

Child protection and safeguarding policy and procedures

Independent Day School for Boys and Girls

Fairley House School

Date	Sept 2021
Date for renewal/update/review	Sept 2022
Named person responsible for review	Deputy Head Teacher
POLICY CHANGES	
Sept 21 – amendments to policy	<p>Pg. 4 Added new nominated safeguarding governor name</p> <p>Pg. 5 Changes to the references to updated guidance and advice</p> <p>Pg. 6/7 – early help added mental health need, family member in prison, risk of honour-based abuse, persistently absent</p> <p>Pg. 10 – what to do risk from serious violent crime</p> <p>Pg. 14 – staff response to nude and semi nudes’ images being shared by pupils</p> <p>Pg. 15 – advice how to deal with peer-on-peer allegations</p> <p>Pg. 21 – signs and types of abuse – update nude and semi-nudes.</p>

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Contents

1. Aims	3
2. Legislation and statutory guidance	5
3. Definitions	5
4. Equality statement	6
5. Roles and responsibilities.....	6
6. Confidentiality	9
7. Recognising abuse and taking action	9
8. Notifying parents	17
9. Mobile phones and cameras	17
10. Complaints and concerns about school safeguarding practices	17
11. Record-keeping	18
12. Training	18
13. Monitoring arrangements	19
14. Links with other policies	19
Appendix 1: types of abuse	20
Appendix 2: safer recruitment and DBS checks – policy and procedures	23
Appendix 3: allegations of abuse made against staff	26
Appendix 4: specific safeguarding issues	29

KEY EXTERNAL CONTACT DETAILS¹

Local Authority Designated Officer	<p>The relevant Local Authority will be contacted: numbers for all Authorities can be found at the end of this document.</p>
Local Authority Children's Social Services	<p>The relevant Local Authority will be contacted: numbers for all Authorities can be found at the end of this document.</p>
Multi-Agency Safeguarding Hub	<p>TEL: 0207 641 3991 EMAIL: kduncanl@westminster.gov.uk</p>
Support and Advice about Extremism	<p>Police <i>MET Police</i> TEL: 0500555111 Crimestoppers EMERGENCY: 999 NON EMERGENCY NUMBER: 101 Anti-Terrorist hotline: 0800 789 321 Contact online support: https://www.met.police.uk/contact/af/contact-us/Terrorism/extremism https://www.met.police.uk/tua/tell-us-about/ath/possibleterrorist-activity/</p>
NSPCC Whistleblowing Advice Line	<p>ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk</p>
Disclosure and Barring Service	<p>ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@db.gov.uk</p>

Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT
	TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net

KEY SCHOOL CONTACT DETAILS

Governors	<p>Chair of Governors Tina Tietjen TEL: 0207 976 5456 EMAIL: tina.tietjen@fairleyhouse.org.uk</p> <p>Nominated Safeguarding Governor Jolyon Luke TEL: 0207 976 5456 EMAIL: jolyon.luke@fairleyhouse.org.uk</p>
Designated Safeguarding Lead (DSL) {and Deputy Designed Safeguarding Lead (DDSL)}	<p>Main DSL for the School Michael Taylor TEL: 0207 976 5456 EMAIL: mt@fairleyhouse.org.uk</p> <p>Deputy DSL Alex Benkreira TEL: 0207 976 5456 EMAIL: ajb@fairleyhouse.org.uk</p>
Designated Teacher for Looked After Children	TEL: Michael Taylor EMAIL: mt@fairleyhouse.org.uk

Head

Michael Taylor

TEL: 0207 976 5456

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Aims

The school aims to ensure that:

Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.

Appropriate action is always taken, in the best interests of the child and in a timely manner to safeguard and promote children's welfare

All staff are aware of their statutory responsibilities with respect to safeguarding to ensure that all pupils are safe from abuse, neglect exploitation and harm

Staff are properly trained in recognising and reporting safeguarding issues

The policy applies to Fairley House School and is reviewed and updated annually and is available on the School website and on parental request.

Our school will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning; Through PSHE and other curriculum contexts, pupils are encouraged to talk about feelings and deal assertively with pressures, are listened to, and know to whom they can turn to for help and advice;
- providing pupils with a range of appropriate adults to approach if they are in difficulties; and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'
- supporting the child's development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly; plus Relationship and Sexual Health Education (RSHE) requirements.
- liaising and working together with other support services and those agencies involved in safeguarding children;
- ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they might or can talk to and will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including, sexual harassment, peep-on-peer abuse, 'sexting' and the displaying of 'Harmful Sexualised Behaviour';
- having a behaviour policy and anti-bullying policy that are aimed at supporting pupils in the school. The school will ensure that each pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- Clear procedures are in place for addressing and minimising the risk of peer-on-peer abuse, including sexual violence and sexual harassment - these procedures are easily understood and easily accessible
- acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- liaising with a range of Early Help agencies that support the pupil such as Health Services, Child and Adolescent Mental Health Services, Education Welfare Services

COVID-19 / ROLES AND RESPONSIBILITIES

Keeping Children Safe in Education (KCSIE) will remain in force throughout the response to coronavirus (COVID-19).

The department has issued non-statutory interim guidance on [safeguarding in schools, colleges and other providers during the coronavirus outbreak](#). This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual.

2. Legislation and statutory guidance

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2021)
- Disqualification under the Childcare Act 2006 (September 2018)
- What to do if you're worried a child is being abused, advice for practitioners (March 2015)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice (September 2021) (SVSH)
- Working Together to Safeguard Children (2020)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (April 2021)
- The Prevent Duty: Departmental advice for schools and child care providers (August 2015)
- The use of social media for on-line radicalisation (July 2015)
- Relationships and sex education (RSE) and health education (2019)
- The DDCMS/UKIS guidance "Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)
- The Charity commission guidance Safeguarding and protecting people for charities and trustees (October 2019)

This policy also takes into account the procedures and practice of Tri-borough (Hammersmith and Fulham, Kensington and Chelsea and Westminster) as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children's Partnership for Hammersmith & Fulham, Kensington and Chelsea and Westminster.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

Have special educational needs or disabilities

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

Are asylum seekers

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Tri-borough Multi Agency Safeguarding Hub (MASH). Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

Our systems which support safeguarding, including the staff code of conduct, the role and identity of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education.

- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment. Staff should be particularly alert to the potential need for early help for a child who:

Is disabled and has specific additional needs

Has special educational needs (whether they have a statutory education, health and care plan)

Has a mental health need

Is a young carer
Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime 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 a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
Has returned home to their family from care
Is showing early signs of abuse and/or neglect
Is at risk of being radicalised or exploited
Has a family member in prison, or is affected by parental offending
Is experiencing, or is at risk of experiencing family ostracism
Is at risk of “honour” based abuse such as Female Genital Mutilation or Forced Marriage
Is a privately fostered child.
Is persistently absent from education, including persistent absences for part of the school day

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Tri-borough Multi Agency Safeguarding Hub (MASH) referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

Safeguarding response to children who go missing from education

Contextual Safeguarding, Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Our DSL is the Headmaster, Mr Michael Taylor. The DSL takes lead responsibility for child protection and wider safeguarding. The Headmaster can be contacted by e-mail or by mobile telephone.

When the DSL is absent, the Deputy Head Teacher, Mrs Alex Benkreira, will act as cover.

If the DSL and Deputy Head Teacher are not available, one of the SENCOs will act as cover (for example, illness, during out-of-hours/out-of-term activities).

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated:

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via ebulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

On-line safety

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

- Acting as the main point of contact on all online safety issues
- Ensuring relevant policies are in place to mitigate or handle online safety concerns
- Recording online safety incidents and actions taken
- Ensuring the school community understands what safe and appropriate online behaviour is and the sanctions for misusing the Internet
- Liaising with the leadership team and technical staff to ensure appropriate filtering and monitoring systems are in place on school devices
- Liaising with the data protection officer to ensure online safety policies align with current legislation
- Implementing online safety training for all safeguarding staff
- Actively encourage positive online behaviour
- Ensuring online safety education is embedded throughout the curriculum and empowering children to keep themselves and others safe online
- Promoting online safety to parents and carers
- Refreshing their training at regular intervals, at least annually
- Keeping updated with current research legislation and trends

Child protection file

Where children leave the school or college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns.

5.3 The governing board

The governing board will approve this policy at each review and hold the headteacher to account for its implementation.

The governing board will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

Ensuring that staff (including supply staff) and volunteers are informed of this policy as part of their induction

Communicating this policy to parents when their child joins the school and via the school website

Ensuring that the DSL and the Deputy Designated Safeguarding Lead have appropriate time, funding, training and resources

Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Timely information sharing is essential to effective safeguarding

Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm

Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, supply staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The Headmaster will make prompt contact with Children's Social Care or Channel where there are concerns of immediate serious harm to the child and /or with the LADO in relation to allegations against someone working within the school and /or with the police if a criminal offence is suspected.

The date and time of any concerns raised by phone call will be logged on the Child Protection File. Referral by telephone will be followed up in writing within 48 hours, giving the child's name and date of birth with contact details for the family and outlining the cause of concern.

The school has a wide catchment area with children coming from most London Boroughs and outside London boroughs. In the event of uncertainty over which is the relevant Local Children's Safeguarding contact, or if advice is required on whether referral is appropriate, the Headmaster will contact the Tri-borough Multi Agency Safeguarding Hub (MASH) MASH Business Support Officer Karen Duncan Team: 0207 641 3991.

LSCP 1st Floor Kensington Town Hall Hornton Street London W8 7NX

Email: Jennifer.pearce@rbkc.gov.uk

It does not offer advice regarding individual children, but its website gives contact details for all London Safeguarding Children's Board and Partnerships:

<http://londonscb.gov.uk/>

The website also gives useful information on child protection procedures in London.

The Headmaster will attend Child Protection and Strategy meetings. Staff members may be asked to provide a report on a child for a Child Protection meeting.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

Listen to and believe them. Allow them time to talk freely and do not ask leading questions

Stay calm and do not show that you are shocked or upset

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM must speak to the DSL.

7.4 What staff should do if they have concerns that children at risk from or involved with serious violent crime (see Appendix I)

If staff have any concerns about a child (as opposed to being in immediate danger) they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

7.5 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. **There is no requirement to gain parental consent before making a referral to a statutory agency.** If the decision is made to refer the child without the parents' consent, this will be recorded with a full explanation of your decision.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

7.6 If you have concerns about radicalisation

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action.

Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

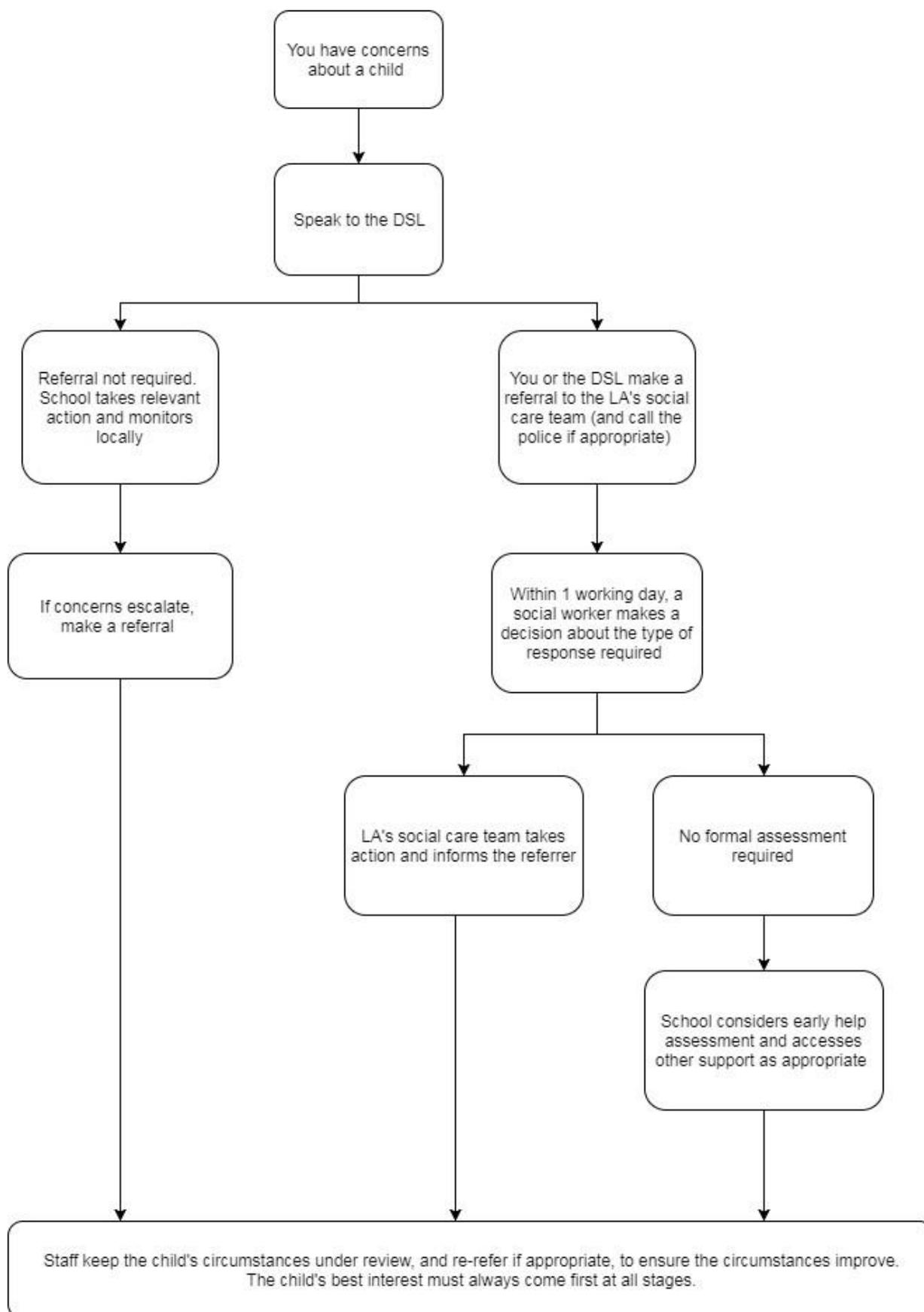
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist

group See or hear something that may be terrorist-related

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the headteacher, (DSL). If you have concerns about the headteacher, speak to the chair of governors.

The headteacher/chair of governors/DSL will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other pupils (Peer on Peer Abuse)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

Is serious, and potentially a criminal offence

Could put pupils in the school at risk

Is violent

Involves pupils being forced to use drugs or alcohol

Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

You must tell the DSL and record the allegation, but do not investigate it

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

Challenging any form of derogatory or sexualised language or behaviour

Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

Ensuring pupils know they can talk to staff confidentially by holding sessions during PSHE sessions that tackles these issues

Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.9 If a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

7.10 If a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

7.11 How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and seminudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).

- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

7.12 Arrangements for dealing with peer-on-peer allegations (including child on child sexual violence and harassment)

Peer on peer abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

These arrangements apply to all reports and concerns of peer-on-peer abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of peer-on-peer abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also

recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to peer-on-peer abuse and can recognise the indicators and signs of peer-on-peer abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the three safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the three safeguarding partners and/or the Police as appropriate. The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia.⁴⁷ Rape, assault by penetration and sexual assaults will be passed to the police.⁴⁸ If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the three safeguarding partners referral process.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or seminudes have been shared.

In the event of disclosures about peer-on-peer abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and support from external agencies will be sought, as appropriate.

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.}

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. Mobile technology

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Pupils' mobile phones and Smart Watches are collected at the start of each school day and locked away safely. They are then returned to the pupils at the end of the day.

10. Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. ICT and online resources are increasingly used across the curriculum. We believe it is essential for e-Safety guidance to be given to the pupils on a regular and meaningful basis. e-Safety is embedded within our curriculum, and we continually look for new opportunities to promote e-Safety.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

The school has a framework for teaching e-safety skills in Computing Lessons. At Lambeth Road we cover one e-Safety lesson each half term as part of the Computing Curriculum.

At Causton Street there is a whole unit in year 7 and year 8 on eSafety. Other year groups at Causton Street have occasional lessons throughout the year. Educating pupils about the online risks that they may encounter outside school is done informally when opportunities arise and as part of the e-Safety curriculum.

Pupils are taught about copyright, respecting other people’s information, safe use of images and other important areas through discussion, modelling and appropriate activities

Pupils are aware of the impact of Cyberbullying and know how to seek help if they are affected by any form of online bullying. Pupils are also aware of where to seek advice or help if they experience problems when using the internet and related technologies, i.e. parent/ carer, teacher/ trusted staff member, or an organisation such as Childline or the ‘CEOP report abuse’ button.

10. Complaints and concerns about school safeguarding practices

10.1 Complaints against staff (including supply staff)

Complaints against staff (including supply staff) that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

10.2 Other complaints

If there is concern about the conduct of any adult working with children at or from FHS, it is vital that the concerns should be reported to the Headmaster or Deputy Head Teacher. In the event of their absence the allegation should be passed to the Chair of Governors. Avoid “whistle-blowing” allows paedophiles to operate. (See Whistle-Blowing policy).

In the event of an allegation of abuse against a member of staff (including supply staff), advice would be taken within 24 hours from outside agencies such as the police, or the Tri-borough LSCB.

If the allegation involved serious harm, the police would be informed immediately. No internal investigation would be conducted to avoid jeopardising a police investigation. Depending on the advice received and the seriousness of the allegation, a likely outcome is that the staff member would be suspended on full pay pending a full and fair investigation of the matter. School will co-operate fully with any investigation. The reason for the suspension will not be made known to children and parents or the general public until the outcome of the investigation is known and then only if the allegations are proven or unless information enters the public domain. (See Media Communication Policy) If colleagues are informed of the reason for suspension, they are asked not to discuss the matter out of school.

If the allegations were against the Headmaster, the Chair of Governors would be informed without the Headmaster being forewarned and, if the allegation involved serious harm, police would be informed immediately. It is likely that the Chair of Governors and Child Protection Governor would work together on managing the situation.

An allegation against a volunteer is unlikely given their extremely limited use at FHS. However, any allegation would be taken seriously, advice sought from the LADO or police and the school would co-operate with any investigation. The person concerned would not be allowed to work at the school again unless any investigation had shown the allegations to be groundless.

10.3 Staff Code of Conduct

Please refer to our staff code of conduct policy.

10.4 Acceptable use of IT

Please refer to our staff acceptable use policy.

10.5 Whistle-blowing

Please refer to our whistle-blowing policy.

11. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding record keeping is paper-based and stored in locked cabinets, which are located in the Headmasters office, and the key is held by the Headmaster and Deputy Head who are designated leads. This information is kept for 50 years, following the child leaving school it is stored in a locked cabinet in our storage facility with access only by the Headmaster.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

12. Training

12.1 All staff

All staff members will undertake safeguarding and child protection training at induction. This includes policy and procedures for dealing with peer or peer abuse, on-line safety and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our three safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

12.2 The DSL and Deputy Head Teacher

The DSL and Deputy Head Teacher will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

12.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

12.4 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

13. Monitoring arrangements

This policy will be reviewed **annually** by the Deputy Head Teacher. At every review, it will be approved by the full governing board.

14. Links with other policies

This policy links to the following policies and procedures:

Behaviour Policy

Code of conduct Policy

Complaints Policy

Health and safety Policy

E-safety Policy

Attendance Policy

RSHE Policy

First aid Policy

Curriculum Policy

Privacy notices

Whistle-blowing Policy

Staff IT acceptable use Policy

Remote Learning Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix I: types of abuse

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

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

Indicators of abuse and neglect

Abuse:

a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

- Physical abuse: a form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Safeguarding issues 26. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

- Peer on peer abuse All staff should be 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 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);
 - initiation/hazing type violence and rituals.

○ Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with 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 should be 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.

○ Sharing of nudes and/or semi nudes

The sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g., by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

- Child abduction and community safety incidents Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org
- Children and the court system Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National

Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

- Modern Slavery and the National Referral Mechanism Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)
- Cybercrime - Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;
 - unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
 - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
 - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, and within in the guidelines of GDPR, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

Verify their identity

Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We do require sight of the original certificate, we record the certificate number and the date of issue, but no longer keep a copy on file. For those that are on the update service we keep a record of the date and time of the online check and where possible download this check for the file.

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available, a risk assessment is also issued for those staff waiting on their DBS check, this is very rare as turn around on DBS checking online (Ucheck) is normally only a few days.

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification (passport or visa) for the duration of the member of staff's employment and for 2 years afterwards this includes UK nationals as advised by the UKBA.

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Ask for written information about previous employment history and check that information is not contradictory or incomplete this takes the form of an application form or initial CV

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)

Where the individual has received a caution or conviction for a relevant offence

If there is reason to believe that the individual has committed a listed relevant offence, under the

[Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)

If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children We will obtain the DBS check for self-employed contractors if they are not on the update service.

We will no longer keep copies of the DBS certificate of such checks. But we will have sight of the original certificate and record the number and issues date.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school if this takes place during term time.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers

Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governors

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees, proprietors and local governors will also have the following checks:

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be always accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff. All staff have had access to "Prevent" training.

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, supply staff, volunteer or contractor may have abused a pupil in their care.

There is an agreed staff behaviour policy (Code of Conduct) which is compliant with (Safer Working Practices', and includes – acceptable use of technology, staff/pupil relationships and communications including the use of social media

This policy applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Supply teachers – we will consider all allegations against an individual not directly employed by, where disciplinary procedures do not fully apply, (for example, supply teachers provided by an employment agency) and ensure allegations are dealt with properly and communication with supply agency and Local Authority Designated Officer (LADO) is continued throughout the investigation.

This part of the policy has two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

Allegations that may meet the harms threshold

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk)

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- 1) Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)**
- 2) Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies**
- 3) Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate**
- 4) If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details**
- 5) If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation**
- 6) If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate**
- 7) Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The individual will be able to contact their trade union representative if they are within a union.**
- 8) Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or**

carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- 9) Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 10) Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

Who needs to know about the allegation and what information can be shared?

How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

What, if any, information can be reasonably given to the wider community to reduce speculation

How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

A clear and comprehensive summary of the allegation

Details of how the allegation was followed up and resolved

Notes of any action taken, and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

Issues arising from the decision to suspend the member of staff

The duration of the suspension

Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Concerns that do not meet the harm threshold

Concerns of this nature may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult 95 within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low level concerns

As part of the whole school approach to safeguarding, the DSL and Deputy DSL ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this will encourage an open and transparent culture to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low level concern?

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the DSL or Deputy DSL, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Sharing low-level concerns.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported in the following way;

- referral to the headteacher;
- where there are concerns/allegations about the headteacher, this should be referred to the chair of governors

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

It is for schools to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

Are at risk of harm or neglect

Come from Gypsy, Roma, or Traveller families

Come from the families of service personnel

Go missing or run away from home or care

Are supervised by the youth justice system

Cease to attend a school

Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

It is school policy to hold more than one emergency contact number for each pupil, where reasonably possible.

Child sexual exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and 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).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and

- children who suffer from sexually transmitted infections or become pregnant.

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners.¹⁷¹

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.¹⁷²

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.¹⁷³

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

Only 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 potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.¹⁷⁴

Special educational needs and/or disabilities: Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

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.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi or trans (LGBT): Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

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

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

A pupil confiding in a professional that FGM has taken place

A mother/family member disclosing that FGM has been carried out

A family/pupil already being known to social services in relation to other safeguarding issues

A girl:
Having difficulty walking, sitting or standing, or looking uncomfortable

Finding it hard to sit still for long periods of time (where this was not a problem previously)

Spending longer than normal in the bathroom or toilet due to difficulties urinating

Having frequent urinary, menstrual or stomach problems

Avoiding physical exercise or missing PE

Being repeatedly absent from school, or absent for a prolonged period

Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

Being reluctant to undergo any medical examinations

Asking for help, but not being explicit about the problem

Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:
Having a mother, older sibling or cousin who has undergone FGM

Having limited level of integration within UK society

Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period

Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

Being unexpectedly absent from school

Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the pupil about the concerns in a secure and private place

Activate the local safeguarding procedures and refer the case to the local authority's designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alerted to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

Refusal to engage with, or becoming abusive to, peers who are different from themselves

Becoming susceptible to conspiracy theories and feelings of persecution

Changes in friendship groups and appearance

Rejecting activities, they used to enjoy

Converting to a new religion

Isolating themselves from family and friends

Talking as if from a scripted speech

An unwillingness or inability to discuss their views

A sudden disrespectful attitude towards others

Increased levels of anger

Increased secretiveness, especially around internet use

Expressions of sympathy for extremist ideologies and groups, or justification of their actions

Accessing extremist material online, including on Facebook or Twitter

Possessing extremist literature

Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL, in order to identify the most appropriate referral to make, which could include a referral to Channel or Children's Social Care.

Staff should **always** take action if they are worried.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the parent immediately and other contact number we hold. In the unlikely event of not being able to get hold of anybody, a member of staff will wait for the return call. If we are unable to gain a response within an acceptable timeframe we shall contact the LADO, for further advice.

Missing pupils (within school)

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parents/carers and the police. **(Please refer to Missing Pupil Policy)**

Children's Safeguarding Contacts London

If you have concerns about the safety or the well-being of a child, please contact your local authority children's social care team. Contact details are available below:

Barking & Dagenham

Telephone: 020 8227 3811

Out of hours: 020 8594 8356

Secure Email: childrensservices2@lbbd.gov.uk

Barnet

Telephone: 020 8359 4066

Fax: 08715948766

Email: MASH@Barnet.gov.uk

Secure Email: mash@barnet.gcsx.gov.uk

Bexley

Telephone: (Mon-Fri, 9am – 5pm) 020 3045 5440

Out of hours (including weekends): 020 8303 7777 or 020 8303 7171 **Secure**

Email: Childrensocialcare.admin@bexley.gov.uk

Brent

Telephone: 020 8937 4300

Out of hours: 020 8863 5250

Fax: 020 8397 1986

Secure Email: Family.FrontDoor@brent.gov.uk

Web link: <https://www.brent.gov.uk/services-for-residents/children-and-family-support/child-protection-andcare/child-protection/contact-our-protection-team/>

Bromley

Telephone Children's Services (Mon-Fri 8.30 5.00pm): 020 8461 7373 / 7379 / 7026

Out of hours/weekends/public holidays: 0300 303 8671 **Email**

(MASH): mash@bromley.gov.uk

City of London

Telephone Children's Services : 020 7332 3621 (9.00am- 5.00pm, Mon – Fri)

Email: children.duty@cityoflondon.gov.uk

Secure email: Children.Duty@cityoflondon.cjism.net

Out of hours: 020 8356 2710

Email: emergency.duty@hackney.gov.uk

Camden

Telephone: 020 7974 3317 (9.00am- 5.00pm)

Out of hours: 020 7974 4444

Email: LBCMASHadmin@camden.gov.uk

Secure email: LBCMASHadmin@camden.gov.uk.cjism.net

Croydon

Croydon MASH Team

Tel: 020 8726 6400

Email: childreferrals@croydon.gov.uk

Ealing

Telephone: 020 8825 8000

Out of hours: 020 8825 8000

Fax: 020 8825 5454

Email: ECIRS@ealing.gov.uk

Secure Email: Via Egress – please telephone if unable to access Egress directly.

Enfield

Telephone: 020 8379 5555

Out of hours: 020 8379 1000

Email: spoe@enfield.gov.uk

Secure Email: spoe@enfield.gcsx.gov.uk

Greenwich

Telephone referrals: 020 8921 3172 (Mon-Thur, 9.00-5.30pm, Fri 9.00-4.30pm)

Out of hours: 020 8854 8888

Fax: 020 8921 3180

Secure Email: MASH-referrals@royalgreenwich.gov.uk

Hackney

Hackney First Access Screening Team (FAST)

Email: fast@hackney.gov.uk

Secure Email: fast@hackney.gov.uk or fast.account@hackney.cjism.net

Tel: 020 8356 5500

Tel: 020 8 356 2710 (Out of Hours) **Fax:**

020 8356 5516 / 17

Hammersmith and Fulham

Telephone: 020 8753 6600

Out of hours: 020 8748 8588

Fax: 020 8753 4209

Email: familyservices@lbhf.gov.uk

Haringey

MASH Telephone: 020 8489 4470

MASH email: MASHReferral@haringey.gov.uk

Out of hours: 020 8489 0000

LSCB Telephone: 020 8489 3145 / 5837 **LSCB**

Email: lscb@haringey.gov.uk

Harrow

Telephone: 020 8901 2690

Out of hours: 020 8424 0999

Fax: 020 8861 1816

Secure Email: duty&assess@harrow.gov.uk.cjsm.net

Havering

Telephone: 01708 433 222

Out of hours: 01708 433 999

Fax: 01708 433 375

Email: tmash@haverling.gov.uk

Secure email: tmash@haverling.gcsx.gov.uk

Hillingdon

Telephone: 01895 556633

Out of hours: 01895 556633

Email: lbhmash@hillingdon.gov.uk

Hounslow

MASH Office number: 0208 583 4303

Safeguarding Referral line: 0208 583 6600 (option 2 and then 3)

Children's referral email: childrensocialcare@hounslow.gov.uk **MASH**
email: MASH@hounslow.gov.uk

Islington

Telephone: 020 7527 7400

Out of hours: 020 7226 0992

Email: CSCreferrals@islington.gov.uk

Secure Email: CSCT@islington.gcsx.gov.uk

Kensington and Chelsea

Telephone: 020 7361 3013

Out of hours: 020 7373 3227

Fax: 020 7368 0228

Email: socialservices@rbkc.gov.uk

Kingston Upon-Thames

Contact our children's Single Point of Access (SPA) Team (Open 8.00-6.00 pm, Mon-Fri)

Telephone: 020 8547 5008

Secure Email: spa@kingston.gov.uk.cjism.net

Out of Hours Duty Social Worker:

If you need to speak to someone urgently outside of hours, please ring the Duty Social Worker on:-

Telephone: 020 8770 5000

Lambeth

Telephone: 020 7926 5555 (24 hours)

Email: helpandprotection@lambeth.gov.uk

Secure Email: helpprotection@lambeth.cjism.net

Lewisham

Telephone: 020 8314 6660

Out of hours: 020 8314 6000

Secure Email: mashagency@lewisham.gov.uk

Merton

Telephone: 020 8545 4866/3736

Out of hours: 020 8770 5000

Fax: 020 8545 4198

Email: mertonLSCB@merton.gov.uk

Merton MASH: 020 85454227 (Out of Hours: 020 8770 5000) **Secure**

Email: MertonLSCB@merton.gov.uk.cjism.net

Newham

Telephone: 020 8430 2000

Triage Golden Number: 020 3 373 4600

Fax: 020 8430 1003

EDT: 020 8430 2000

Secure Email: ChildrensTriage@newham.gcsx.gov.uk

Redbridge

Telephone: 020 8708 3885

Out of hours: 020 8708 5897 (after 5.00pm and weekends) **Email:**
cpat.referrals@redbridge.gov.uk

Richmond

Contact our children's Single Point of Access (SPA) Team (8.00-6.00pm, Mon-Fri)
Telephone: 020 8547 5008
Out of hours: 020 8770 5000
Secure Email: spa@richmond.gcsx.gov.uk

Southwark

Telephone: 020 7525 1921
Out of hours: 020 7525 5000
Fax: 020 7525 7992
Secure Email: MASH@southwark.gov.uk

Sutton

Telephone: 020 8770 6001
Out of hours: 020 8770 5000
Email: mash@sutton.gov.uk
Secure Email: mash@sutton.gov.uk.cjsm.net

Tower Hamlets

Telephone: 020 7364 5606 / 5601
Out of hours: 020 7364 4079
Fax: 020 7364 2656 / 2655
Secure Email: [MASH @towerhamlets.gcsx.gov.uk](mailto:MASH@towerhamlets.gcsx.gov.uk)

Waltham Forest

Telephone: 020 8496 2310
Out of hours: 020 8496 3000
Fax: 020 8496 2313
Secure Email: [MASH requests@walthamforest.gov.uk](mailto:MASH_requests@walthamforest.gov.uk)

Wandsworth

Telephone: 020 8871 6622
Out of ours (after 5pm): 020 8871 6000
Email: IPOC@wandsworth.gov.uk
Secure Email: ipoc@wandsworth.cjsm.net

Westminster**Telephone:** 020 7641 4000**Out of hours:** 020 7641 6000**Fax:** 020 7641 7526**Email:** accesstochildre/sservices@westminster.gov.uk