing and tackling bullying, mental health and behaviour in schools](#)

16. Diversity and Inclusion

It is understood that a student who is lesbian, gay, bi or trans or gender questioning (LGBT), or perceived to be LGBT by other students, may be targeted by other children. Because of this risk St Benedict's includes lessons on understanding LGBT in its PSHE curriculum. In addition, St Benedict's Mr Ramsden, in his role as head safeguarding and wellbeing is the designated member of staff who acts as a point of contact for students to speak out and share their concerns.

While not specified in KCSIE St Benedict's also works actively to educate against all discrimination, and promote inclusion in the other key areas including race, gender and neurodiversity. These topics are also covered in the PSHE curriculum, and there is ongoing staff training in Diversity and Inclusion to encourage understanding of these issues and encouraging dialogue and student voice. Mr Ramsden in his role as senior DSL takes a lead on Diversity and Inclusion at St Benedict's.

Paragraphs 205-209 of KCSIE notes that 'this section remains under review, pending the outcome of the gender questioning children guidance consultation' due to published in summer 2025. The only current government guidance is in draft form as '[Guidance for Schools in relation to Gender Questioning Children](#)'. KCSIE notes the findings of the Cass review which said that caution is necessary supporting 'children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.' Following this advice St Benedict's will work with families (except in cases where this would constitute a safeguarding risk to the child) to support trans/gender questioning children and encourage them to seek appropriate clinical help and advice.

17. Early Years Foundation Stage (EYFS)

As with all staff, EYFS staff and volunteers are given safeguarding training. They will have training specific to their setting, including identifying signs of possible abuse and neglect for EYFS children at the earliest opportunity. These may include:

- Significant changes in children's behaviour;
- Deterioration in children's general well-being;
- Unexplained bruising, marks or signs of possible abuse or neglect;
- Children's comments which give cause for concern;
- Any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or:
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

The School's policy on the use of mobile phones and cameras in the EYFS setting is set out as per the EYFS Statutory Framework and can also be found in the ICT Acceptable Use Policy for Employees, in the Staff Code of Conduct and includes the following:

- Any personal digital recording device including personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings;

- All mobile phones must be stored securely within the setting during contact time with children. (This includes staff, visitors, parents, volunteers and students – including the School’s sixth form mentors);
- No parent is permitted to use their mobile phone or use its camera facility whilst inside the EYFS setting. School policy regarding this matter should be explained clearly to Parents by the Head of EYFS;
- Mobile phones must not be used in any teaching area within the setting or within the bathroom area;
- In the case of a personal emergency staff should use the School telephone. It is the responsibility of all staff to make families aware of the School telephone numbers;
- Personal calls may be made in non-contact time but not within the teaching areas;
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. ONLY school equipment should be used;
- Photographs and recordings can only be transferred to and stored on a school computer before printing;
- All telephone contact with Parents/Carers must be made on the School telephone and should be recorded;
- During group outings, nominated staff will have access to the School mobile which can be used in an emergency or for contact purposes;
- In the case of school productions, Parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on Social networking sites.

The School will notify the relevant child protection agency of any serious accident or injury to, or the death of, any child while in their care, and will act on any advice from this agency.

18. Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status by either an individual or group. It takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity either in exchange for something the child wants/needs or for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, the power imbalance may also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given though, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children can be groomed by other children and/or exploited as part of gang-related activity. It does not always involve physical contact and can happen online. It can include both contact (either penetrative and non-penetrative acts) and non-contact sexual activity. It can even occur without the child’s knowledge through copying videos or images they have posted online.

CSE can affect any child or young person (male or female) under 18 years old including 16 and 17 year olds who can legally consent to have sex. It can be perpetrated by individuals or groups, males or females, adults or children (who themselves might be experiencing exploitation so might also be seen as a victim). The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organized abuse.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation under acronym SAFEGUARD:

- **Sexual Health and Behaviour:** Sexually transmitted infections; pregnancy; terminations; inappropriate sexualised behaviour.
- **Absence from school or repeatedly running away or going missing.**
- **Familial Abuse and/or problems at home:** Forced marriage or so-called honour-based violence; domestic abuse; substance misuse; parental mental ill-health; homelessness; privately fostered/looked after.
- **Emotional and Physical Condition:** Suicidal Ideation; self-harm; low self-esteem; confusion re sexual orientation; SEND; poor mental health; unexplained injuries or changes in appearance
- **Gangs, older age groups, involved in Criminality:** Direct involvement with gang members; involvement in criminal activity; involvement with older individuals including having older boyfriends or girlfriends or lack of same-age friends; contact with victims of CSE.
- **Use of technology, sexual bullying, and evidence of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos or other sexualised communication online; multiple phones; problematic use of internet/social networking.**
- **Alcohol or Drug Misuse.**
- **Receipt of unexplained gifts or money including mobile phone credit, clothes, jewellery money.**
- **Distrust of Authority Figures either in or out of school.**

Further information can be found on the NSPCC website and GOV.UK: [What to do if you suspect a child is being sexually exploited](#). Any concerns relating to CSE will be reported to the DSL who will follow safeguarding referral procedures.

Child sexual exploitation is widely unreported because it relies on the vulnerabilities of children in a way that makes them feel unable to share their experience with others. If staff find evidence that a child is being sexually exploited it is important they refer this to either the police or ECIRS or the equivalent if the child lives in a different Local Authority, depending on the urgency of the situation either themselves or through the DSL.

There are a number of things that we can do to prevent CSE and / or help other agencies to disrupt the activities of those engaging or intent on engaging in it. Via the curriculum and through engagement with parents and carers, we will raise awareness around healthy relationships and, where appropriate, CSE and grooming processes, including how this can happen online;

Information sharing is vital in identifying and tackling all forms of abuse and *especially* child sexual exploitation. We will be vigilant, seek advice, monitor attendance (particularly in cases of repeated or prolonged absence), keep robust registers, share information and contribute effectively to multi-agency processes designed to prevent, disrupt and / or prosecute perpetrators of CSE. We are also mindful of our contribution to processes designed to protect children who have been victims of CSE:

Physically - Making it as hard as possible for perpetrators to gain access to young people; face-to-face but also via phones, online etc.

Relationally - By ensuring that young people experience safe, stable relationships which counteract the abuse and, for Looked After Children, provide stability in terms of education and placements;

Psychologically - Helping young people to find a source of [positive] identity outside of abusive relationships. Also providing extra support to help maintain their educational attainment.

19. Child Criminal Exploitation (CCE), Serious Violent Crime, County Lines and Modern Slavery

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to

coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants and/ or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact and can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines *see below*), forced to shoplift or pickpocket, or to threaten other young people.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. All the factors involved in creating vulnerability to CSE (section 18) can also be found in CCE. Signs of involvement in any of these activities may include increased absence from school whether by exclusion or not, having experienced child maltreatment, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries and involvement in offending. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. If any of these warning signs are noticed by a member of staff, they should enter them onto MyConcern and talk to one of the DSLs or the relevant Head of Year. As always in child protection and care, early intervention is the most effective way of helping potentially vulnerable children.

St Benedict's looks to prevent violence within school or student involvement outside school through a number of methods:

- Our PSHE curriculum and regular discussions with tutors include information about how to be safe around London, how to deal with dangerous incidents and avoid exploitation by potentially dangerous groups.
- Aggressive behaviour is challenged rigorously by our behaviour policy.
- Using MyConcern; we are able to identify and support students who might potentially be vulnerable to violence or being drawn into violent behaviour of gangs outside school.
- St Benedict's always ensures to pass on any safeguarding information to other institutions when students leave us, and to get information from other institutions concerning students who join us.
- We work closely with the local council services and the police with regards to dealing with anti-social behaviour or crime in the area.

County Lines and modern slavery

Often related to serious violent crime, and a growing national risk for vulnerable children across the country is 'county lines' activity. 'County lines' is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone line or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can be targeted and recruited in school as well as other places. They are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection. Children can become trapped into this exploitation by gangs creating drug debts and can threaten serious violence or kidnapping towards victims or their families if they attempt to leave the county lines network.

Potential involvement in county lines can be identified by episodes of missing home and/or school when the victim may have been trafficked and a referral to the National Referral Mechanism should be considered in these cases. Other possible indicators are being the victim or perpetrator of violent crime, being involved in drugs, are found in accommodation where they have no connection (called a 'trap house' or 'cuckooing' owe a 'debt bond' to their exploiters or have a bank account to facilitate drug dealing.

Involvement in these forms of crime is extremely risky for any child, not just because of the potential for a criminal record but also because of the even more serious risk of physical and/or sexual abuse of children by gangs with which they might become involved. The advice for schools on these issues can be found in [Advice to Schools and colleges on gangs and youth violence](#), and [Criminal exploitation of children and vulnerable adults: county lines](#).

Potentially linked with this is the issue of modern slavery. This encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in [Modern Slavery Statutory Guidance](#).

20. Honour Based Abuse

So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage) 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. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in KCSIE and [Multi-agency guidelines: Handling case of forced marriage](#).

Forced Marriage

Forced marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other forms of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional or psychological. This is different from an arranged marriage where the couple still have the right to accept the arrangement.

If staff have a concern regarding a child that might be at risk of HBV, they should follow procedures for other safeguarding concerns as seen in Flowchart 1.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is prohibited by law in England, Scotland and Wales, whether it is committed against a United Kingdom national or permanent United Kingdom resident in the UK or abroad. FGM is an abuse of the human rights of girls and women and therefore a child protection issue.

Teachers **must** personally report to the police (by ringing 101) cases where they discover that an act of FGM appears to have been carried out. They should also still consider and discuss any such case with the DSL and involve children's social care as appropriate. Contact must be made with ECIRS 24 hour line on 020 8825 800 or the equivalent if the child lives in another Local Authority. The duty to contact the police does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have

been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over although cases like this will be discussed by contacting ECIRS. Further guidance can be found in [Multi-agency statutory guidance on FGM](#).

21. Radicalisation /Extremism

Children are vulnerable to extremist ideology and radicalisation and as with other forms of harm or abuse protecting children from this risk is part of our safeguarding duty. Any potential concern regarding Radicalisation or Extremism should be noted on MyConcern to alert the DSL and pastoral team. A decision will then be made about whether it should be directed to ECIRS (or the equivalent if the child lives in a different Local Authority) who will contact the Prevent Team.

St Benedict's uses the Governmental accepted definition of extremism as:

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

And radicalisation as:

'The process of a person legitimizing support for, or use of, terrorist violence.'

And terrorism as:

'An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'

There is no place for extremist views of any kind in our school, whether from internal sources – pupils, staff or Governors, or external sources - school community, external agencies or individuals. Our pupils see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

Extremism and exposure to extremist materials and influences can lead to poor outcomes for children. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. As part of wider safeguarding responsibilities, school staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Pupils accessing extremist material online, including through social networking sites;
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools or settings;
- Pupils voicing opinions drawn from extremist ideologies and narratives. Also, use of extremist or 'hate' terms to exclude others or incite violence;
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
- 'INCEL' (Involuntary Celibate) material online that is extremely misogynistic and promotes violence against women.
- Attempts to impose extremist views or practices on others;
- Anti-Western or Anti-British views.

In line with the Counter-Terrorism and Security Act (2015), the Heads and Governors, delegated to the DSL, assess the risk of children in the School being drawn into terrorism, including how likely they are to be exposed to extremist ideas that are part of a terrorist ideology.

When the School hosts visiting speakers, there are clear, set protocols for ensuring that these are suitable and appropriately supervised (see Appendix 5). Our School will work in partnership with other agencies: co-operate productively, in particular, with local *Prevent* co-ordinators, the police and closely follow any procedure as set out by Ealing Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

The School's ICT policies contain robust procedures and practice to ensure children are safe from extremist material when accessing the internet in school, including by ensuring suitable filtering is in place. All staff have had *Prevent* training to:

- Have the knowledge and confidence to identify children who are at risk;
- Be able to challenge extremist ideas used to legitimise terrorism;
- Know where and how to refer children and young people for further help (including the local police or by dialling 101);
- Ensure that our children remain safe online with a priority on robust ICT protocols and procedures as well as having appropriate levels of filtering on the Internet;
- Manage its prayer and faith facilities with a clear policy on cover arrangements and any issues that arise, including how access is managed after hours.

St Benedict's will normally discuss any concerns in relation to possible radicalisation with a child's parents as they are in a key position to spot signs of radicalisation. This will not happen if there is a specific reason to believe that to do so would put the child at risk. Families who raise concerns themselves will be supported.

Channel is a voluntary and confidential support program aiming to provide early stage support for those identified as vulnerably to radicalization/terrorism if they consent to it. *Prevent* referrals might be massed to Channel, and St Benedict's will support engagement with this. If a student in Channel is going to a new school the DSL will share their participation in Channel with the new school so that they continue supporting their participation.

22. Child abduction and community safety incidents

Child abduction, the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, can be committed by anyone and is just one example highlighted by KCSIE of safeguarding concerns that can arise for students outside school.

Other 'community safety incidents' in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. St Benedict's educates its students in the PSHE program about how to keep themselves safe and adapts these lessons to the different age and independence of students, for example, as they start walking to school on their own. Lessons look to build children's confidence, abilities and resilience rather than simply warning them about all strangers.

Another possible issue from outside school that could occur for children is homelessness. It is not likely to occur for a family whose children attend a fee-paying school but homelessness might also occur with children living independently from their parents/guardians, for instance if they are excluded from the family home. Guidance

in instances such as this can be found in Appendix B of KCSIE.

23. Whistleblowing

All staff should feel able to raise concerns about poor practice or potential failures in the School's safeguarding, and are required to report to the Head any concern or allegations about school practices or the behaviour of colleagues. This is in accordance with the Whistleblowing Policy found in the staff employment manual.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. 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.

Appendix 1: The Role of Designated Safeguarding Leads

St Benedict's has a number of Designated Safeguarding Leads (DSLs) to support staff in carrying out their safeguarding duties and liaising with external services. They are members of the leadership team with the necessary status and authority to be responsible for matters relating to child protection and welfare throughout all areas of the School, which is a very significant level of responsibility. St Benedict's ensures that the safeguarding leads have appropriate status and authority as well as sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively and they regularly attend safeguarding seminars as well as taking the statutory training required every two years. Their responsibilities are included in their job description. During term time a safeguarding lead will always be available (during school hours) for staff and pupils in the School to discuss any safeguarding concerns. In the School holidays main reception at school will always be able to contact a DSL if necessary by either phone or email.

The Senior Designated Safeguarding Lead for the Senior School is **Mr Luke Ramsden**, the Deputy Head. He has ultimate lead responsibility for safeguarding and child protection in the Senior School and is answerable to the Head. **Mrs Aine Yue**, and **Mr Micheal Foley** are the deputy DSLs for the Senior School. The Designated Safeguarding Lead for Key Stage 1 and Key Stage 2 is **Ms Lana Powell**, Assistant Head of the Junior School. The Designated Safeguarding Lead for Early Years Foundation Stage is **Mrs Moira Edwards**, Head of Early Years Foundation Stage. The deputy DSL for the Key Stage 1 and 2 and early years is **Mr Robert Simmons**, Head of the Junior School. The DSLs meet regularly to discuss safeguarding issues across the whole campus and they also have safeguarding supervision to support them in their work.

A number of other members of staff at St Benedict's, including all the heads of year in the Senior School have also been trained to Level 3 Safeguarding and can act in place of a DSL. If the DSL is unavailable or is him/herself the subject of a complaint, his/her duties will be carried out by another DSL or another member of staff who has received level 3 training.

The areas of responsibility of the DSLs are:

Acting on Safeguarding issues

- To advise and act upon all suspicion, belief and evidence of abuse reported to them;
- To be the first point of contact for parents, pupils, staff and external agencies in all matters of child protection and safeguarding.
- To ensure that appropriate action is taken in the School and that procedures are followed in all actual or suspected cases of child abuse. To contact ECIRS or the LADO within twenty-four hours to seek advice on

safeguarding concerns brought by staff or pupils. Also, to also check whether or not the pupil or pupil's family involved is known to social services and to continue to liaise with external agencies that are involved in supporting the welfare of a child and where appropriate work with Family Information Service (FIS) to complete an EHAP;

- To be aware of the differentiation between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies (see Flowchart 1) and the Ealing Thresholds of Need Guide;
- To make referrals under the Prevent duty to ECIRS and through them to the Channel programme where appropriate;
- To keep the Head informed of all actions. (unless the Head is the subject of a complaint - In this situation, the DSL should consult with the Chair of Governors or in his absence, the Governor with responsibility for Safeguarding;)
- To understand the risks associated with online safety and also the additional risks faced by SEND students and students with mental health problems online, for example from online bullying, grooming or radicalisation. Also to have the up to date capability to keep children safe online at school, in particular understanding the filtering and monitoring systems and processes in place at St Benedict's.
- To liaise with other agencies such as the police including ensuring that students have an [Appropriate Adult](#) where they want it if speaking to the police or arrested. Also, DSLs liaise with the LADO on behalf of the School, co-ordinate child protection procedures and to have a working knowledge of the Local Authority's safeguarding procedures and the School's Child Protection and Safeguarding Policy and procedures;
- The DSLs understand who to contact in the event of an incident of sexual violence or harassment as per KCSIE as these concerns go to ECIRS and/or the police if appropriate.
- To deal with issues arising from, or relating to, historical allegations;

Longer term support and training

- To undergo training in safeguarding to be updated every 2 years (with refresher training at least annually through, for instance, meeting other DSLs or taking the time to read about safeguarding developments), and also Prevent awareness training focusing on how to identify, understand and respond to specific needs that can increase vulnerability.
- To ensure that all staff have training in child protection and access to the School's child protection policy so that they fully understand part one of KCSIE as well as regular reviews of their own practice and opportunities to discuss any concerns they may have about safeguarding matters. This includes making sure staff are aware of the importance of information sharing, as well as training opportunities outside the School and local safeguarding policies. It is good practice for other members of staff to contribute to this training where appropriate. This will include training in how to refer cases of suspected abuse to the local authority children's social care as required (or the police if a crime has been committed) and also in the Prevent duty. All staff, volunteers and Governors will be trained in the Prevent duty and how to refer cases to the Channel programme where there is a radicalisation concern as required;
- To encourage a culture of listening to children and taking their wishes into account among the staff in any measures the School might put in place. Also understanding the difficulties that children will have approaching staff with problems and taking time to consider how to build trusted relationships which facilitate communication.
- To promote supportive engagement with parents and carers in safeguarding to promote the welfare of children, and to make them aware of the fact that referrals about suspected abuse or neglect might be

made, especially where families may be facing difficult circumstances. Also to ensure the child protection policy is always available on the School website.

- To liaise with the senior mental health lead where safeguarding concerns are linked to mental health (in fact at the moment the lead DSL is also the senior mental health lead).
- Where appropriate, to take part in the child protection conferences or reviews. If the DSL cannot attend they will ensure that another of those responsible for Pupil Welfare and Safeguarding will attend. More broadly to keep a strong link with ECIRS as our local safeguarding agency and other external agencies, understanding the importance of providing information and support to ECIRS to safeguarding and promote the welfare of children at St Benedict's.
- Together with the Head and School Leadership, annually to review the School's Policy on Child Protection and Safeguarding and in each term look at how the duties have been discharged, and to report on this to the Governing Body. A report will be given termly to the Governors Safeguarding Committee and the reports will be viewed by all Governors annually as part of the Safeguarding training for Governors. Any deficiencies or weaknesses in regard to child protection arrangements will be remedied without delay;
- In addition, having lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children are facing and identifying the long-term impact this might have on attendance, engagement and achievement. In particular, understanding the academic progress and maintaining high aspirations for children who have or have had a social worker. Also supporting the teaching staff in knowing who these students are, and in providing additional academic support and/or reasonable adjustments to help them reach their potential even after they no longer have a social worker.
- Where children leave the School, the Designated Safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This is transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained. Beyond purely safeguarding concerns the DSL will share pastoral information needed to help the new school put in place the right support for the child to be safeguarded and supported to thrive in their new school;
- To refer cases to the Disclosure and Barring Service as required where a person is dismissed or has left due to risk/harm to a child;
- To monitor the keeping, confidentiality and storage of detailed, accurate and secure written records in relation to child protection. Also to promote the use of MyConcern as the central online database for safeguarding records and train staff in its use in line with the Data Protection Act 2018. This ensures that Pupil Welfare and safeguarding issues are managed centrally while allowing only the relevant staff to contribute efficiently and effectively. Records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolve and a note of action taken, decisions reached and the outcome, including instances where referrals were or were not made to another agency.

Appendix 2: Safer Recruitment

St Benedict's has a culture of safe recruitment, and makes its decisions about the suitability of employees based on the checks and evidence as set out in part three of KCSIE which provides a clear chronology of requirements and best practice with regard to staff recruitment, and also ISI Regulatory Requirements.

1) Recruitment and selection

The Governors create a strong safeguarding culture at St Benedict's with a robust recruitment procedure to deter and prevent unsuitable people from applying to, or being employed by, St Benedict's. All recruitment

panels will include at least one person who has received safer recruitment training.

Adverts for positions at St Benedict's include the safeguarding requirements of the role as well as the School's commitment to safeguarding, and whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. As suggested in para 226 of KCSIE an online search on shortlisted candidates might be carried out as part of due diligence.

Application forms for roles in **regulated activity** (that is staff regularly teaching or caring for children when unsupervised or with other opportunities for regular contact with children such as personal care or healthcare or any overnight activity see [Factual note on regulated activity in relation to children](#) and further explanation in Annex E of KCSIE) include a statement that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. Application forms also refer to a link to the child protection policy on the School website. A CV should not be accepted in place an application form, and applicants must provide:

- Personal details, current and former names, current address and national insurance number.
- Employment details including reasons for leaving and a full employment history since leaving school including reasons for any gaps in employment. Verification should be obtained of an individual's most recent relevant period of employment where the applicant is not currently employed.
- Details of referees. Open references should not be accepted. The applicants should not obtain the reference. References should be from the candidate's current employer and be from a senior person – in the case of a school referee the head should confirm the reference is accurate in respect to disciplinary investigations. A reference should come from the relevant employer from the last time the applicant worked with children if not currently working with children or from their current employer if they have never worked with children. Electronic references should always be checked to ensure they originate from a legitimate source.
- A statement of how they meet the person specification
- A declaration confirming that the information they have provided is true

At least two people carry out shortlisting and they should explore all potential concerns, for instance inconsistencies or gaps in employment. Information should be compared between the application form and references. Referees should be contacted to clarify where information is vague or insufficient. Shortlisted candidates will be asked to complete a self-declaration of criminal record or other information that would make them unsuitable to work with children. Online searches also may be done on candidates shortlisted, and the candidates will be informed of this.

Interviews should ask the candidate's motivation for working with children, ask about their experience and skills of working with children and probe any gaps in employment. Areas that might be of concern from a candidate would be indicators of negative safeguarding behaviours, any implication that adults and children are equal, a lack of recognition of the vulnerability of children, inappropriate idealization of children and inadequate understanding of appropriate boundaries between adults and children. Students should be involved in the recruitment process in a meaningful way. Any information about past disciplinary action or allegations should be considered and all information considered in decision making should be clearly recorded along with decisions made.

2) Pre-appointment checks

Governors must ensure that the following checks apply to all individuals appointed to engage in regulated

activity with children and appointments must be conditional on completion of these checks. The same checks also apply to volunteers (including Governors) working for the School as well as those in paid employment. These checks are:

- References, identity checks and interview information, including the candidate's mental and physical ability to carry out their responsibilities which should be checked at interview.
- The person's right to work in the UK. If the person has lived or worked outside the UK St Benedicts makes checks to ensure that any relevant events that occurred outside the UK can be considered (for details of this see paragraphs 239-241 of KCSIE)
- Professional qualifications. The Teacher Regulation Agency's (TRA) Employer Access Service should be used to verify Qualified Teacher Status.
- Enhanced DBS check. More details on types of DBS checks including for contractors and the DBS update service can be found in paragraphs 243-258 of KCSIE). Volunteers do not need to be re-checked if they have already had a DBS check but if there are any concerns a new DBS check will be obtained at the appropriate level.
- Barred list check for staff involved in a regulated activity. A separate children's barred list check should be obtained if an individual will start in regulated activity before the DBS is available.
- Prohibition from teaching check issued by the Secretary of State or any sanctions or restrictions imposed by the GTCE (for further details see paragraphs 259-261 of KCSIE). For staff who work in childcare provision a check that they are not disqualified under the Childcare (Disqualification) Regulations 2009.
- A self-declaration of 'Disqualification by Association' (see 11b below - for staff who work in early years' provision and those who work in later years' provision for children who have not attained the age of 8 and employees who are directly concerned in the management of such provision)
- A section 128 check (checking names of individuals barred from management of an independent school) for school Governors and staff in a management position (for further details see paragraphs 262-266 of KCSIE).

Records of these checks will be kept with HR in a single central record for all staff who work at the School including volunteers, Governors and supply/agency staff if applicable of pre-appointment checks as set out in paragraphs 274-280 of KCSIE. The date on which each check was completed will be kept for the identity check, barred list check, enhanced DBS check, prohibition from teaching check, further checks on people who have lived or worked outside the UK, check of professional qualifications, check to establish the person's right to work in the UK.

Every recruitment panel includes at least one member of staff who has undergone safer recruitment training under the scheme currently operated by The Department for Education with refresher training as required by Ealing Safeguarding Children Board.

When using staff from an agency or third party organisation, St Benedict's obtains written notification that they have carried out their own safeguarding checks including written notification that an enhanced DBS certificate and barred list check has been obtained. Where such an enhanced DBS certificate has disclosed any information St Benedict's must get a copy of the certificate from the agency. St Benedict's then checks that the person coming for work is the same person on whom the checks have been made.

Where using contractors St Benedict's will set out safeguarding requirements in the contract between the organization and St Benedict's to ensure that any contractor working in the School has been subject to an appropriate level of DBS check. No contractor for whom no checks have been obtained will be allowed to work unsupervised in the School.

In the case of self-employed staff working for St Benedict's the School will obtain a DBS check for them.

Trainee teachers paid directly by St Benedict's are checked as with any other employee. Where trainee teachers are fee-funded, the checks are carried out by the teacher training provider as with agency workers.

If a member of staff has not obtained their DBS certificate before they start work, they will be supervised appropriately, and all other checks including a separate barred list check will have been carried out.

In KCSIE, there is specific guidance that if anyone working in school, including supply teachers or volunteers, has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children' this should be taken into account for their suitability for employment. This might include incidents outside school not involving a child, for instance, domestic violence at home. It should be considered what triggered these actions and whether these actions could be triggered in a school context and be a potential risk.

3) Recording Information

St Benedict's follows regulations in maintaining a single central register (SCR) of pre-appointment checks. This covers all staff even if they work only for one day and members of the governing body. This register contains:

- An identity check.
- A barred list check.
- An enhanced DBS check request/certificate provided.
- A prohibition from teaching check.
- Checks on people who have lived or worked outside the UK.
- A check on professional qualifications.
- A check on the person's right to work in the UK.
- If the person's position involves 'relevant activity' i.e. regular sole charge of persons aged under 18.
- Section 128 check if relevant.
- Whether written confirmation for agency and third party supply staff has been received that the business supplying these staff has carried out the relevant checks and has the appropriate certificates, the date this confirmation was received and whether details of an enhanced DBS certificate have been provided.

The details of an individual are removed from the SCR once they no longer work at this school. Copies of DBS certificates and records of criminal information disclosed and documents used to verify identity, right to work and required qualifications are kept in each member of staff's personnel file.

4) Existing staff

In some circumstances St Benedict's needs to carry out new checks on existing staff if an individual moves from a post that was not regulated activity to one that is, where there has been a break in service of 12 weeks or more, or if there are concerns about an individual's suitability to work with children.

Appendix 2b: Disqualification from Teaching in EYFS

St Benedict's follows the legal guidelines that it is an offence for the School to employ anyone in connection with our early years or later year's provisions with children up to the age of eight who is disqualified from doing so. This applies to normal School activities and any before or after School clubs or activities. It is also a criminal

offence for a disqualified person to provide early or later year's provision or to be directly concerned in its management.

The criteria for which a person will be disqualified from working in connection with early or later year's provision are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

- Having been cautioned for, or convicted of, certain violent and sexual criminal offences against children and adults;
- Any offence involving death or injury to a child.
- Various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;
- Having had registration refused or cancelled in relation to childcare or children's homes;
- Having been disqualified from private fostering;
- Living in the same household as another person who is disqualified from registration for early or later year's provision, or living in a household where a disqualified person is employed (disqualification by association). A person does not, however, commit an offence if they do not know, or have no reasonable grounds for believing, that they live in the same household as a disqualified person, or in a household where a disqualified person is employed. A household is defined by the DfE as anyone sharing "living space", including the use of a shared kitchen. The responsibility on individuals is to provide the School with information about people in their household "to the best of their knowledge". This means that a person who lives in a shared house, renting with others, will not be expected to request this information from those with whom they are not overly familiar.

After making this declaration, staff will be under an on-going duty to inform the School if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or a future change in circumstances, will be treated as a serious disciplinary matter and may lead to dismissal for gross misconduct.

Appendix 3: Online Safety and cybercrime

Children and young people can be exploited and suffer bullying through their use of modern technology such as mobile phones and social networking sites. Technology can also provide the platform to facilitate harm such as child sexual exploitation, radicalisation, sexual predation or child on child abuse and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, advice for which can be found in government advice [here](#). The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm;
- **Commerce:** risks such as online gambling, inappropriate advertising, financial scams etc.

In order to minimize the risks to our children and young people, we have in place a firewall as a filter that prevents searching for inappropriate material online. In addition, St Benedict's can monitor what is being entered by students and the safeguarding leads are alerted automatically if inappropriate or concerning content is entered for them to follow up with the students either directly or through their heads of year or tutors. The School is

always careful that “overblocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding and the blocking of specific sites is always under review.

The Director of ICT and the Senior DSL manage the filtering and monitoring systems. “Smoothwall Filtering and Firewall” limits internet traffic based on categories and black lists. “Smoothwall Monitor” tracks pupils activities on any device that the software is installed and uses image and key logging to identify at risk behaviour or actions. There is monitoring of chats on Teams through the ‘Senso’ system. The Director of ICT and Senior DSL make an annual review of the provision that the School has in place by reviewing the incidents over the previous year and also talking to our providers following the outlines of the DfE document [Filtering and monitoring standards for schools and colleges](#). This annual review is also taken to Governors for their oversight in the Michaelmas term Governors safeguarding meeting which reports to the full governing board. This year we will also look to introduce the DfE free [plan technology for your school service](#).

Most monitoring or filtering concerns which arise on school computers or computers brought into school and connected to the School Wi-Fi are automatically logged on MyConcern (those on senso are added manually) and so are then dealt with by heads of year and form tutors with outcomes put on MyConcern. Parents in years 7-10 who wish can sign up laptops bought through the School to have monitoring and filtering to be able to alert school from home as well. MyConcern is reviewed termly as part of the Governors safeguarding meeting, providing another opportunity for Governor oversight of monitoring and filtering concerns.

The School also ensures that it meets DfE standards for [cyber security in schools](#) to help improve resilience against cyber-attacks. There is also training for staff including fake phishing attacks to help raise awareness about cyber security.

[Cyber security training for school staff - NCSC.GOV.UK](#)

As part of our limiting of any inappropriate use of technology students are not allowed to use their phones during the School day with the exception of sixth formers who can use their phones in the sixth form centre.

We have a whole school approach to online safety so that we can do our best to keep children safe online both in school and at home. We ensure that staff are aware of how not to compromise their position of trust in or outside the setting and are aware of the dangers associated with social networking sites. Online training for staff is considered as part of the overarching safeguarding approach and is updated annually. Given the rapid evolution of technologies there is an annual review of our approach to online safeguarding with an updated risk assessment.

Artificial Intelligence

The Department for Education has published *Generative AI: Product Safety Expectations* to support schools in using generative artificial intelligence (AI) safely. This guidance sets out how existing filtering and monitoring requirements apply to the use of generative AI tools in educational settings. We recognise that while AI offers new opportunities to enhance learning and improve efficiency, it also presents significant safeguarding risks if not introduced with care. These risks include exposure to inappropriate or biased content, misinformation, data privacy breaches, and the potential for students to rely on AI systems in ways that undermine their emotional wellbeing, safety, or academic integrity.

As with any new technology, the safeguarding of pupils remains paramount. We are committed to ensuring that any use of AI within the school is introduced thoughtfully and with full consideration of its potential risks and ethical implications. This includes robust staff training, age-appropriate digital literacy education for pupils, and a cautious approach to approving any AI tools for use. We will also ensure that filtering and monitoring systems are reviewed and adapted as necessary to reflect emerging AI capabilities.

Further detail on our approach can be found in our separate AI Policy, which outlines how generative AI is being incorporated into school life in a way that supports our educational mission while upholding the highest standards of safeguarding and pastoral care.

[Generative AI: product safety expectations - GOV.UK](#)

[Generative artificial intelligence \(AI\) in education - GOV.UK](#)

[Using AI in education settings: support materials - GOV.UK](#)

Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of our broad and balanced curriculum. There is particular focus on this in our PSHE curriculum. The School also organises Parents' Forums and information brochures as an awareness session for parents with regards to online safety. Online safety tips are included in the weekly Newsletter sent to parents. We expect all pupils to adhere to the safe use of the internet as detailed in our Online Safety and Anti-Bullying Policies.

Information and support

<https://www.thinkuknow.co.uk/> National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

<http://www.saferinternet.org.uk/>

<https://www.internetmatters.org/>

<https://www.pshe-association.org.uk/>

<http://educateagainsthate.com/>

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and is another possible safeguarding issue as children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. It is categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). They include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme, a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [National Cyber Security Centre - NCSC.GOV.UK](#)

Appendix 4: Attendance and the Admissions Register (children missing education) and Elective Home Education

For school policy regarding attendance and children missing school, please refer to the School attendance policy and government guidance, [Working together to improve school attendance](#). Benedict's follows this guidance which states that: *Good attendance is a learned behaviour, and the most effective schools recognise the importance of developing good patterns of attendance from the outset. Schools that have good attendance recognise that it is not a discrete piece of work but rather it is an integral part of the School's ethos and culture. In building a culture of good school attendance.'*

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective information sharing between the School and parents is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education either during term time or at a point of transfer to another school or college is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, sexual or criminal exploitation or radicalisation. It can also indicate mental health problems; substance abuse or other issues. Attendance is therefore discussed as a standing item in termly safeguarding meetings, and is part of the DSLs responsibility including evaluation of attendance and plans for improvement where needed. Similarly, a child being absent for prolonged periods or repeatedly can act as a warning sign for safeguarding issues so we follow up any such issues thoroughly. In case of serious attendance concerns St Benedict's will refer this concern to Ealing Social Services and the attendance team linked with them.

As found in the School's attendance policy, there is a rigorous procedure to check and deal with unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. The School has an admission register and an attendance register that is monitored daily and if attendance continues to be irregular without good cause then school will inform the local authority (for more details see the School's Attendance policy). There is also regular scrutiny of attendance data so that *we identify and provide immediate additional support to pupils or pupil cohorts that need it, and look at historic and emerging patterns across the School and develop strategies to address them.*

New students are put on the admission register at the beginning of the first day on which the School has agreed that the pupil will attend the School. If a pupil fails to attend on the agreed or notified date, the School will notify the relevant local authority at the earliest opportunity to prevent the child from going missing from education. The School will regularly request parents to inform them of any changes whenever they occur. This can assist the School in dealing with pupil welfare issues and any safeguarding issues if they arise. The admission register will include:

- The full name of the pupil;
- The full name and address of any parent with whom the pupil lives;
- At least two emergency contact numbers;
- The full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- The name of pupil's destination school and the pupil's expected start date there, if applicable; and the grounds under which the pupil's name is to be deleted from the admission register.

When a parent notifies the School of a change of address, the School will record the full name of the parent with whom the pupil will live, the new address and the date when they move that new address. If a parent notifies

school that their son/daughter will be attending another school, then the admissions register will note the name of the new school and that date on which they are due to start attending the School. When a new student arrives, St Benedict's will notify Ealing local authority within five days of them being added to the admission register, except for those starting at the beginning of the School's youngest year.

The School must inform the local authority where the child is resident if a pupil's name is going to be deleted from the admission register on certain grounds (and provide the authority with the information from the admissions register as above along with the ground) on which the pupil's name is to be deleted:

- When the child has been taken out of school to be home educated,
- When the family has apparently moved away,
- When the child has been certified as medically unfit to attend,
- When the child is in custody for more than four months,
- When the child has been permanently excluded.

Elective Home Education

Schools must inform their LA of all deletions from their admission register when a child is taken off role. Where a parent/carer has expressed their intention a child from St Benedict's with a view to educating at home we will work together with other key professionals and the parents/carers to meet and discuss the final decision to ensure that this is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable and/or has a social worker.

Appendix 5: Visitors on the School Site and using the School for non-school activities

Visitors on the School Site

Any visitor to the School site will have their identity checked at school reception and they will be required to wear a badge and to be supervised while on-site. This applies to visiting parents, contractors, visiting speakers and any other visitors. Visitors to school in a professional capacity will be asked if they have the appropriate DBS check but will not be asked to present it.

St Benedict's has visiting speakers frequently, and as part of our responsibility under Prevent we ensure that all talks are aligned to the ethos and values of the School and British values. We do this by ensuring that the Deputy Head and the HR department have background information about the speaker as well as a clear understanding of the purpose of the talk. The School will make prior contact with the speaker to organise this and supervise the speaker while they are on site. In the unlikely event of a speech not aligning with the values and ethos of the School and British values, immediate action will be taken by a member of staff to balance the information given. Each visiting speaker will be evaluated by the organiser and should they not meet the needs of our students then this will be clearly communicated to the visiting speaker/ institution by Deputy Head.

It is good practice for staff contractors working regularly in school with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role and, for instance, to know the identity of the DSL and the duty to pass on concerns.

Using the School for non-school activities

Where any of the facilities of school are rented out by the Governors to organisations or individuals they should ensure that appropriate arrangements are in place to keep children safe as set out in [Keeping children safe in out-of-school settings](#). When services or activities are provided by the governing body under the direct supervision or management of St Benedict's our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. St Benedict's will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the School or college on these matters where appropriate. Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. If St Benedict's receives an allegation about a safeguarding incident that happened when an individual or organisation was using our premises, we will follow our own safeguarding policies and procedures, including informing the LADO.

Appendix 6: Remote Learning and Alternative provision

KCSIE continues to apply during any times of remote learning for individuals or groups of students. The best interests and safety of our students always comes first. If anyone has a safeguarding concern, they should act immediately to pass on this concern as they would do normally using MyConcern and/or direct contact with one of the DSLs.

Mr Ramsden, as Senior DSL, has a school mobile and is always available on 07388 611193 as Senior Safeguarding Lead to consult if any issues involving students arise. If he is not available, staff should call the main school number 020 8862 2000 and your concern will be directed to the appropriate member of staff. Mr Ramsden continues to be responsible for safeguarding on the School site.

With regards to students' remote learning, St Benedict's will monitor participation in lessons and following up with parents and students where students are falling behind. Parents are asked in any case to contact the attendance email address as usual if their children are ill or unable to attend lessons for any other reasons.

If a member of staff or volunteer working remotely has a concern about another staff member or volunteer posing a safeguarding risk, they should contact the Head on 020 8862 2010.

Child on child abuse does not disappear during a period of remote learning, as it can just as easily happen online as in person. Additional information on keeping safe with online learning can be found in the protocols for online learning circulate to all staff, students and parents and copied in 'protocols for online video sharing and online classrooms' below.

All staff are trained annually in safeguarding, and the protocols for online learning have been circulated to all of them. In particular staff are aware of the need to look out for mental health issues for students' remote learning.

Exactly the same recruitment criteria will apply at St Benedict's if recruitment is done remotely.

Protocols for online video sharing and online classrooms

1. Both students and staff should be in a common space in their house wherever possible. (It is accepted that at this moment with houses often full, students might need to join classes from their own rooms).
2. Students and staff may dress informally but not casually – essentially the same as would be expected for an own clothes day in school.

3. Behaviour and conversation between students and between students and staff should be exactly as we would expect in school.
4. If a student misbehaves or becomes upset for any reason in an online session, their parents will be informed by email. In particular students must not record any of the classes being held online without the permission of a teacher, and misuse of any recorded video or images of teachers or other students will be taken very seriously and could potentially be a safeguarding issue.
5. If a student repeatedly misuses the School technology, then they may have to be banned from its uses in line with the School's Behaviour and ICT policies.
6. Microsoft Teams should not be used as a purely social medium between the students. It is for education purposes and if any discussions between students stray from academic relevance they will be shut down as there are many other social media platforms they can use to chat informally. As ever, any poor behaviour and language in student interactions will be dealt with in line with the School's Behaviour and ICT policies.
7. If anyone does have a concern about inappropriate use of the School's online resources or behaviour in online class or video, then they should report this immediately.
8. One to one counselling or pastoral conversations will be done by phone following best safeguarding practice.

Alternative Provision

Sometimes students are educated in Alternative Provision: The DofE defines Alternative Provision in [Arranging Alternative Provision](#) as 'education arranged by local authorities or schools for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education. It also includes education arranged by schools for pupils on a fixed-period exclusion, and those being directed by schools to off-site provision to improve their behaviour.'

We understand that where a student is with an alternative provision we continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. Unless a child is working at home under parental supervision we will obtain written information from an alternative provider of their safeguarding checks of those working at their establishment (that we would perform on our own staff) and gain written confirmation that this provider will inform us of anything that happens that might put the child at risk i.e. staff changes so that we can ensure appropriate safeguarding checks have been carried out on new staff.

We must always know where a child is based in school hours so will ask for records of the address of the alternative provider or other subcontracted provision. We will review this alternative provision regularly (at least half-termly) so we are assured of regular attendance and safety. If safeguarding concerns arise the alternative provision will be reviewed and ended if necessary.

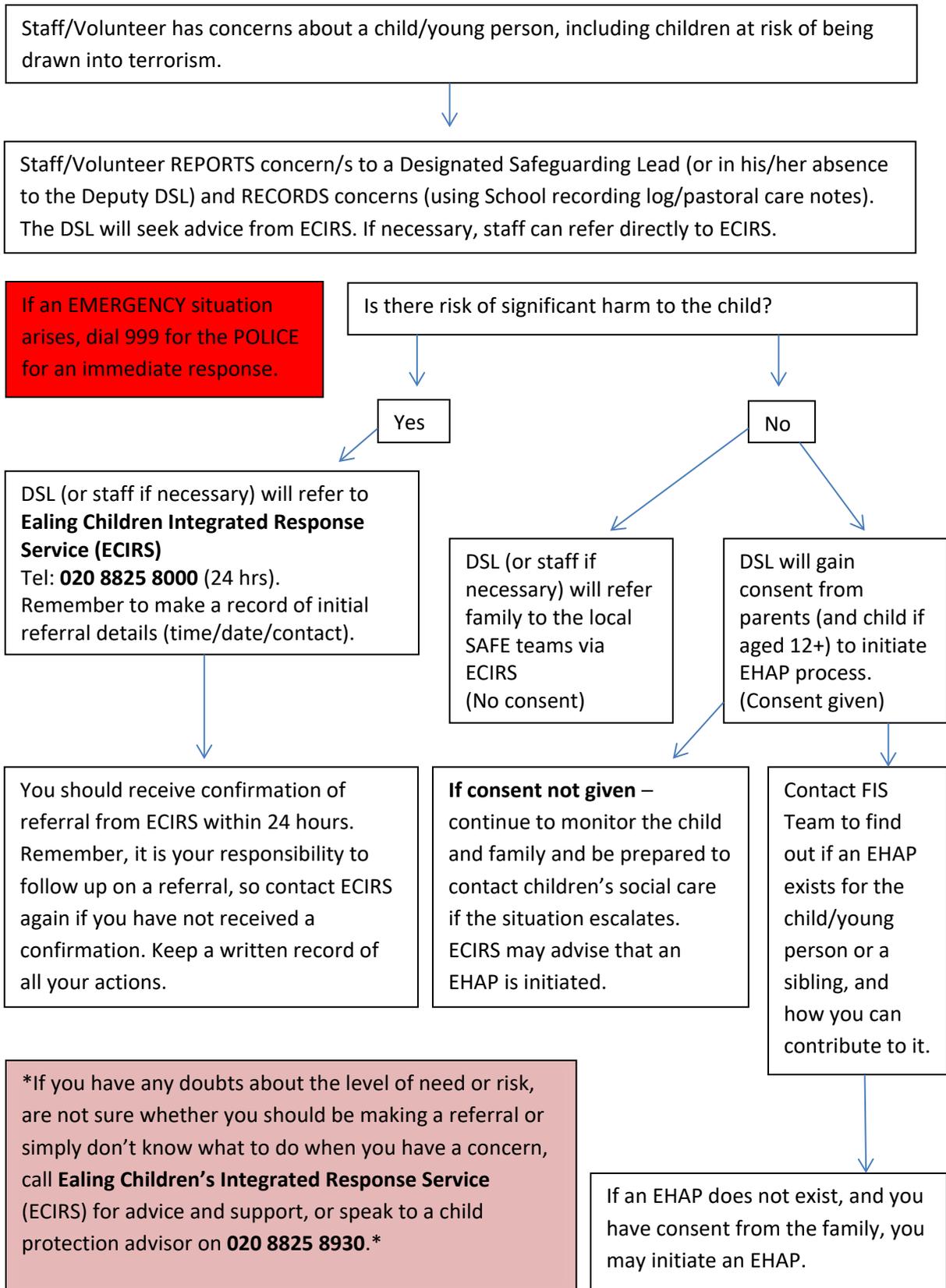
See also [Education for children with health needs who cannot attend school](#)

Appendix 7: Key Documents

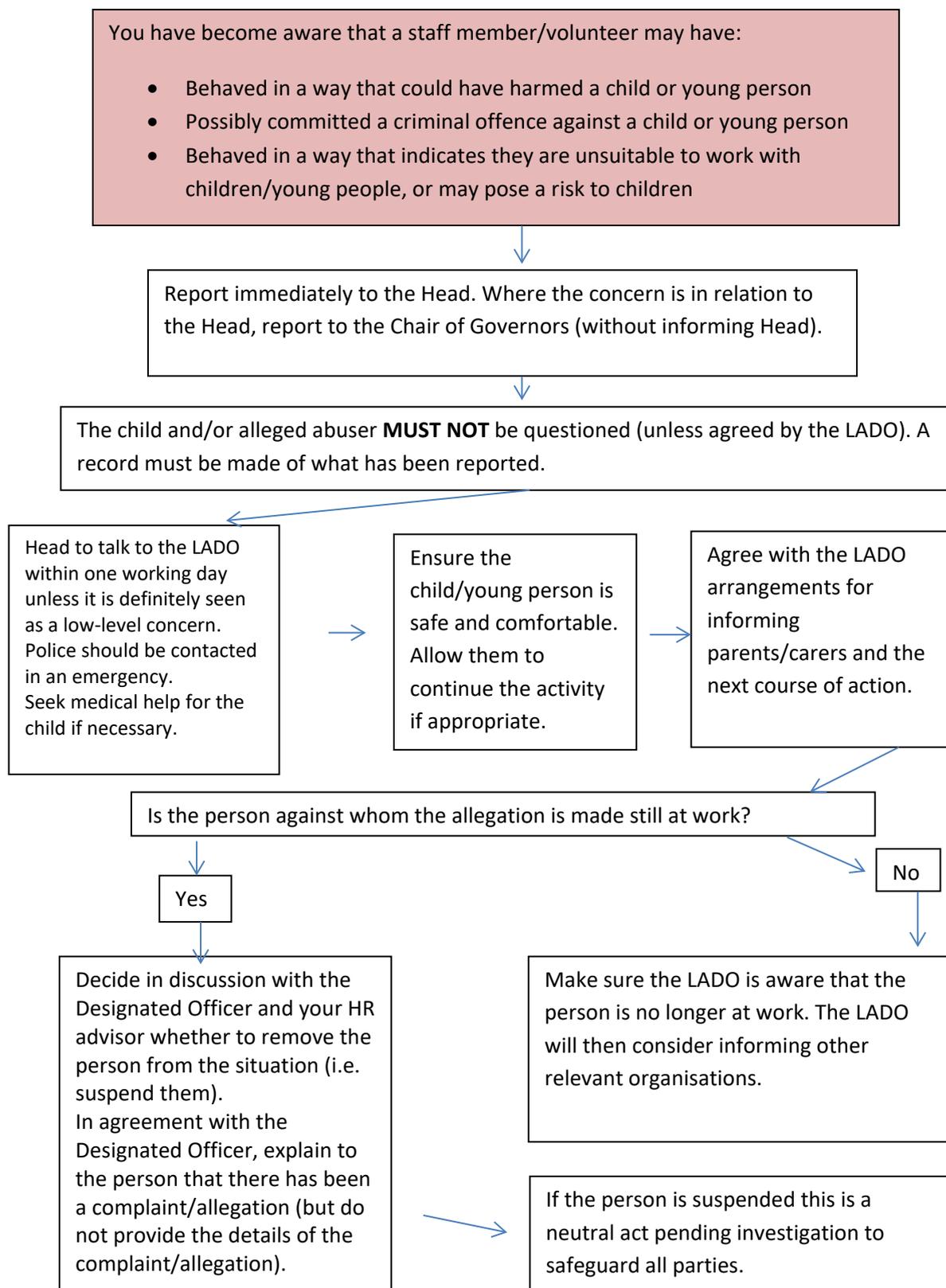
The DfE guidance that St Benedict's has regard to in this policy includes:

- [Keeping Children Safe in Education](#) (2025) (KCSIE)
- KCSIE incorporates the additional statutory guidance: [Disqualification under the Childcare Act](#) (2018)
- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (2015)
- [Working together to Safeguard Children](#) (2023) (WT)
- WT refers to the non-statutory but important advice: [Information sharing: advice for safeguarding practitioners](#) (2024)
- [Prevent Duty Guidance: For England and Wales](#) (2024) (Prevent)
- [The use of social media for on-line radicalisation](#) (2015)
- [What to do if you are Worried a Child is Being Abused – Advice for Practitioners](#) (2015)

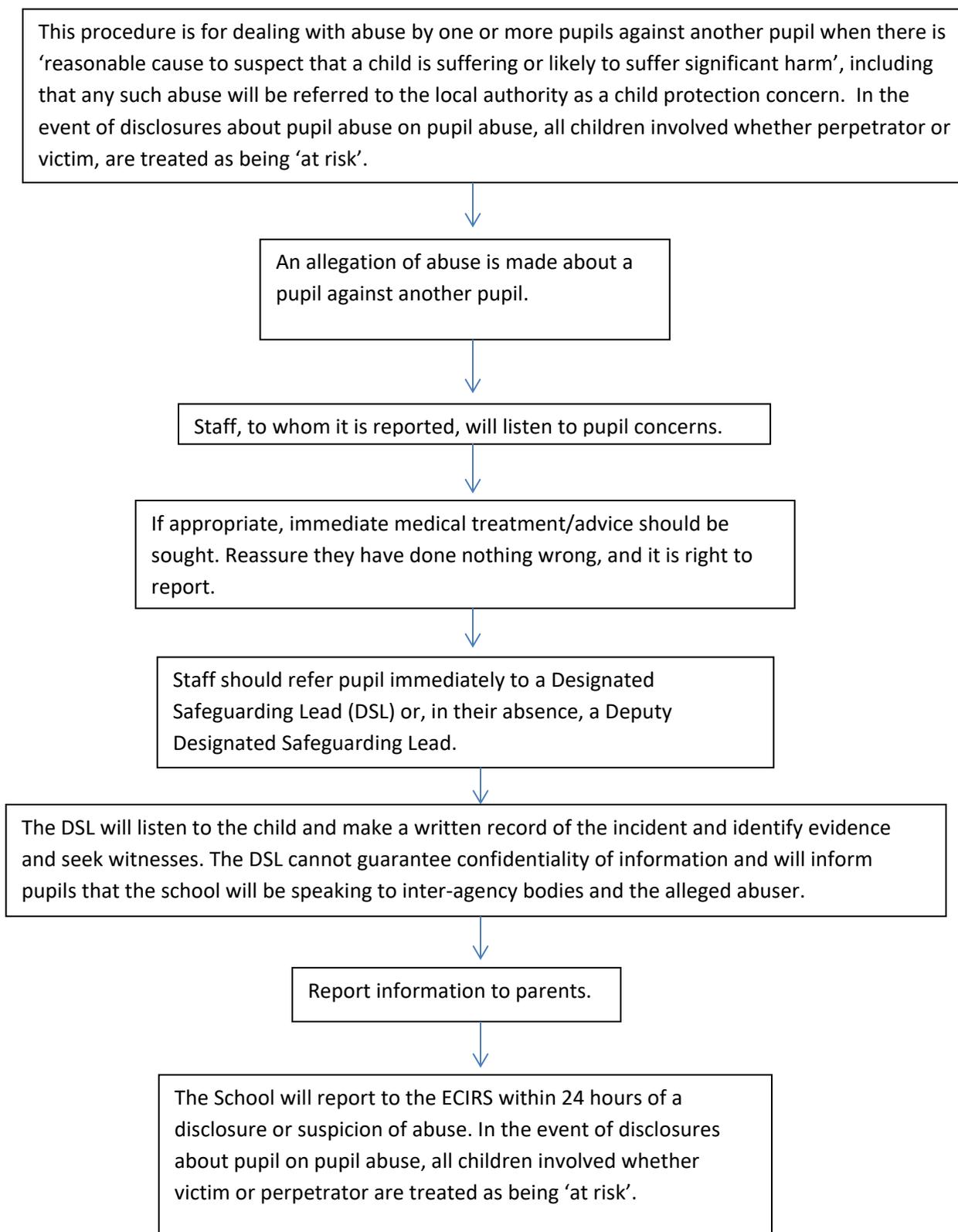
Flowchart 1: Dealing with Concerns about a Child/Young Adult



Flowchart 2: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School



Flowchart 3: Procedures for Dealing with Abuse by One or More Pupils Against Another Pupil



Flowchart 4: Online Safety Incident Raised by a Child/Young Person or Member of St Benedict's Sc

