

**The White House Preparatory School
Woodentops Kindergarten and Woodentops Day Nursery**

PREP SCHOOL and EYFS

SAFEGUARDING and CHILD PROTECTION POLICY

The Prep School, Kindergarten and Day Nursery share the same site and therefore staff from all settings inevitably encounter, observe, see and hear children and staff from the all settings therefore this policy embraces all children and staff in all settings. Given the proximity of Early Years children, where appropriate, the standards and expectations relevant to Early Years settings are applied to all staff.

Our aims and responsibilities

The welfare, health (including mental health) and safety of our pupils is our first priority and we aim to ensure this is always the case by creating and maintaining an open, safe, caring and supportive atmosphere. This includes:

- Proactively teaching pupils about safeguarding
- Ensuring that systems and procedures are in place to protect pupils
- Acting in the best interests of the child

Safeguarding is everyone's responsibility (visitors included) therefore everyone as the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish
- Know what to do if a child tells you that he or she is being abused or neglected
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school
- Manage the requirement to maintain an appropriate level of confidentiality
- Identify children who may benefit from Early Help
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL
- Be aware of our local Early Help process and our role in it
- Be aware of the process for making a referral to Children's Social Care (especially Lambeth Children's Social Care) and understand the role you might be expected to play in statutory assessments

Definition of safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Who is Responsible?

Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Key People and Contacts

In an emergency or if a child is or you suspect a child is at immediate risk of harm call the Police on 999.

White House Prep School contacts including EYS	
Designated Safeguarding Lead (DSL)	Tony Lewis, Headmaster tony.lewis@whitehouseschool.com Tel: 020 8674 9514 Out of Hours: 07500668911 and/or by email above
Deputy Designated Safeguarding Lead (Deputy DSL)	Grace McCahery, Admissions & Marketing grace.mccahery@whitehouseschool.com Tel: 020 8674 9514
Deputy DSL and Designated Practitioner with responsibility for safeguarding in Early Years	Olivia Palmer, EYS Lead olivia.palmer@whitehouseschool.com Tel: 020 8674 9514

Woodentops Day Nursery contacts	
Designated Safeguarding Lead (DSL)	Ellie Caine, Nursery Manager ellie.caine@woodentopsnurseries.com Tel: 020 8674 9514
Deputy Designated Safeguarding Lead (Deputy DSL)	Catarina Da Silva , Deputy Manager Catarina.Dasilva@woodentopsnurseries.com Tel: 020 8674 9514
Second Deputy DSL	Chelsey Caine, Room Leader Chelsey.Caine@woodentopsnurseries.com Tel: 020 8674 9514
Third Deputy DSL	Claire Lynott, Room Leader claire.lynott@woodentopsnurseries.com Tel: 020 8674 9514

Proprietor contacts	
School:	Mrs Mary McCahery, Proprietor and Principal mary@whitehouseschool.com Tel: 020 8674 9514
Day Nursery:	Mrs Laura Randall, Proprietor and Principal laura.mccahery@whitehouseschool.com Tel: 020 8674 9514

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our Local Safeguarding Children Partnership (LSCP)	Lambeth Tel: 020 7926 4881 lambethscb@lambeth.gov.uk
Local authority children's social care referral team(s) including Prevent	Telephone (24 hour contact number): 020 7926 5555 Email: helpandprotection@lambeth.gov.uk help.protection@lambeth.cjism.net
The Designated Officer for child protection (LADO)	Andrew Zachariades Tel: 020 7926 4679 or 07720 828 700 Email: LADO@lambeth.gov.uk
Referral by a professional (e.g. DSL, Teacher) to the Integrated Referral Hub	Telephone: 020 7926 3100 Or/and complete the MARF (Multi Agency Referral Form): https://www.lambeth.gov.uk/sites/default/files/cyp-lambeth-mar-form.docx

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Police	
Local Police Emergency	999
Local Police non-emergency	101 or 020 7326 1212

National Contacts	
OFSTED Safeguarding Children	08456 404046 whistleblowing@ofsted.gov.uk
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858
NSPCC Child Line	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com
National Helpline for children and young people involved with Children’s Services	Freephone helpline: 0808 800 5792 Email: help@coramvoice.org.uk Text and WhatsApp: 07758 670369 Online: www.coramvoice.org.uk/alwaysheard

What to do if you think you have encountered a Safeguarding issue

Report/discuss the issue in person to the DSL (or if the DSL is unavailable, other person who is trained to L3 in Safeguarding e.g. DDSL) **before you leave site** (or if you are off site e.g. on a residential trip, as soon as you are able by telephone, email or in person and within 24 hours).

You will be asked to **record the issue in writing or by email** before you leave site (or with in 24 hours if on a residential trip) and this will be logged by the DSL.

The DSL will lead you through the process of recording and review what might happen next. The DSL will keep reporting staff involved as far as is reasonable and especially to provide reassurance, recognising our duty of care to those who might encounter safeguarding issues.

When considering possible action the DSL will consider the context in which the issue arose, the child and their family as well as broader circumstances which may help inform what should happen next.

Possible outcomes include:

- a) No action required

- b) Monitoring by agreed colleagues
- c) Involvement of others – possibly family
- d) Referral to outside agency e.g. Lambeth Children’s Services (this includes “Early Help”)

If the DSL/DDSL is ever in doubt they will seek further advice.

Why “same day” reporting?

1. The child is our first priority and if they are at risk of harm we must respond immediately.
2. You are also our priority as all matters related to safeguarding have the potential to be extremely upsetting and our aim is to support you.

What to do if a child discloses a safeguarding issue about themselves or someone else

If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Questioning of the child about what they are saying should not be extensive as partner agencies will lead any investigation. Limit questioning to the minimum necessary for clarification using *What, When, How and Where* but avoid leading questions such as, "Has this happened to your siblings?" Do *not* use questions beginning with *Why* as this can apportion feelings of guilt within a child.
- If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before
- At an appropriate time tell the child that the matter will be referred in confidence
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

Confidentiality: Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

Recording: Staff should make a written record of the conversation with the child as soon as possible. Staff should use the specific words that the child used (e.g. if referring to parts of their body), indicating these by using “speech marks/inverted commas”. **If a disclosure of abuse has been made by the child, immediately discuss the concerns verbally with the DSL or Deputy DSL or another L3 staff prior to writing up the record.** If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL or, failing that, a member of the SLT. All documents should be kept in a secure location with restricted access.

Making referrals to statutory agencies

If a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), then a referral should be made **immediately** to Children’s Social Care or the police if a criminal act is thought to have occurred. **Whilst it is the role of the DSL, any member of staff can make a referral to Children’s Social Care or the police.** *The school does not require parental consent for referrals to be made to statutory agencies.* Consent to do this must **not** be obtained from the parents if to gain consent would put the child’s safety at risk or to do so could jeopardise any investigation by partner agencies.

Contextual Safeguarding and Assessing Risk to children

We recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school and/or can occur between children outside the school. Therefore the DSL and safeguarding team consider the context within which these incidents and/or behaviour occur recognising the wider environment factors which may pose a threat to a child's safety and/or welfare.

Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (October 2019) and Working Together to Safeguard Children (July 2018). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners (LCSP).

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

Additionally:

- What to do if you are worried a child is being abused (2015)
- Information Sharing Advice for Safeguarding Practitioners & Managers (July 2018)
- London Child Protection Procedures (Sept 2019)

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage (Section 3).

Equality

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 (SEN) 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
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

Safeguarding and related policies

This policy is updated annually, drawing on feedback from staff, and is published to all staff and volunteers and placed on the school website. This policy is based on KCSIE 2019 and any references to national guidance made within this document are in relation to the versions listed above. The school will always refer to the above statutory guidance as the benchmark for all safeguarding practice and decision making.

This policy links to other policies and procedures and these include:

- Safer Recruitment Policy
- Employee Handbook
- Staff Code of Conduct and Behaviour Policy
- Staff Annual Declaration
- First Aid
- Administration of Medicines
- Whistleblowing
- Curriculum
- Promoting British Values and Prevent Duty
- SCMS including British Values
- Behaviour Policy (pupils)
- Sex and relationship education
- Anti-bullying
- Educational Visits
- Attendance
- Missing child and non-collection of a child
- Complaints
- Health and Safety
- Equality Opportunities
- Internet and eSafety
- Data Protection
- Record Retention
- Access and Storage of Information
- Taking, storing and using images of pupils
- Privacy notices

To whom does this policy apply?

- This policy and procedure applies to all pupils in the school, including those in the early years, also the Day Nursery.
- This policy and procedure applies to all teaching, non-teaching, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers and any other adults working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated.
- It applies to adults in the early years phase of the school. Throughout the document, the term DSL is used for the Designated Safeguarding Lead. For staff in the early years, they should report directly to the Designated Safeguarding Lead with responsibility for EYS in the School or/and Day Nursery.
- This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the school, including when being educated off-site and undertaking an educational visit.

Definitions and terminology

‘Children’ includes everyone under the age of 18

‘DSL’ refers to the school’s named Designated Safeguarding Lead

‘LSCP’ refers to the Local Safeguarding Children Partnership (i.e. Lambeth)

‘LADO’ refers to the person appointed by the local authority to deal with allegations against adults

‘KCSIE’ refers to the statutory guidance Keeping Children Safe in Education (October 2019)

Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and proprietors in the School and Day Nursery and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

All staff

All staff will read and understand part 1 and Annex A of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education (October 2019), and review this guidance at least annually.

All staff will be aware of:

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation
- 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
- Our systems which support safeguarding, including this safeguarding and child protection policy, the staff behaviour policy, the role and identity of the Designated Safeguarding Lead (DSL), deputies and those responsible for EYs, the pupil 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
- 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

The Designate Safeguarding Lead (DSL)

The DSL for the School is the Headteacher, Tony Lewis, and for the Day Nursery is Ellie Caine. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns and out of hours as listed above.

When the DSL is absent, the deputies will act as cover i.e. Grace McCahery and Olivia Palmer for the School. For the Day Nursery Catarina Da Silva, Chelsey Caine and Claire Lynott.

Out of hours cover is provided by Tony Lewis, Grace McCahery and Mary McCahery either of whom can be contacted on the details provided above.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring there is appropriate time, funding, training and resources, and that there is always adequate cover if the Headteacher/DSL is absent
- 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
- Ensuring the relevant staffing ratios are met, where applicable

The DSL will also keep the Proprietor informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and Deputies are set out in their job description.

Governance oversight and responsibility for Safeguarding

- The Governance Board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation. The Proprietor/Principal will monitor the effectiveness of this policy in conjunction with the Vice Principals.
- The Proprietor will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.
- The Proprietor/Principal and Vice Principals will read Keeping Children Safe in Education especially with reference to Section 13 which has information on how governors are supported to fulfil their role.

Safer recruitment

The School and Day Nursery prioritise embedding a culture of safer recruitment as part of our strategy for preventing harm to children. Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed (see Safer Recruitment Policy)

Policy review

This policy is reviewed annually. This will include an evaluation of the extent to which these policies have been effectively implemented throughout the school. The school will remedy any deficiencies or weaknesses in child protection arrangements without delay and without waiting for the next policy review date, should any be necessary. Staff will be invited to contribute to and shape safeguarding arrangements based on reflection and learning. Staff will be invited to contribute to the review of this policy.

Types of abuse and Potential Indicators

The term 'abuse' is often used as an umbrella term. 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. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse

Abuse is 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. They may be abused by an adult or adults or by another child or children.

Physical abuse

Physical abuse is 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.

Signs of physical abuse can include:

- *injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;*
- *respiratory problems from drowning, suffocation or poisoning;*
- *untreated or inadequately treated injuries;*
- *bruising which looks like hand or finger marks or caused by an implement;*
- *cigarette burns, human bites; or*
- *scarring, scalds and burns.*

Emotional abuse

Emotional abuse is 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.

Signs of emotional abuse tend to be behavioural rather than physical (see below).

Sexual abuse

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

Signs of sexual abuse displayed by children may include:

- *Pregnancy*
- *sexually transmitted infection/diseases;*
- *pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;*
- *urinary infections;*
- *difficulty walking or sitting or standing;*

- *persistent sore throats; or*
- *stomach ache.*

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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.

Signs of possible neglect include:

- *the child seems underweight or is very small for their age, or their weight deteriorates;*
- *the child seems very overweight for their age;*
- *they are poorly clothed, with inadequate protection from the weather;*
- *they are often absent from school for no apparent reason; or persistently arrive late: or*
- *they are regularly left alone, or in charge of younger brothers or sisters.*

Peer on Peer abuse

All staff must be alert to possible indicators of safeguarding concerns which may indicate 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 and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

See further reference and details below.

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and/or disabilities are statistically more vulnerable to child abuse, including peer on peer abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these challenges.

Signs of abuse or neglect manifested by the parents or other responsible adult

- unrealistic expectations of the child i.e. demand a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to or overtly rejects the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the [NSPCC website](#) for further information about grooming,

Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child
- Affording special attention or preferential treatment to a child
- Excessive time spent alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child

Strategies for grooming manifested by sex offenders

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
- Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Poverty
- Social exclusion e.g. refusal to engage with or becoming abusive to peers who are different from themselves, also from family and friends, rejecting activities they used to enjoy.
- Traumatic events
- Response to global or national events e.g. becoming susceptible to conspiracy theories and feelings of persecution
- Religious conversion
- Change in behaviour e.g. increasing levels of anger, increasingly secretive especially around the internet, unwillingness or inability to discuss their views, talking as if from a scripted speech
- Extremist influences e.g. expressions of sympathy for extremist ideologies and groups, possessing extremist literature, accessing similar on line
- Conflict with family over lifestyle
- Confused identity including changes in appearance, showing disrespectful attitude towards other
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups

Children who are at risk of radicalisation may have low self-esteem or might 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.

Child criminal exploitation - County Lines

A geographically widespread form of harm that is a typical feature of county lines criminal activity is the criminal exploitation of children and young people. This is usually through engaging them into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Staff should be aware of the signs of criminal exploitation such as children missing education. More information can be found in KCSIE (October 2019).

Responding to safeguarding situations

The school can use a range of arrangements depending on the information available. The school will always work cooperatively with external agencies, including the local authority and the police. This section should be read alongside the above guidance: **What to do if you think you have encountered a Safeguarding issue**

Inter-agency working

The school is committed to inter-agency working in order to secure the best levels of safeguarding for all of its pupils. The school contributes to inter-agency working in accordance with statutory guidance. The school works with social care, the police, health services and other services to promote the welfare of children and protect them from harm. The school will also work within the requirements of the Lambeth Safeguarding Children Board.

Early Help

If early help is appropriate, the DSL or DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school 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 or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into 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;
- is a privately fostered child.

Children in Need

A Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child who is deemed to be a Child in Need will have been assessed by Children's Social Care under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency.

Making referrals to statutory agencies

If a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), then a referral should be made **immediately** to Children's Social Care or the police if a criminal act is thought to have occurred. **Whilst it is the role of the DSL, any member of staff can make a referral to Children's Social Care or the police.** *The school does not require parental consent for referrals to be made to statutory agencies.* Consent to do this must **not** be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies.

If a child has unmet needs

When a child is not considered at risk of harm, but still has unmet needs that could mean that they are a Child in Need (see above), a referral should be made to Children's Social Care via the local authority process. The school does not require parental consent for referrals to be made to statutory agencies in these circumstances, however, it is best practice that these concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge.

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.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see above Key People and Contacts).

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, which school staff 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

Online safety

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use.

All staff should be familiar with the school's policies relating to Internet and eSafety as well as Data Protection (see above for more complete list), which sets out the school's approach to online safety in further detail.

Sexting

Our approach is on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children’s social care if:

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children’s social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children’s social care, the DSL will conduct a further review. They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children’s social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the contacts identified above.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out previously in this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils do not have mobile phones in school unless they walk to and from school by themselves (with parent and school permission) and mobiles are left in the school office during the day. However we recognise children may have greater access outside of school and are aware of how this situation will change as they make the transition to senior school. Therefore as part of our SRE programme, ICT education and preparation for Transition issues such as sexting and related cyber issues are explored with the children in Year 6. Children should know:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

Private fostering

What is private fostering?

Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility. Close relatives *only* include parents, step-parents, aunts, uncles and grandparents. It is not private fostering if the child is 'looked after' by the Local Authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer). Private fostering occurs in *all* cultures, including British culture, and children may be privately fostered at any age.

Examples of private fostering situations include:

- children and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work or there has been conflict, separation or divorce
- children whose parents work or study elsewhere in the UK or overseas
- children sent to this country by their parents for education and health care
- young people living with the family of a boyfriend or girlfriend
- children on holiday exchanges

People become private foster carers for all sorts of reasons. Private foster carers can be a family friend, or someone who is willing to care for the child of a family they do not know, for example host families supplied by a Guardianship Organisation. If a host family is going to be caring for a child for 28 days or longer, they are classed as private foster carers and the Local Authority must be notified.

Why does the Local Authority Children's Services need to know?

By law, the Local Authority must be informed about all private fostering situations. The child's parents, private foster carers and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, schools or health professionals are *legally required* to inform Children's Services. Children's Services have a legal duty to make sure all private fostering arrangements are safe for the child. Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the child and ensure advice, help and support is available when needed. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement s/he should raise this with the DSL. Where Children's Social Care are not already aware of the circumstances, the DSL should make a referral to them.

Timescales for informing the Local Authority

The child is not yet living with the private foster carers	Within 6 weeks beforehand
The child will move in with the private foster carers within 6 weeks	Immediately
The child is already living with the private foster carers.	Immediately

Looked After Children

A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked After Child'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential children's homes, or other residential settings like schools or secure units.

A child who is adopted is **not** a Looked After Child. Occasionally, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child. Once a Full Care Order is agreed, the child remains on long term foster care. The adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child.

An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their child, most commonly three times per year.

A child may also have been placed in care voluntarily by their parents who are struggling to manage their children's behaviour, or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child.

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

The DSL

- (a) is responsible for ensuring that any looked after children are adequately supported by staff in school;
- (b) has contact details of the child's social worker and the name and contact details of the Virtual School Head for children in care;
- (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements;
- (d) works with the Virtual School Head to discuss how staff can best support the progress of Looked After Children in the school and meet the needs in the child's Personal Education Plan; and
- (e) attends Looked After Children reviews and other meetings they are required to attend.

Peer on Peer abuse

All staff should be alert to the risk of peer on peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh' and should not develop high thresholds before taking action. Abuse is abuse and peer on peer abuse should be taken as seriously as abuse by adults.

What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to, serious bullying (including

cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour (see below) and gender-based violence.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to in accordance with this policy.

What role does gender play?

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the school's Anti-Bullying Policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include:

- a) where it is repeated over time and/or where the perpetrator intended to cause serious harm:
- b) where there is an element of coercion or pre planning and
- c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of peer on peer abuse?

Identifying peer on peer abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from peer on peer abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:

- a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect.
- b) physical injuries.
- c) having difficulties with mental health and/or emotional wellbeing.
- d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
- e) drugs and/or alcohol use.
- f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- a) peer on peer abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.

- c) children with SEN/D are particularly vulnerable to both abuse and peer on peer abuse.

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is in immediate danger, or at risk of harm, a referral to Children's Social Care and/or the police should be made immediately.

How will the DSL respond to concerns of peer on peer abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of peer on peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the school raise awareness of, and reduce the risk, of peer on peer abuse?

Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it. The school actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of bullying in all its forms which embraces peer on peer abuse. The main vehicle for this is in the SRE delivery in Year 6 but it features with in the PSHE programme and in other contexts such as PANTS. The school also engages with the NSPCC promotion of “Speak out, Stay safe”. As with all aspects of such behaviour children are taught that to do nothing is inappropriate and they should respond in some way should they witness or are victims of such abuse, that they should report any such act whether actual or suspected to the appropriate person whether is be one the school’s safeguarding team or other adult to whom they feel they can go e.g. class teacher, parent. They are regularly informed about the school's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse.

Sexual Violence and Sexual Harassment between Children

Peer on peer abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school’s wider approach to peer-on-peer abuse (see above).

Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003.

Sexual Harassment refers to ‘unwanted conduct of a sexual nature’. This can occur *online* (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and *offline* (including but not limited to making sexual comments, sexual taunting or ‘jokes’, and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
- include behaviours that exist on an often progressive continuum and may overlap
- be online and offline (physical or verbal)

Upskirting is a form of sexual harassment and typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. It is a criminal offence

Children with Special Educational Needs (SEN) are more vulnerable, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may be more vulnerable.

Advice from the Department for Education on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2017) provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred. The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. The school will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children.

Key Points: The above guidance

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum
- encourages forums that enable children to talk about issues openly
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;

- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them;
- provides guidance on difficult scenarios which schools might encounter, for example:
 - how to handle an incident between two pupils which is alleged to have taken place away from school premises

Children Missing from Education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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
- Are at risk of forced marriage or FGM
- 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 when a child leaves the school regardless of whether their new school has been identified, 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 suffering or likely to suffer from harm, or in immediate danger.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. If the DSL becomes aware of this situation they will contact the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures

Female Genital Mutilation (FGM)

Whilst all staff should speak to the DSL (or deputy DSL) with regard to any concerns about FGM, there is a specific legal duty on teachers to report FGM. 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 using the telephone number 101. See Annex A of Keeping Children Safe in Education (2019) for further details.

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 into 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 fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Signposting to further information

Annex A of Keeping Children Safe in Education contains further guidance on a range of specific safeguarding issues. This section should be read by all staff that work directly with children.

Any person that has a concern about a child within the school must follow the procedures outlined within this documents.

If staff have any concerns about a child's welfare, they should act on them immediately. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and if appropriate the police) is made immediately.

Annex A of KCSIE contains guidance on the following issues:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation

- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation
- Peer on peer abuse
- Sexual violence and sexual harassment between children in schools and colleges

Record Keeping and Passing on safeguarding records when a child leaves the school

All records are held 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.

The DSL will most normally instruct you to record all details in an email which will be stored electronically. Should any report result in a referral all relevant electronic records will be printed and held in hard copy in a file specific to the child and will be held securely in the Head's office.

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.

Information sharing is vital in identifying and tackling all forms of abuse. When a child leaves the school, it is the responsibility of the DSL to ensure that a copy of their safeguarding records are transferred securely and confidentially to the new school. Before transferring, the DSL will arrange a telephone call with the DSL or Headteacher in the receiving school.

Following the conversation, they will arrange for the secure transfer of documentation. Confirmation of the receipt of the documentation should be retained with safeguarding records. A safeguarding record must be transferred separately from the main pupil file. A copy will be retained for future record.

Whilst data protection legislation places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. **Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.**

The DSL should also consider if it would be appropriate to share any information with the new school 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.

Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, they should report this to the Headteacher/DSL.

If the concern relates to the Headteacher, they should report this to the Proprietor/Principal which they can do without informing the Headteacher.

Concerns raised under this Whistleblowing Policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and follow the whistleblowing procedures.

Where an adult feels unable to raise a concern about poor safeguarding practice within Cognita or where they feel that their concern is not being addressed, they can raise their concern externally using either of the routes below:

- Guidance can be found at - <https://www.gov.uk/whistleblowing>
- The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – lines are available from 8:00am to 8:00pm, Monday to Friday, or email: help@nspcc.org.uk

Responsibilities of the Proprietor

The Proprietor/Principal of the school will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:

- Ensure that all staff read a least Part One of Keeping Children Safe in Education
- Staff working with children will also read KCSIE Annex A
- Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy and Procedure
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of Keeping Children Safe in Education
- Ensure that all safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency procedures set up by the LCSB
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguarding and promote children's welfare
- Ensure that each school works in line with local inter-agency procedures
- Ensure that the Safeguarding Policy is updated annually and made available via the school website
- Provide a Staff Code of Conduct and Behaviour Policy also an Internet and eSafety Policy and other related policies which guide staff in their use of all aspects of ICT, imagery, personal data etc.
- Ensure that all responsibilities regarding Children Missing from Education are followed
- Instruct schools to hold more than one contact number for each child, where possible
- Ensure that schools report to their local authority the removal of a child from the school roll in line with statutory and local authority guidance
- Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction – this must be in line with advice from the LCSB
- Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
- Ensure that appropriate filters and monitoring systems are in place to keep children safe online
- Ensure that children are taught about safeguarding, including online safety
- Ensure that an annual review of safeguarding arrangements is conducted.
- Undertake DSL level training.

Induction and Training

Induction

At the point of induction, **all** staff must be provided with, should read and should be trained in:

- Keeping Children Safe in Education October 2019 – Part One and Annex A
- The Safeguarding and Child Protection Policy and Procedure, including whistleblowing
- Staff Code of Conduct together with the Internet and eSafety Policy which includes use of social media and staff/pupil relationships and communications
- Children Missing from Education Policy

- Behaviour Policy
- Promoting British Values and Prevent Duty Policy.

At the point of induction, new staff must be informed of the names and role of the Designated Safeguarding Lead and Deputies.

Training

Staff employed in school

All staff employed in school and day nursery should receive safeguarding and child protection training in their induction and before they start work in their setting. This includes personal briefing from the Headteacher or Day Nursery Manager which covers everything specific to the policies, procedures and personnel of our setting. This is in addition to online training (via Lambeth) in Safeguarding, Prevent and Channel Awareness. Each academic year will begin with training in Safeguarding and Child Protection. Staff should also receive safeguarding and child protection updates regularly throughout the year, provided by the DSL (e.g. in staff meetings, INSET days, in emails), to provide them with relevant skills and knowledge to safeguard children effectively, for example, learning about the topics in Annex A (KSCIE October 2019). 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 are required to read KCSIE Part 1 and Annex A and this is revisited annually. They are expected to understand what this means in practice.

Third-party contractors

It is good practice for those employed as third-part contractors who work regularly in school with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role. This must include identifying safeguarding issues and what to do if they encounter one.

Volunteers will receive appropriate training, if applicable.

In all aspects the school and day nursery take its lead from KCSIE (October 2019) and Lambeth guidelines.

Teaching and Support for Pupils about safeguarding

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a 'sharing school' and that this includes speaking up about any concern, this is valued and actively promoted. This includes raising a concern about themselves or about another.

Safeguarding is taught in PHSE, assemblies and a range of programmes and workshops such as NSPCC PANTS and "Speak out, Stay safe". It is a feature of the Sex and Relations Education provision. Related topics may arise in literacy, topic and other educational experiences (e.g. current affairs). eSafety is a significant feature of our ICT Scheme of Work and features from the earliest age appropriate. Relationships Education is embraced in our PHSE programme but features also in assemblies, circle time and may arise in a range of areas such as literacy, history and other educational experiences. Year 6 are lead through the experience of puberty also the nature of relationships and sexual relationships including same sex. Social media is a specific feature of our transition work for Year 6 as they prepare to move to their senior schools. Whilst children at the school seem relatively sheltered we run workshops for parents and promote all aspects of their own best practice in managing their children's access to all things ICT and the internet, this includes regular email briefings and updates.

We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. The School Council is evidence of the manner by which children are encouraged to raise questions and concerns however this approach permeates all that we do in the pro-active manner by which we observe and intervene with children about any concerns, especially pastoral ones. Class Teachers are an essential to this provision and simple methodology such as use of first names to address teachers helps promote accessibility and communication.

All pupils know that there are adults to whom they can turn to if they are worried. If the school has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helplines such as ChildLine.
- We operate a peer house system whereby older pupils are encouraged to offer advice and support to younger pupils.

Recruitment – interview panels

At least one person conducting any short-listing of applicants also interview 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 (October 2019), and will be in line with local safeguarding procedures.

For further and full details see our Safer Recruitment Policy.

Staff who have contact with pupils and families

All staff who have contact with children and families (e.g. EYS staff) will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Staff Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our Staff Code of Conduct and Behaviour Policy and Internet Use and eSafety Policy and other related policies on data protection, access and storage of information, also taking, storing and using images of children policy. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

Further staff are not allowed to have a digital/social media relationship with a current pupil or after they have left the school. This applies until the 18th birthday of the child.

Mobile phones and cameras

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. In EYS mobile phones and similar devices which have a photographic function will be locked away when children are present.

Staff will not take pictures or recordings of pupils on their personal phones or cameras. This includes classroom displays especially where children feature (e.g. photo, art work) or are named.

The school provides school cameras for taking pictures and recording. These cameras should have images downloaded onto the Google Drive for sharing and the images should be deleted from the camera/disc before the device leaves the school site. For residential trips images will be held on the camera until the trip returns to school at which point they will be downloaded and then deleted from the device.

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.

Visitors, parents and relations

As a general rule, visitors including parents and relations are not allowed to take photos or recordings inside the school building or on site or at school functions EXCEPT where specific permission has been given by the Headteacher or Senior Leadership e.g. Sports Day, Interhouse Music competition, ballet displays i.e. public occasions when children are performing or competing. Permission will be given only to parents and relations and specific guidance will be given that such images (photos or recordings) must never be shared in a public forum but are for private viewing among family.

Managing 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 or volunteer has:

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

Reporting Concerns and Allegations

Concerns about another member of staff or adult including specific allegations should be reported directly to the Headteacher who is the DSL. The Headteacher will immediately report this to the Proprietor/Principal. See below for procedure.

Concerns about the Headteacher including any specific allegations should be reported directly to the Proprietor/Principal without informing the Headteacher. The Proprietor will liaise with LADO.

It 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. In all matters and actions guidance will be sought from the LADO (and police if appropriate).

The Role of the LADO and Police

The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the LSCP on the subject. The LADO will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the Designated Officer(s);
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Potential Suspension and Alternatives

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be

grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location e.g. for EYS staff to the Abbeville Nursery.

Definitions for outcomes of allegation information gathering

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher will inform the Proprietor/Principal and agree who should be the 'case manager' who will take the following steps:

- Immediately discuss the allegation with the LADO. 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 LADO – 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.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (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
- 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 LADO, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. 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
- **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 LADO 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
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- 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 considering what other support is appropriate.

- 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
- 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)
- 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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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 Teaching Regulation Agency.

Where the police are involved, wherever possible the Proprietor 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 LADO 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 LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required, and, if a teacher, to the Teacher Regulation Agency to consider prohibiting from teaching in relation to their professional conduct.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the LADO whether to refer the matter to the Teaching Regulation Agency 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 LADO, 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.

Press interest and Confidentiality

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site, would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

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.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other 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

Regardless of the outcome after any case where allegations have been made against an adult, we will review the circumstances of the case with the LADO 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

Complaints and concerns about the school's safeguarding policies

Complaints against staff

Complaints against 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

Other complaints

All other complaints will be managed in line with the Complaints Policy, a copy of which is available from the Headteacher.

Policy will be reviewed annually			
Policy reviewed:	Sept 16	By:	Principal & Headteacher
Policy reviewed:	Sept 17	By:	Principal & Headteacher
Policy reviewed:	Sept 18	By:	Principal & Headteacher
Policy reviewed:	Sept 19	By:	Principal & Headteacher
Policy reviewed:	Nov 19	By:	Principal & Headteacher
To be reviewed:	Sept 20	By:	Principal & Headteacher