



WEST LONDON
FREE SCHOOL

SAFEGUARDING POLICY

NOVEMBER 2021

RESPONSIBLE GOVERNOR
KATHRYN COOPER

RATIFIED BY LGB
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Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- **Protecting children from maltreatment**
- **Preventing impairment of children's 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 defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout this policy. 'Child Protection' is a part of Safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm.

1 Introduction

This policy sets out the West London Free School's and The Knowledge Schools Trust's commitment to Safeguarding the children in our school and describes in sections 2 and 3 the aims and scope of the policy. The Knowledge Schools Trust is the proprietor of the school for the purposes of Keeping Children Safe in Education. Section 4 details the key Safeguarding procedures, policies and available information to support Safeguarding throughout the school. In section 5 the policy describes our support for the child and how we partner with our parents and carers and section 6 outlines the responsibilities for those with a particular Safeguarding remit.

The West London Free School aims to protect and promote the welfare of its pupils.

We all recognise that abuse and neglect can and do happen, at home and elsewhere, and we are often the first to see the signs and we are individually and collectively responsible for making sure that these are acted on. We maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, we always seek to act in the best interests of the child.

We know that we must have robust procedures that make sure that everyone knows what actions to take and when and never lose sight of the child and of their immediate and longer term needs. To ensure this happens, the school commits that we will;

- Do our best to identify children who are suffering or are likely to suffer abuse and to act to protect and help them, working with other relevant services
- Set clear Safeguarding procedures and make sure that everyone in our school understands and follows them
- Reinforce our Safeguarding policy with strong policies for recruitment, for preventing and dealing with bullying and harassment, and for teaching children how to protect themselves
- Establish and maintain a culture that promotes self-worth, asking for help and supports those more vulnerable.
- Train our staff in the implementation of these and all other relevant to Safeguarding
- Review the outcomes of our work to make sure that we continue to strike the right balance.

We also recognise that there are often no easy solutions to Safeguarding problems. Making a referral is an important step, but our responsibilities do not end there. While solutions are being worked on, and afterwards, affected children will continue to come to school each day, and will continue to need attention in many ways. We must be sensitive and responsive to their continuing needs.

This Safeguarding policy was updated for September 2020 and has been developed in accordance with the principles established by the Children Act 1989 and 2004 and Education Act 2002 s.175. It reflects the current advice and guidance from the Department for Education and takes account of the new safeguarding partner arrangements which are in place from September 2019 and which are named as Tri-borough's Local Safeguarding Children's Partnership. In particular, the policy is consistent with the child protection procedures outlined in the following statutory guidance:

- Working Together to Safeguard Children (July 2019)
- What to do if you are worried a child is being abused Advice for Practitioners (March 2015)
- Use of reasonable force: advice for head teachers, staff and governing bodies (July 2013)
- Keeping Children Safe in Education (September 2020) (KCISE)

The first point of contact for any Safeguarding concern is the Designated Safeguarding Lead	
Designated Safeguarding Lead	Karla Philomon
Deputy Safeguarding Lead	Ben McLaughlin
Deputy Safeguarding Lead	Jerome Pereira
Deputy Safeguarding Lead - Sixth Form	Georgie Speller
Governor who has leadership responsibility for Safeguarding	Kathryn Cooper
Proprietor Lead for Safeguarding	Jane Emmett
Designated teacher for Looked After Children	Karla Philomon

2 Aims

This policy sets out the principles, procedures and advice from the Department which support the Safeguarding aims of our school, which are to:

- Support the child's or young person's development in ways that will foster security, confidence and independence
- Provide an environment in which children and young people feel safe secure, valued and respected, and feel confident and know how to approach adults if they are in difficulties
- Raise the awareness of all teaching and non-teaching staff of the need to safeguard pupils and of their responsibilities in identifying and reporting possible cases of abuse or neglect, and to be aware of signs of abuse in non-verbal children
- Provide a systematic means to monitor pupils known or thought to be at risk of harm, and to ensure the school contributes to assessment and support for those pupils alongside other agencies e.g. Social services, Children with Disabilities Teams, School Nurse, Education Welfare and the Police
- Emphasise and acknowledge the need for effective and appropriate communication between all members of staff in relation to Safeguarding pupils
- Develop a structured procedure and framework within the school that will be followed by all members of the school staff in cases of suspected abuse or neglect
- Develop and promote effective working relationships and appropriate information sharing with other agencies, especially the Police and the relevant Social Care team
- Teach children about Safeguarding and online safety as part of a broad and balanced curriculum. This includes covering relevant issues though Sex and Relationships Education and PSHE education which is undertaken at the West London Free School through our Great Conversations programme. See Annex C or KCSiE 2019 and the DfE Guidance RSE and Health Education Draft Statutory Guidance February 2019.
- Ensure that all staff-and volunteers at the school who have access to pupils, have current and appropriate DBS checks, their identity has been verified by original documentation and that required references are checked in line with Knowledge Schools Trust (KST) Safer Recruitment Policy.

It is recognized that children with special educational needs (SEN) and disabilities can face additional Safeguarding challenges. These can include:

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

- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.
- being prone to peer group isolation than other children

3 Scope

This policy applies to all staff, governors, volunteers and Trustees working in or on behalf of the school, including those in the central team, and we will make the policy available on our school's ~~web site~~ website.

4 Roles and Responsibilities

4.1 The Headteacher

The Headteacher will ensure that:

- the policies and procedures adopted by the West London Free School's Academy Trust and Local Governing Body associated with protecting children are fully implemented, understood and followed by all staff and adhered to at all times
- the nominated local Safeguarding link governor is made known to all staff
- sufficient resources and time are allocated to enable the school's Designated Safeguarding Lead and other staff to discharge their responsibilities
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed policies
- the responsibilities detailed in Appendix A Section 6 are fully carried out

4.2 The Designated Safeguarding Lead in the School

The Designated Safeguarding Lead (DSL) is the lead officer within the school for Safeguarding and is the most appropriate person to advise on the response to Safeguarding concerns. The DSL is familiar with the latest version of Keeping Children Safe in Education (2020) and with all the information contained therein, including the important additional information about specific forms or abuse and Safeguarding in Annex A in that publication. The DSL has the following responsibilities:

4.2.1 Raising awareness

The Headteacher will ensure that:

- the Safeguarding policy is known, updated and reviewed annually and the procedures and implementation are updated and reviewed
- the Safeguarding policy is available, and parents are made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school
- where children leave the school ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

4.2.2 Training

- Receive appropriate training carried out every two years
- Refresh their knowledge and skills regularly, but at least once a year, via for example e-bulletins, meeting other DSLs or spending time reading and digesting Safeguarding developments.
- Understand the assessment process for providing early help and intervention e.g. early help assessments
- Have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when requested to do so.

- Ensure each member of staff has access to and understand the School's Safeguarding policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers (s.17 CA 1989)
- Understand and support the school with regards to the requirements of the Prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Understands the risks associated with online safety and how to keep children safe whilst they are online at school
- Recognises the additional risk that children with SEN and disabilities (SEND) face online for example, from online bullying, grooming and radicalisation and has the capacity to support SEND pupils to keep safe online.
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings among all staff, in any measures the school may put in place to protect them.
- Ensure all staff members receive appropriate Safeguarding training refresher annually and updated training every 3 years.

4.2.3 Referrals and casework

- Act as a source of support, advice and expertise within the school;
- Refer all cases of suspected abuse to the local authority children's social care and:
 - The LADO for all cases which concern a staff member
 - DBS for cases where a person has left due to risk/harm to a child
 - The Police for cases where a crime may have been committed
 - The Channel programme where there are concerns about radicalisation
- Liaise with the Headteacher to inform of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigation
- Act as a source of support, advice and expertise to staff on matters of safety and Safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Ensure the school is represented at strategy meetings, child protection conferences, reviews, core groups and other multi-agency meetings
- Sharing information as appropriate with other agencies and contributing to assessments
- Ensure the school carries out their part of any child protection plan;
- Keep the Headteacher informed of issues and ongoing investigations with particular reference to paragraph 4.2, and ensure there is always cover for their role
- keep detailed, accurate, secure written records of all child protection concerns and any related referrals
- report annually to the Local Governing Body on child protection issues in the school

4.2.4 Records and reporting

- Where reasonably possible, the school will hold more than one emergency number for each pupil in order to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or Safeguarding concern.
- Child Protection records are kept in an appropriate and useful manner and treated as confidential information. The school uses CPOMS, a software application for monitoring child protection, Safeguarding pastoral and welfare issues. This system stores Safeguarding records and files securely online. Files are kept separately from pupil's general school records and information shared with those who need to have it. Reports will be objective and evidence based; they will distinguish between fact, observation, allegation and opinion.
- When a child leaves the school, the school will ensure that the child protection file is copied for the new school as soon as possible and transferred to the new school separately from the main pupil file. The DSL will also consider if it would be appropriate to share anything with the new school in addition to the child protection file e.g. if it will help the new school to support a victim of abuse. In the case of a child missing from education, home or care or if parents elect to home

educate then the child protection file will be copied and the copy forwarded to the Education / Social Care Service.

- In cases where the school receives a child protection file from another school, it will ensure that key staff such as the DSL and the SENCOs are aware as required.

4.2.5 Staff and volunteer education

- ensuring that staff and volunteers fully comply with the School's policies and procedures
- and attend appropriate training

4.3 The Local Governing Body

The Local Governing Body will require the Designated Safeguarding Lead to report on the measures they are taking to ensure compliance. Statutory responsibility does not pass to the Local Governing Body or any of its members; however, the Local Governing Body performs a vital role in monitoring compliance and challenging the school to ensure that best practice is followed.

The Local Governing Body will monitor the following that:

- the school has a Safeguarding policy and procedures in place that are consistent with DfE and Local Safeguarding Children Partnership guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request
- the school operates safe recruitment procedures, following the KST safer recruitment policy and makes sure that all appropriate checks are carried out on staff and volunteers who work with children and that relevant members of staff and governors are trained in safer recruitment.
- the School has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from DfE and locally agreed interagency procedures
- a senior member of the staff is designated to take lead responsibility for child protection (the Designated Safeguarding Lead) and that this person is not the Headteacher unless there are particular reasons for the Headteacher to be the Designated Safeguarding Lead for a fixed time period
- the Designated Safeguarding Lead undertakes training in child protection and inter-agency working to Local Safeguarding Children Partnership (LSCP) standards at two yearly intervals
- all staff who work with children undertake training in their Safeguarding responsibilities on a refresher basis annually and appropriate training carried out every 3 years
- a governor is nominated to be responsible for liaising with partner agencies in the event of allegations of abuse being made against the Headteacher
- a nominated governor is responsible for liaising with the senior management team to immediately remedy any deficiencies or weaknesses in the School's Safeguarding arrangements that come to the local governing body's attention
- where services or activities are provided on the School premises by another body, the body concerned has appropriate policies and procedures in place in regard to Safeguarding children and child protection and liaises with the School on these matters where appropriate
- Policies, procedures and the discharge of Safeguarding duties are reviewed annually.
- A designated teacher is appointed and should work with local authorities to promote the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This designated teacher must have appropriate training and the relevant qualifications and experience.

To support LGBs in their responsibilities, it is recommended that the Chair of Governors and the Safeguarding Link Governor should undertake the same Safeguarding training as staff and have that training refreshed in line with those members of staff.

5 Safeguarding procedures, policies and information

5.1 Abuse

All staff have a professional duty to act on suspicions of abuse, or reported allegations of abuse.

A child may be abused if someone inflicts harm upon them or fails to act to prevent harm. Harm is the ill-treatment or impairment of health and development including, for example, impairment suffered from seeing or hearing the ill-treatment of another. Health includes physical and mental health and development means physical, intellectual, emotional, social or behavioural development.

Abuse may take a number of forms..

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

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

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

Child Sexual Exploitation – is a form of child sexual abuse, It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

Children who:

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

Neglect – The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

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

Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. The concept of significant harm is the threshold that justifies intervention in family life in the best interests of the child.

There are no absolute criteria for what constitutes significant harm. Relevant factors include the severity of ill treatment, the degree of harm, the duration or frequency of abuse or neglect, and the presence of threat or coercion. A single traumatic event may cause significant harm, or a compilation of events which interrupt, change or damage the physical or psychological development of a child.

Specific Safeguarding Issues

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

All staff are aware that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when

activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Peer on peer abuse

All staff are aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which is now a criminal offence and typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Staff must be aware that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. In addition, it should be recognized that it is more likely that girls will be victims and boys will be perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously.

Allegations of peer on peer abuse will be recorded, investigated and dealt with by the DSL. Victims, perpetrators and any other child affected will be supported by pastoral and Safeguarding staff and referred for counselling and external support (such as CAMHS) if this is deemed to be necessary.

The school minimizes the risk of peer on peer abuse through information sessions delivered in assemblies, talks and Great Conversations/PDC lessons.

As of 1st April 2021, the NSPCC established a free helpline to support those who have experienced abuse in educational settings. This helpline provides advice and support for both children and adults; regarding their own experiences of abuse, or concern they have for others.

To contact the helpline, anyone can call 0800 136 663. The line is open 8.00 – 22.00 Monday to Friday (including bank holidays), and 8.00 – 18.00 over the weekends. Support can also be reached by emailing help@nspcc.org.uk, and more information on the helpline is available via the [NSPCC Website](#).

Sexting (youth produced sexual imagery)

Where sexting has taken place, the DSL will be informed, will inform the Headteacher and will investigate the matter. The school's Behaviour Policy will be followed, and Police may be informed. The DfE guidelines for searching, screening and confiscation will be followed, as well as the advice from the UK Council for Child Internet Safety (UKCIS).

A decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that he has enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and school sanctions framework.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or children's social care.

An immediate referral to police and/or children's social care will be made at the initial stage if:

- The incident involves an adult.

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- The imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- There is reason to believe a pupil is at immediate risk of harm as a result of the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

Serious violence

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

All staff are aware of the associated risks and understand the measures in place to manage these.

Female Genital Mutilation

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur.

County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drugs networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. All staff should be aware of indicators which may suggest that children are at risk of being exploited by gangs to distribute drugs, money and/or weapons. Signs of potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Honour based violence (HBV)

So-called 'honour-based' violence (HBV) encompasses 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 will be handled and escalated as such. If in any doubt, staff should speak to the DSL.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose

behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, and a formal record of that concern should be made via CPOMS.

COVID-19/Virus Transmission Prevention

The School's responsibility to Safeguarding all pupils and staff remains unaffected, in principle, by COVID-19 or any transmission prevention measures including during periods of remote schooling/partial closures. As per [Actions for Schools during the Coronavirus Outbreak – Guidance for Full Opening Schools \(2020\)](#), the West London Free School have in place:

- a requirement that people who are ill stay at home
- robust hand and respiratory hygiene (with additional facilities for hand sanitisation)
- enhanced cleaning arrangements (including day-cleaning of both sites especially contact surfaces)
- active engagement with NHS Test and Trace
- steps to reduce contact and maximise distancing between those in school wherever possible and minimise the potential for contamination so far as is reasonably practicable

In accordance with Government guidelines, the West London Free School has conducted a thorough Risk Assessment of each site, specific subjects (as appropriate) and any other activities/events. This has been made available to parents, pupils and staff. The measures outlined in the risk assessments produced by WLFS include but are not limited to:

- Pupil 'bubbles'
- Adjusted timetabling/rooming to create 'zones' and reduce cross-over between bubbles
- Adjusting roomings to reduce pupil movement
- Increased accessibility to hand sanitiser/sanitising stations

As per Government guidelines, these steps are 'sensible and proportional' and do not reduce teaching or access to the curriculum. In specific subjects and only where appropriate, alterations have been made in accordance with Government guidelines for effective and safe teaching e.g Music, Art, PE and Computing.

For further details of how the West London Free School continues its Safeguarding responsibility during and potential school closure (partial or full), please see Appendix F – Response to COVID-19.

5.1.1 Signs of possible abuse

Staff and other adults in the school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationship between staff, children, parents and the public which foster respect, confidence and trust can lead to disclosure of abuse and or our school staff being alerted to concerns.

Staff should also be aware that Safeguarding and incidents can be associated with factors outside the school and/or can occur between children outside the school. The DSL and deputies should consider the context within which such incidents and/or behaviours occur (this is known as contextual Safeguarding). Such contextual information should be included in social assessments if relevant.

All staff should also be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained

gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

The following list is not prescriptive, and many signs listed will not necessarily indicate abuse. They only act as a guide.

- Unexplained injuries, bruising etc.
- Unauthorized absences from the school that do not have a reasonable explanation or exhibit a suspicious pattern
- Significant change in behaviour
- Indications of hunger
- Issues of consistent personal hygiene
- Untreated medical conditions
- Watchful, cautious response to adults
- Aggressive or abusive to others
- Bullying other children or being bullied
- Under-achieving, unable to concentrate
- Avoiding removal of clothing in PE etc.
- Truancy, fabricating or stealing
- Inability to trust others and make friends
- Deterioration in general well being
- Comments or language from the child that cause concern

All staff should be aware that Safeguarding issues can manifest themselves via peer on peer abuse. This most likely to include, but may not be limited to:

- Bullying, including cyberbullying
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type of violence and rituals

Staff should also be aware that Safeguarding and incidents can be associated with factors outside the school and/or can occur between children outside the school. The DSL and deputies should consider the context within which such incidents and/or behaviours occur (this is known as contextual Safeguarding). Such contextual information should be included in social assessments if relevant.

5.2 Identifying & Raising Concerns

All staff have a duty to be alert to the potential indicators of abuse or neglect and aware of the risks potential abusers may pose to recognise concerns and to raise them with the school Designated Safeguarding Lead with responsibility for child protection. All concerns regarding the welfare of pupils will be recorded and discussed with the Designated Safeguarding Lead prior to discussion with parents. All staff will **immediately** report any of the following issues to the Designated Safeguarding Lead or Deputy Safeguarding Leads via CPOMS:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play/Daily physical activities, any explanation given which appears inconsistent, varied or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play, language)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including non-attendance/unauthorized absences
- any hint or disclosure of abuse from any person including a child.

- any concerns regarding person(s) who may pose a risk to children (e.g. living in a Household with children present)

Early Help

Any child may benefit from early help, but all school staff should particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan (EHCP))
- is a young carer
- is showing signs of being drawn to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in family circumstances presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child
- is a previously looked after child

The DSL (or one of the deputies) will generally lead on liaising with other agencies and setting up an inter-agency assessment if required for early help and may also act as the lead professional in some cases. All such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse. It is also important that all agencies work together, and prompt action is taken where necessary to safeguard previously looked after children.

Reporting concerns

If in exceptional circumstances, the Designated Safeguarding Lead (or one of the deputies) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or one of the deputies) as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Please see '[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)' (July 2018) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

For parents, carers and volunteers, issues can be reported in person, or via telephone (020 8600 0670) or via email (b.mclaughlin@wlfs.org) directly to the DSL. For staff and internal reporting, all incidents and concerns are reported via CPOMS and is accessed with staff login details. The individual reporting the concern may or may not be contacted again by the Safeguarding Team, according to the nature of the concern and what may or may not be discussed about the individuals identified in the email. Options then include:

- managing any support for the child internally via the school's own pastoral support process

- an early help assessment (see Chapter 1 of Working Together to Safeguard Children https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)
- a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer from harm.

Staff should not assume a colleague, or another professional person will take action and share information that might be critical in keeping children safe. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf for further information.

The school Designated Safeguarding Lead must advise the Headteacher of any Safeguarding issue which;

- Could result in, or has resulted in, a strategic case meeting being called by a Local Authority Designated Officer (LADO)
- Relates to a member of staff and, without prejudice to the case, the Designated Safeguarding Lead judges may result in disciplinary action being taken.



Appendix A contains detailed reporting procedures for the school.

5.3 Induction and Training

In recognition of the vital importance Safeguarding plays in our school, all staff receive Safeguarding and Child Protection training (including online safety) and are informed of the school's Safeguarding Procedures as part of their induction when they start at the school. They will receive refresher training annually or at reasonable periods which the West London Free School deems to be appropriate. Safeguarding Training for whole school staff and governors is delivered annually to ensure staff understand their role in Safeguarding young people. Induction and training are in line with advice from the Local Safeguarding Children Partners.

5.4 DBS

All new employees will undergo DBS checks before commencing work and employees with a break in service of more than three months will also be rechecked. All TUPE'd employees will have a DBS check when they join the school. In addition to staff, governors, Trustees, trainee teachers, contractors and volunteers will be required to have a DBS check. The checks undertaken are compliant with the requirements of Keeping Children Safe in Education (September 2020) Part Three: Safer Recruitment

The West London Free School reserves the right to repeat any check if any information is received that suggests a person may no longer be suitable for continued employment.

The Safer Recruitment Policy of the Knowledge Schools Trust contains information on Staff Recruitment, including Safer Recruitment and pre-employment checks that are undertaken by the Knowledge Schools Trust for the school.

5.5 Information and guidance

Staff should also be aware that school specific guidance is available in Appendix A on the following topics:

- The school's Behaviour, Anti-Bullying, Rewards, Appearance and Uniform Policy
- Images
- Sexual violence and sexual harassment between children/peer on peer abuse
- Attendance/Children Missing from Education
- E-Safety
- Whistleblowing
- Use of Physical Intervention /Positive Handling
- Staff Code of Conduct and ICT Acceptable Use
- Safeguarding -Reporting procedures for staff.
- Safeguarding Response to children who go missing from education
- Safeguarding -Complaints against a member of staff.
- Management of Safeguarding (including Responding to Disclosures and a protocol for interacting with third parties)

Appendix B contains a list of key Safeguarding documents published by the Department for Education.

Appendix C signposts staff to expert guidance by professionals on specific Safeguarding issues. Live links to the guidance are contained in Keeping Children Safe in Education (September 2019), Part one.

Appendix D contains a list of school policies to be considered and read in conjunction with this policy

Appendix E contains information on staff recruitment and pre-employment checks, including checks on school governors.

5.6 Keeping Children Safe in Education

This document sets out the statutory duties schools must follow and includes guidance on mandatory reporting requirements. All staff must read Section 1 and Annex A as a minimum. It is advised that this is read alongside **Working Together to Safeguard Children** which is the statutory guidance on inter-agency working to safeguard and promote the welfare of children

Staff should ensure they understand and are familiar with their responsibilities and where this includes mandatory reporting expectations, they understand their role and any locally agreed procedures for reporting, such as informing the Designated Safeguarding Lead.

Staff should be aware of the personal reporting duty with regard to known cases of female genital mutilation (FGM). All staff should speak to the DSL (or deputies) with regards to any concerns about FGM and there is a specific legal duty on teachers re FGM. If a teacher, in their course of work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Supplementary to Keeping Children Safe in Education, staff can obtain further guidance in the '**Mandatory Reporting of Female Genital Mutilation – procedural information**' document which is available here

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Staff should refer any concerns about another member of staff to the Headteacher, or if the concern is about the Headteacher to the Chair of Governors or equivalent.

Staff should raise concerns of poor or unsafe practice or potential failures in Safeguarding, using the school's whistleblowing policy.

5.7 Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, staff must have 'due regard to the need to prevent people from being drawn into terrorism'

Staff should refer any concerns regarding radicalisation to the school's Designated Safeguarding Lead or a senior member of staff, following the school's normal Safeguarding procedures. All visiting speakers to the school are checked to ensure their suitability and are supervised by a member of staff.

Relevant staff should understand when it is appropriate to make a referral to the Channel programme, a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

Staff receive annual Prevent awareness training.

5.8 The School Designated Safeguarding Lead (DSL)

The DSL at the West London Free School is Ben McLaughlin. He will ensure, in conjunction with the priorities of the Local Children Safeguarding Partnership (LSCP) that all staff are made aware of the contents of these appendices in line with the prevalent Safeguarding issues in the local area. This includes working with the school to embed British values in line with the school's ethos.

6 Supporting the child and partnering with parents

The school recognises that the child's welfare is paramount, and that good child protection practice and outcomes are helped by (but are not solely dependent upon) having a clear understanding of the needs and views of children, and a positive, open and honest working partnership with parents.

We will provide a secure, caring, supportive and protective relationship for the child.

Children will be asked for their views and each child will be heard, although it will be explained that while their views will be taken into account, there is a professional responsibility to take the action that

is necessary to ensure the child's safety. Children will be given a proper explanation (appropriate to their age & understanding) of what action is being taken on their behalf and why.

While, on occasion, we may need to make referrals without consultation with parents (this will usually be in cases where to contact the parents would put the child at greater risk), we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child, acting with the advice of the Social services/Local Authority Designated Officer (LADO) as appropriate.

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. Issues relating to confidentiality will be overridden by concerns about a child's safety. The Headteacher or Designated Safeguarding Lead will determine which members of staff need to know personal information and what they need to know to support and protect the child. They will ensure that the appropriate members of staff in particular to the child is aware of any issues which they may need to know so they are best able to support the child.

7 Adoption of this Policy by the school's LGB

The school is able to add to this policy when it is adopted by the LGB but cannot remove elements or rewrite the policy in full or in part other than for stylistic or presentational purposes.

APPENDIX A

How the West London Free School addresses specific issues relating to Safeguarding:

1 Anti-Bullying

1.1 The West London Free School defines bullying as deliberately harmful behaviours, which repeatedly, over time, target a specific person(s) for whom it is difficult to defend themselves. This does include online/cyberbullying. There are many such harmful behaviours, however the three main types are:

- Physical (e.g. hitting, kicking, theft),
- Verbal (e.g. racist, sexist or homophobic remarks, threats, name-calling), and
- Emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

1.2 The West London Free School aims to create a positive learning environment which promotes the development of children in the fullest sense and their learning and success in school. The West London Free School believes bullying is anti-social, it affects everyone in the community and therefore, it will not be tolerated. Anti-Bullying is covered by the school's Behaviour, Anti-Bullying, Rewards, Appearance and Uniform Policy to be found here:

http://www.wlfs.org/docs/Behaviour_Rewards_Antibullying_Appearance_and_Uniform_Policy_FIN_AL.pdf

1.3 Pupils who have been bullied, or who have witnessed bullying, may demonstrate any of (but not limited to) the following: changed behaviours (including possibly becoming nervous or shy), absenteeism or truancy, feigned illnesses, self-harm.

1.4 All school Staff must be alert to the symptoms and signs of bullying and report them, in accordance with school procedures, to a middle or senior leader with responsibility for pastoral care.

1.5 The West London Free School aims to establish a culture of trust with pupils, parents and staff. All are encouraged to share concerns about any aspects of school-life with senior teachers.

1.6 When an incidence of bullying is found to have occurred, the school will take the following steps to support the victim(s):

- Providing the opportunity to be referred for in-school therapy or counselling
- Providing the opportunity to speak with a member of staff of their choosing

- Informing key staff to ensure supervision, monitoring and support across the school
- Providing the opportunity for a structured reconciliation meeting led by senior staff
- Providing the opportunity for parents to discuss the matter and its implications with senior teachers

1.7 When an incidence of bullying is found to have occurred, the school will take the following steps to address the perpetrator(s):

- Implement a serious consequence which involves an aspect of isolating them from their victim(s). This may or may not include fixed-term exclusion, internal exclusion or detentions
- A parent meeting will be arranged which directs parents to ensure parents take action to address and improve the behaviour of their child

1.8 The West London Free School continually strives to ensure pupils, staff and parents are aware of all issues relating to Safeguarding, including bullying, and does this through its PSHE (Great Conversations) curriculum, new-staff induction, new-pupil induction, assemblies, home-visits, the work of the in-school counselling service, display work and other events.

2 Images

2.1 Occasionally the school will take photographs of the children at our school. The school may use these images to support or assess learning activities, or in our school's prospectus or in other printed publications that we produce, as well as on our website or on project display boards at our school that reasonably promote the work of the school.

2.2 The school may also make video or webcam recordings for school-to-school conferences, monitoring or other educational use or promotional use.

2.3 The Designated Safeguarding Lead will ensure that images are stored securely, kept on file for a time-period which is adequate, relevant and not excessive and will ensure all images are permanently deleted once deemed no longer of use.

2.4 Where images are taken use images that are appropriate and are considered to not be open to misuse. If an image of a child is used, the child's name will not be published. If a name is published, no image will be used without specific consent.

2.5 Where images are used for the school website or other online publications, the school recognises that websites are part of the internet and are more easily accessible than paper-based school publications. The school will make sure that only appropriate images are used and that image filenames will avoid using children's names.

2.6 From time to time, the school may be visited by the media who will take photographs or film footage of a visiting dignitary or other high-profile event. Pupils will often appear in these images, which may appear in local or national newspapers, on televised news programmes or online.

2.7 On joining the school, parents and families are given the opportunity to sign a consent form which gives the school permission under the Data Protection Act (1998) to take images of their child/children in the manner and for the purposes outlined above. For further information about how to manage inappropriate images, including sexting see <https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>

2.8 Staff will monitor and review any photographing pupils do during on-school or off-site activities.

2.9 Camera phones are less visible and can be used to bully or take inappropriate images. This is one of the reasons why pupils are not allowed to use mobile phones on the school premises.

2.10 Where pupils are found to have used their phone on the school premises their phone will be immediately confiscated. If it is believed that pupils have used their phone in order to make inappropriate recordings, the confiscated phone will not be returned until senior teachers are confident

such recordings have been removed and deleted. Where relevant, the Anti-bullying procedures outlined above in Section One of this appendix will be implemented. See Staff ICT and Social Media Acceptable Use Agreement for guidance on appropriate use of phones by staff.

2.11 The school uses CCTV in some areas of the school property to ensure the safety and security of pupils, staff, parents and the safety and security of school buildings and equipment.

2.12 CCTV footage is only reviewed by senior teachers and members of the site-staff to review matters of safety and security including, but not limited to: pupils and adults entering and exiting the building, incidents of theft, violence or vandalism and incidents of trespassing.

2.13 Through the PSHE (Great Conversations) curriculum, Personal Development Curriculum and through individual pupil specific interventions, the West London Free School educates pupils about the importance of understanding both the potential positive and negative implications of different types of images of them themselves. Also, to educate pupils about the importance of controlling the availability of images of themselves and other young people.

3 E-Safety

3.1 The West London Free School recognises that internet use is a necessary tool for learning and that pupils use the internet widely outside school and need to learn how to evaluate internet information and to take care of their own safety and security. As a result, the school has a duty to provide pupils with quality internet access as part of their learning experience.

3.2 The purpose of internet use in the school is to raise educational standards, to promote pupil achievement, to support the professional work of staff and to enhance the school's management functions.

3.3 When using the internet at the West London Free School, pupils will be taught what usage is appropriate and what is not, and pupils will be given clear objectives for internet use.

3.4 The extent to which pupils are able to direct their own learning online in school will reflect the age, ability and curriculum requirements. On an individual basis it will also reflect pupils' proven ability to use the internet and associated equipment responsibly.

3.5 The school recognises the value of email communication between staff and pupils and parents. However, staff are only permitted to use their official, school-provided email account for such communications.

3.6 The West London Free School takes its responsibility for preventing pupils from accessing inappropriate content online very seriously and the school's internet service includes filtering appropriate to the age and maturity of pupils. If staff or pupils discover unsuitable sites, the URL will be reported to the Designated Safeguarding Lead who will investigate and take necessary action in collaboration with IT Support Staff.

3.7 In addition to the age-related filtering provided by the school's internet service, a walled garden or "allow list" restricts access to a list of approved sites (such lists inevitably limit pupils' access to a narrow range of content) and dynamic content filtering examines web page content or email for unsuitable words.

3.8 The West London Free School will control access to social media and social networking sites – preventing access to them on electronic equipment provided to pupils by the school and on the school network.

3.9 Regardless of when and where they are using social networks or social media, the West London Free School will teach pupils to ensure their safety online by never giving out personal details online which may identify them or their location to strangers.

3.10 Where school staff have concerns about a pupil's use of social media or the internet, this will either be discussed with their family or the designated senior person for child protection or both.

3.11 As part of new staff induction and through the code of conduct, staff are told that it is necessary to ensure privacy and security settings on their own social networking profiles are in place to prevent contact with pupils and families.

3.12 School staff are also informed as part of new staff induction and through the code of conduct that they must not post material which damages the reputation of the school or which causes concern about their suitability to work with children and young people.

3.13 Cyberbullying is bullying which uses electronic devices and online platforms such as messaging services, chat rooms and websites to commit deliberately hurtful behaviours which can be defined as bullying in reference to the definition provided in the anti-bullying section of this policy and it will be dealt with as such.

4 Whistleblowing

4.1 The Knowledge Schools Trust's Whistleblowing Policy ensures that procedures are in place to enable staff to raise concerns regarding serious wrong-doing without fear of reprisal and to do so with confidence that there will be a fair and impartial investigative procedure through which they will receive appropriate feedback.

4.2 The Knowledge School's Trust's Whistleblowing Policy is applicable to concerns regarding wrong-doing within the school in relation to matters such as fraud, malpractice, mismanagement, breach of health and safety law or any other illegal or unethical act either on the part of management, the Governing Body or by fellow employees.

4.3 All employees and volunteers at the West London Free School will be directed as to where to find the Trust Schools Whistleblowing Policy available here www.knowledgeschoolstrust.org/policies as part of the induction process.

4.4 Similarly, all West London Free School employees and volunteers are issued with the most recent edition of Keeping Children Safe in Education which informs readers that where they are concerned that the Designated Safeguarding Lead is not taking appropriate steps to keep a child or children safe, they should contact social care directly. Also available, is the NSPCC's 'What you can do to report abuse' on 0800 028 0285 (8am – 8pm, Monday to Friday) and email: help@nspcc.org.uk

4.5 General guidance on whistleblowing can be found via: <https://www.gov.uk/whistleblowing>

5 Use of Physical Intervention

5.1 The West London Free School defines Physical Intervention, sometimes referred to as 'restraint' or 'reasonable force', as using the minimum amount of physical force necessary to prevent a pupil from doing, or continuing to do, any of the following:

- Injuring themselves or others
- Committing a criminal offence
- Damaging property
- Disrupting learning in a classroom (where they have refused to leave when told to do so)
- Disrupting a school trip or event (where they have refused to leave when told to do so)

5.2 The West London Free School makes such a definition in accordance with the guidance provided by the Department of Education:

Use of Reasonable Force – guidance for headteachers, staff and governing bodies.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf The West London Free School makes use of the advice given in Reducing the Need for Restraint and Restrictive Intervention (June 2019) here:

5.3 Physical Intervention may also be used to search a pupil without their consent where staff have reasonable grounds for suspecting that pupil to be carrying a weapon. At least two staff members are required to be present at the search. Physical intervention will only be used as a last resort.

5.4 All instances of Physical Intervention must be recorded Via CPOMS. This will then be reviewed by the designated safeguarding lead.

5.5 Before using Physical Intervention, the West London Free School staff will ensure the following:

- The pupil has received repeated verbal instructions to do what is required of them
- The pupil has been told that physical intervention is imminent
- (Where possible), a second adult is present
- A judgement has been made by the staff member(s) that physical intervention would be successful

5.6 During the use of Physical Intervention, the West London Free School staff will ensure the following:

- Only the minimum force is used for the minimum amount of time necessary
- The use of physical intervention will be ended as soon as safety and order has been re-established
- The member(s) of staff present will continue to talk to the pupil: explaining calmly why physical intervention is being used and re-iterating what needs to happen for the use of physical intervention to be ended

5.7 Physical Intervention will never be used as a form of punishment.

5.8 The West London Free School aims to build and maintain a safe and respectful community; any instances of physical intervention being used would be undertaken with extreme caution and evaluated rigorously. All witnesses, including pupils, would be spoken to ensure that they were supported in understanding the role of physical intervention in promoting the safety and wellbeing of all members of the West London Free School community.

5.9 When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities with medical conditions, the school will recognise the additional vulnerability of these groups and consider the risks carefully e.g. by drawing up individual behavior plans and agreeing them with parents, carers, if appropriate.

6 Staff Code of Conduct

6.1 All the West London Free School Staff and volunteers are issued with the Staff Code of Conduct and ICT Acceptable Use Agreement during Induction and familiarize themselves with its contents.

6.2. The Staff Code of Conduct and Acceptable Use Agreement states the aim of creating a secure, safe and inspirational learning environment and details the expectations required of all staff members in order to achieve this stated aim.

7 Reporting Procedures for Staff

7.1 Disclosures may be received from pupils, parents or other members of the public. The School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity.

7.2 The West London Free School staff are aware that concerns about the safety and wellbeing of children are not always solely raised by means of written or verbal disclosure, and as a result, are alert for the signs and symptoms of harm (or potential harm) detailed in section 4.2 of this policy.

7.3 Such information cannot remain confidential and staff will immediately communicate what they have been told to the safeguarding team via CPOMS.

7.4 Following any information raising concern, the Designated Safeguarding Lead will consider:

- Any urgent medical needs of the child
- Any other relevant information previously recorded about the child
- Discussing the matter with other agencies involved with the family
- Consulting with appropriate persons e.g. Safeguarding Officer, Social Care
- The child's wishes
- If the information has been recorded appropriately and stored correctly

Then decide:

- Wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
- Whether to make a child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately

Or decide:

- Not to make a referral at this stage
- If further monitoring is necessary
- To undertake an assessment (e.g. CAF) and/or make a referral for other services
- All information and actions taken, including the reasons for any decisions made, will be fully documented.

8 Managing Allegations Against Staff

This process should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

8.1 If an allegation is made about a member of staff, governor, visitor or volunteer, the Headteacher and the Designated Safeguarding Lead should be informed immediately.

8.2 However, if the allegation involves the Headteacher, then the chair of governors should be notified immediately instead and replace them within the adherence to these procedures.

8.3 The Headteacher should not investigate the allegation themselves. If more information is required than the initial disclosure, they will instruct the Designated Safeguarding Lead to gather such information if this can be done in a manner which is not prejudicial to any of the following:

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Headteacher will notify the Local Authority Designated Officer (LADO) who will advise about action to be taken and may initiate internal referrals within Children's Social Care to address the needs of children likely to have been affected
- If it is not clear whether the actions of the member of staff raise child protection concerns, the Headteacher must immediately seek advice from the LADO
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil(s), this will be addressed in relation to the code of conduct
- If the Headteacher decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child protection file.

8.4 When determining the outcomes of an investigation (an investigation either with or without input from the LADO or other external agencies), the following definitions will be used:

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.

8.5 The West London Free School recognises it has a duty of care to each of its employees and will act to ensure that the inherent stress in the allegations process is minimised by notifying them of the allegation as soon as possible and as soon as appropriate based on guidance from the 'case manager' (Headteacher or chair of governors) and the LADO (where appropriate). The 'case manager' will also appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual involved.

8.6 The 'case manager' should notify the parents of the child/children involved in the allegation as soon as possible and as soon as appropriate based on guidance from the LADO or other external agencies. Parents will also be informed of the progress of the case by a representative of the school and will be informed of the outcome where appropriate. Parents will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002.

8.7 The West London Free School recognises it has a legal obligation to make a referral to the DBS if a member of staff resigns, comes to a settlement agreement with the school to end their employment or leaves the school by any other means, including long-term absence, while the subject of an investigation relating to a Safeguarding allegation.

Allegations against an individual not directly employed by KST

If an allegation is made against an individual not directly employed by KST, for example a supply teacher, trainee teacher from another school or agency worker, then the allegation will be investigated in the same manner as if the individual was employed by KST. The DSL will find out the facts and liaise with the local authority designated officer (LADO) to determine a suitable outcome. The police and/or children's service may be involved. The DSL or Headteacher will advise the agency who employs the individual of the situation and that an investigation is underway. The agency will also be advised if the individual has been suspended. During the period of the investigation and any suspension, the individual will still be paid.

The agency should be kept informed of the investigation and will be expected to co-operate in any enquiries from the school LADO, police and/or children's social services relating to previous concerns or allegations known to the agency. Once the investigation has been concluded then the agency will be informed of the conclusion and the actions that are to be taken.

9 Management of Safeguarding (including Responding to Disclosures and a protocol for interacting with third parties).

9.1 Following a child protection referral, the Designated Safeguarding Lead or other appropriate member of staff will:

- Make regular contact with the social worker involved to stay informed
- Wherever possible, attend Strategy Discussion Meetings

- Provide a report for, attend and contribute to any subsequent CP Conference(s)
- If the child or children are placed on a Child in Need or Child Protection Plan or become subject to the Family Recovery Project, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences
- Where a child on the child protection register moves from the school or goes missing, immediately inform the key worker in Social Care

9.2 The West London Free School recognises that children can be abused by other children and understands that serious behaviour incidents, including instances of bullying, should first be assessed to see if they represent a risk of significant harm and should therefore be managed and recorded in accordance with this Safeguarding policy. Any allegation against a child should be reported to the DSL.

9.3 Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records are kept securely on CPOMS.

9.4 The school's secure filing system for child protection records is CPOMS, a software application for monitoring child protection, Safeguarding, pastoral and welfare issues. Files are clearly labelled CP or CIN with initials of child's forename and surname and are separate from the child's main file.

9.5 the West London Free School is committed to supporting every child in partnership with their parents, including and extending to the professional networks established around families when and if they become subject to Child Protection, Child in Need of Family Recovery Project plans.

9.5.1 The school recognises that the child's welfare is paramount, however good child protection practice and outcome relies on a positive, open and honest working partnership with parents.

9.5.2 Whilst the school may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling its duties to protect any child.

9.5.3 The school will provide a secure, caring, supportive and protective relationships for the child by sharing some, if any information, on a need to know basis with pastoral staff, including the in-school counselling service where appropriate.

9.5.4 Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.

9.5.5 We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The Designated Safeguarding Lead will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child.

APPENDIX A

10 Sexual violence and sexual harassment between children in school

10.1. The school adheres to the guidelines issues by the DfE on Sexual violence and sexual harassment between children available here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf and will follow procedures outlined within.

10.2 The school teaches pupils that sexual violence and sexual harassment is not acceptable, will not be tolerated and is not an inevitable part of growing up

10.3 The school does not dismiss or tolerate challenging and/or criminal behaviour, such as lifting up skirts, grabbing bottoms, breasts or genitalia, or upskirting.

10.4 The school will respond to incidents on a case-by-case basis, supported by children's social care and the police if required. All victims will be taken seriously, supported and kept safe.

10.5 The school will consider the following options when managing any reports of sexual violence and sexual harassment:

1. Manage internally by the school
2. Early help – multi-agency early help
3. Referrals to children's social care
4. Reporting to the police – in parallel to children's social care.

11 Safeguarding response to children who go missing from education

11.1 Staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of Safeguarding responsibilities, which may include abuse, neglect, sexual abuse or exploitation or child criminal exploitation. It may also indicate mental health problems, risk of abuse, the risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. The school knows that in such cases early intervention is necessary and monitors unauthorized absences carefully using these possible approaches:

- contacting parents to establish the cause of repeated unauthorized absence
- contact children' social care
- contacting the local Prevent Team
- contact the Police.

11.2 Further information on the school's duties regarding children missing education, including information the school must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, are found in the DFE statutory guidance 'Children Missing Education' (2016).

12. Safeguarding children who are referred to Alternative Provision Providers

12.1 In line with guidance in KCSiE, if the West London Free School refers a child to Alternative Provision, the school will ensure that written confirmation of DBS checks undertaken by the provider is obtained

13. Private fostering - LA notification when identified

Private fostering occurs when a child under the age of 16 (or under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

The school or college will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. A comprehensive guidance on private fostering can be found at DFE Statutory Guidance Private Fostering

APPENDIX B

Key Safeguarding documents published by the Department for Education

Keeping Children Safe in Education (Sept 2020)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf

Working Together to Safeguard Children (July 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Children.pdf What to do if you are worried a child is being abused (March 2015)

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused-2>

Use of reasonable force: advice for head teachers, staff and governing bodies (July 2013)

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Reducing the Need for Restraint and Restrictive Intervention (June 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812435/reducing-the-need-for-restraint-and-restrictive-intervention.pdf

'Information Sharing: Advice for practitioners', DfE (July 2018)

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

APPENDIX C

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific Safeguarding issues. For example, information can be found on the TES, MindEd and the NSPCC websites. Staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying
- children missing education – and Annex A
- child missing from home or care
- child sexual exploitation (CSE) – and Annex A
- county lines
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – and Annex A
- forced marriage- and Annex A
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- sexting
- trafficking

Responding to Safeguarding issues can be upsetting for staff and any member of staff can speak to the DSL if they need support.

Live links to the guidance are contained in the document: Keeping Children Safe in Education (September 2019) Part one:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf

APPENDIX D

School and trust policies among those to be considered and read in conjunction with this policy are listed below and can be accessed via the following links:

<https://www.wlfs.org/Policies/>

Attendance
Behaviour, Anti-Bullying, Rewards, Appearance and Uniform Policy
Charging & Remissions
Locker Acceptable Use
Looked After Children Policy
Mobile Phone
Pastoral Care
Provider Access Policy
Pupil ICT and Social Media Acceptable Use Policy
Sex & Relationship Education
Special Education Needs & Disability

<https://www.knowledgeschoolstrust.org/Policies/General-Policies/>

Complaints
Data Protection
Debt Recovery
First Aid
Gift and Hospitality Policy
Health & Safety

<https://www.knowledgeschoolstrust.org/Employment-Policies/>

Code of Conduct
Whistleblowing

APPENDIX E

Staff recruitment and pre-employment checks

The school follows statutory guidelines on staff recruitment, interviewing and pre-employment checks as stated in Keeping Children Safe in Education (September 2020) Part Three: Safer Recruitment. Senior Staff and relevant governors receive safer recruitment training and someone with safer recruitment training is present at all staff recruitment interviews. All relevant checks are carried out before a member of staff takes up employment within the school. Statutory checks are also undertaken for governors, including a section 128 check. Safeguarding guidelines are also followed for all visitors to the school, including volunteers and contractors.

The checks undertaken are compliant with the requirements of Keeping Children Safe in Education (September 2020)

APPENDIX F

RESPONSE TO COVID-19 – Potential Full or Partial Closure

This appendix of the West London Free School (WLFS) Safeguarding Policy contains details of our Safeguarding arrangements should there be any further school closure in the following areas:

1. Vulnerable Children
2. Attendance Monitoring
3. Designated Safeguarding Leads
4. Working from Home
5. Online Safety and Wellbeing

1. Vulnerable Children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with Education, Health and Care Plans (EHCP).

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in Section 17 of the Children Act 1989.

Those with an EHCP will be risk-assessed in consultation to decide whether they need to continue to be offered a school place to meet their needs, or whether they can safely have their needs met at home. Many children and young people with EHCPs can safely remain at home.

Senior leaders, especially the Designated Safeguarding Leads, know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

West London Free School will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers for looked-after and previously looked-after children.

2. Attendance Monitoring

Schools do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. The Senior Leadership Team will agree with parents/carers whether children in need should be attending school. West London Free School will then follow up on any pupil that they were

expecting to attend, who does not. Attendance to remote learning will be kept as best as possible, for internal uses only. Staff are reporting any changes in/poor attendance regularly to the Senior Leadership Team and Pastoral Support, as a potential sign of concern.

We are using the Department for Education’s daily online attendance form to keep an accurate record of who is attending on-site at school.

3. Designated Safeguarding Lead/Deputies

As outlined earlier in this document, the Safeguarding Team at West London Free School is as below.

The first point of contact for any Safeguarding concern is the Designated Safeguarding Lead	
Designated Safeguarding Lead	Karla Philomon
Deputy Safeguarding Lead	Ben McLaughlin
Deputy Safeguarding Lead	Jerome Pereira
Deputy Safeguarding Lead – Sixth Form	Georgie Speller
Governor who has leadership responsibility for Safeguarding	Kathryn Cooper
Proprietor Lead for Safeguarding	Jane Emmett
Designated teacher for Looked After Children	Karla Philomon

During the times in which the school is open, a member of the Senior Leadership Team/Safeguarding Team is present and will assume the responsibility for co-ordinating Safeguarding on site. If they are not a DSL or Deputy DSL, the member of staff will be able to contact the relevant person to assist, if need be. There are additional Level 3 Safeguarding trained members of staff who work as part of the Safeguarding Team.

The DSL and the whole pastoral team will continue to engage with Social Workers, and attend all multi-agency meetings, which can be done remotely.

4. Reporting a Concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy, this includes making a report via CPOMS, which can be done remotely. With the use of video/web-based lessons, staff should report any concerning interactions/events that they witness or disclosure, as normal.

In the unlikely event that a member of staff cannot access their CPOMS from home, they should email the Designated Safeguarding Lead (k.philomon@wlfs.org). This will ensure that the concern is received. Staff are reminded of the need to report any concern immediately and without delay.

In addition to the signs outlined earlier the body of this policy, there are some specific signs that all staff are aware to look out for when working remotely. For example:

- a) Not completing assigned work or logging on to school systems;
- b) No contact from children or families or;
- c) Seeming more withdrawn during any class check-ins or video calls.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Designated Safeguarding Lead. All other concerns should be raised as outlined earlier in this document.

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.

5. Working from Home

Members of staff need to be mindful of GDPR when working from home. When accessing information which recognises data of children (e.g. Full Names) or accessing SIMS or CPOMS, make sure there is no

one else visible in your house that can see this information and that any copies/duplication of data is stored securely on West London Free School equipment.

When working remotely, staff must ensure that any and all communication with parents and pupils is professional. With the significant increase in direct communication with pupils, it is imperative that staff are mindful of the language and tone of all correspondence and the hour at which they are sent (normal working hours apply). Communication is strictly limited to be done via the platforms provided by West London Free School.

All aspects of remote learning must use or go through one of the provided platforms (e.g. Microsoft 365, Showmyhomework, Hegarty Maths). The use of any other platforms must be approved by Senior Leadership Team.

When using video-based lessons, staff should re-create the professional classroom setting as far as possible. This includes but is not limited to:

- a) Wearing suitable attire;
- b) Positioning the camera in a way that is suitable;
- c) Remove personal items from view or;
- d) 'Blurring' the background when available;
- e) Keep language professional, being aware of how working from home can impact formality discreetly;
- f) Follow instructions regarding Behaviour and conduct during remote learning to create a safe environment for all other pupils;
- g) Ensuring any feedback is professional.

As above, anything witnessed, overheard or disclosed by pupils which presents a potential Safeguarding concern, must be reported via CPOMS.

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address Misconduct.Teacher@education.gov.uk for the duration of the COVID-19 period, in line with government guidance.

External agencies (Family Support Workers, Speech & Language Therapists, etc.) may be working to support families from home. These agencies will have agreed to this with the Senior Leadership Team, will adhere to the schools' Safeguarding Policy and feedback to the relevant members of staff.

6. Online Safety and Wellbeing

Pupil wellbeing remains at the centre of Safeguarding and duty of care at WLFS, even when working remotely. WLFS recognise that school closures and other consequences of COVID-19 may be adding significant additional strain to families.

WLFS will continue to support all its members in protecting themselves from unnecessary risk or harm when working remotely or accessing online materials, promoting healthy lifestyle choices and mental health. For pupils, this means that information and advice will continue to be shared by the Pastoral Team via approved platforms e.g. video 'assemblies', weekly newsletters etc.

For those pupils identified as at-risk or vulnerable formally or by WLFS staff, a range of steps are in place depending on the level of concerns. These include but are not limited to:

- a) Weekly phone calls with parents/families and records kept
- b) Routine updates via social workers/family support
- c) Direct messaging, where appropriate, via Microsoft Teams
- d) Regular (e.g. weekly) emails to families of concern
- e) Direct school contact detail for our counsellors are being shared as appropriate

For staff, additional advice and guidance has been provided regarding safety and risk when working remotely and staff are to report any concerns (not Safeguarding or GDPR concerns) to their line manager via email. Line managers have been directed to maintain regular contact with staff to monitor wellbeing. Regular surveys of wellbeing and remote working are being conducted to protect staff. Further, additional advice around personal wellbeing is being provided by the Knowledge Schools Trust directly to staff.

The School's existing policies and documents around use of ICT equipment for staff and pupils remain in effect.



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