



Safeguarding & Child Protection Policy

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Local Authority Designated Officer	<p>The duty LADO (Child Protection Officers) 0207 641 7668 LADO@westminster.gov.uk Main LADO – Aqualma Daniel Bi-Borough Service Manger</p> <p>Kembra Healy TEL: 07522 217 314 kembra.healy@rbkc.gov.uk</p> <p>Glen Peache, RBKC Director of Family Services 020 7361 2089 glen.peache@rbkc.gov.uk</p> <p>Natasha Bishopp, Head of Early Help Service 07739 316 9701 natasha.bishopp@rbkc.gov.uk</p> <p>Alex Handford, Head of Social Work for Families 07973 564 580 0207 598 4638 alexandra.handford@rbkc.gov.uk</p> <p>Chris Luke, Head of Social Work for Families 07714845704 christopher.luke@rbkc.gov.uk</p> <p>Jacquelyn Harrison, Head of Family & Care Resources 07896 253 580 jacquelyn.harrison@rbkc.gov.uk</p> <p>Jamieson Little, Head of Clinical Practice 07739316 335 jamieson.little@rbkc.gov.uk</p>
Other important contacts	<p>Nicky Crouch, WCC Interim Director of Family Services 07971 626055 ncrouch@westminster.gov.uk</p> <p>Julie Rooke, Interim Head of Assessment and MASH 07815 664213 jrooke@westminster.gov.uk Helen Farrell, Head of Social Work (from 3 February 2020) 07971 616258 hfarrell@westminster.gov.uk</p> <p>Nasheen Singh, Head of Looked After Children and Specialist Services 07870 481637 nsingh@westminster.gov.uk</p> <p>Jayne Vertkin, Head of Early Help 07812 760068 jvertkin@westminster.gov.uk</p> <p>Jo Early and Helen Rankin, Joint Heads of Clinical Practice 07890 380146 / 07966 184658 jearly@westminster.gov.uk / hrankin@westminster.gov.uk</p>

Local Authority Children's Social Services	<p>TEL: 020 7641 4000 EMAIL: AccesstoChildrensServices@westminster.gov.uk</p> <p>OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 7641 6000</p>
Multi-Agency Safeguarding Hub	<p>TEL: 020 7641 4000 EMAIL: AccesstoChildrensServices@westminster.gov.uk</p>
Support and Advice about Extremism	<p>Police Charing Cross Police station (24 hours) Agar Street, WC2N 4JP TEL: 020 7240 1212 Anti Terrorism hotline: 0800 789 321 EMERGENCY: 999 NON EMERGENCY NUMBER: 101</p> <p>Local Authority Westminster TEL: 020 7641 6032 EMAIL: prevent@westminster.gov.uk Prevent Lead: jknotts@westminster.gov.uk 07790980233</p> <p>Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk</p>
NSPCC Whistleblowing Advice Line	<p>ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk WEBSITE: www.nspcc.org.uk</p>
Disclosure and Barring Service	<p>ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: dbsdispatch@dbs.gsi.gov.uk</p>
Teaching Regulation Agency	<p>ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk</p>

OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk
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b. Key School Contact Details

Governors	<p>Chair of Governors Aatif Hassan TEL: +44 (0) 203 696 5300 MOBILE: 07956 665988 EMAIL: aatif.hassan@dukeseducation.com</p> <p>Nominated Safeguarding Governor Professor Mark Bailey TEL: 07469 258814 EMAIL: mark.bailey@dukeseducation.com</p>
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Lead (DDSL)	<p>DSL for the School Lisa Lobo TEL: 0203 9497416 DSL MOBILE: 07751 058869 EMAIL: l.lobo@eatonsquareschools.com</p> <p>Deputy DSL Esther Haworth, Hannah Sheehy DDSL MOBILE: 07925 221178 TEL: 0203 9497416 EMAIL: h.sheehy@eatonsquareschools.com, e.haworth@eatonsquareschools.com</p>
Designated Teacher for Looked After Children	<p>Lisa Lobo TEL: 0203 9497416 DSL MOBILE: 07751 058869 EMAIL: l.lobo@eatonsquareschools.com</p>
Head	<p>Caroline Townshend TEL: 020 3949 7417 EMAIL: c.townshend@eatonsquareschools.com</p>

2. Policy Statement

This policy applies to Eaton Square Senior School ("the School"). This policy is reviewed and updated annually (as a minimum) and is available on the School website and by request.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2021) ("KCSIE")
 - Disqualification under the Childcare Act 2006 (August 2018)
 - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (2018) ("WT")
 - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
 - The Prevent Duty: Departmental advice for schools and child care providers (June 2015)
 - The use of social media for on-line radicalisation (July 2015)
- Guidance for Full Opening: Schools (First Published August 2020 and updated regularly)

This policy also takes into account the procedures and practice of The Bi-Borough (Westminster, and Kensington & Chelsea) as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board and continued on by the Local Safeguarding Children Partnership

COVID-19

The School has a duty to follow the Government guidance in relation to actions all schools, including independent schools, are expected to take in order to minimise the risk of transmission of coronavirus (COVID-19) in their schools. This is public health advice, endorsed by Public Health England (PHE).

The rest of the guidance is focused on how the Department for Education (DfE) expects schools to operate in this new context. This includes:

- school operations
- curriculum, behaviour and pastoral support
- assessment and accountability
- contingency planning to provide continuity of education in the case of a local outbreak

This guidance has been prepared with input from school leaders, unions and sector bodies and in consultation with PHE and the Health and Safety Executive (HSE).

The School's Risk Assessment in response to this can be found in the policies section of the school website.

Staff who work directly with children read at least Part one of KCSIE 2021. Staff who do not work directly with children should read either Part one or Annex A (a condensed version of Part one) of this guidance

This policy should be read in conjunction with the Missing Student Policy. **Concerns about a Child**

The School has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes.⁸ Safeguarding and promoting the welfare of children is everyone's responsibility.⁹

Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Details of these arrangements are i) drop in sessions available with the school counsellor, ii) Form Tutors have time each week to follow up concerns during registration, iii) Form Tutors are supported by Heads of Sections in weekly meetings, iv) good relationships forged with Local Safeguarding Children Board.

a. Definitions of Safeguarding and Types and Signs of Abuse

Safeguarding and promoting the welfare of children is defined 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.

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 (e.g. via the internet). 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. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

b. Procedures for Dealing with a Concern about a Student

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the student) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. Staff are expected to provide a signed written record, including the date and time, the emotional state of the student, recording as much of the conversation in the student's own words as possible if a discussion has taken place. Report to be placed on CPOMS. Staff must then hand this to the DSL as soon as possible. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or their deputy).

Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by providing a student concern box for students to express their views and give feedback. This is checked by a member of the pastoral team on a weekly basis. The School operates its processes with the best interests of the student at their heart.

c. Contextual Safeguarding

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

d. Early Help

Any student may benefit from early help but all staff should be particularly alert to the potential need for early help for a student 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 in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.
- Has certain health needs
- Has mental health needs

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

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

The school counsellor is in for 2.5 days a week. They provide early intervention, school-based support, and weekly in-depth training programmes to improve the emotional well-being of students and teachers.

e. What staff should do if they have concerns about a student

If staff (including governors, agency staff and volunteers) have any concerns about a student (as opposed to a student being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a student's situation does not appear to be improving, the DSL should press

children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

f. What staff should do if a student is in danger or at risk of harm

If staff (including governors, agency staff and volunteers) believe that a student is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Westminster. A full copy of their local procedures can be found here <https://www.rbkc.gov.uk/lscb/about-us>

g. What staff should do if a student is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about students who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a student being drawn into terrorism they must call 999 or contact the Anti-Terrorism hotline: 0800 789 321. Advice and support can also be sought from children's social care.

The School, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect students from being drawn into terrorism and are regularly revised.

h. What staff should do if they discover an act of Female Genital Mutilation ('FGM')

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a student may be at risk of FGM.

i. What staff should do if they have concerns that children are at risk from or involved with serious violent crime

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

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

j. What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

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

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

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

k. What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

1. If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a Deputy DSL.

m. What staff should do if a student goes missing from education

Students who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for

dealing with children who go missing from education are found in the Missing Student Policy to be used for searching for, and if necessary, reporting, any student missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each student to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern³⁰

The School, via the Admissions Manager, will report to the School Admission Officers at Westminster City Council if a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

n. What staff should do if they have concerns about another staff member

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against either Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) at the Westminster City Council.

o. What staff should do if they have concerns about safeguarding practices in the school

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the policies section of the school website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

3. Arrangements for Dealing with Peer-on-Peer Allegations

Peer-on-peer abuse is abuse by one or more students against another student. It can manifest itself in many ways and can include bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse, initiation/hazing violence and rituals, sexting, sexual assault, gender-based issues³⁶ and harmful sexual behaviours including sexual violence and sexual harassment. The School has a zero tolerance approach to abuse and acknowledges that abusive comments and interactions

should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust.

The School recognises that students with special educational needs, disabilities and certain health concerns can be more prone to peer on peer group isolation or bullying including prejudice-based bullying than other students and will consider extra pastoral support for those students. The School recognises that these students may experience communication barriers and have difficulties in managing or reporting these challenges. The Head of Learning Enrichment, Mrs Esther Haworth, together with the pastoral staff will ensure that concerns regarding students with SEN are recorded and actioned.

The School takes the following steps to minimise the risk of peer-on-peer abuse. Firstly, the School recognises that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms. There is an active bullying log. There is an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive Wellbeing curriculum and assembly programme that tackles such issues as prejudiced behaviour and gives students an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. This is further supported by the Girls on Board programme which puts the onus on girls themselves to consider their role in the dynamic of relationship problems. There is whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. Signposting is made available to young people through a display board with support services on a wide range of issues so young people can seek their own solutions should they wish to. There is also a school council with a student voice to encourage young people to support changes and develop ‘rules of acceptable behaviour’ to help create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive.

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

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the LCSB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator. If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LCSB, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LCSB and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered. studentIn cases where nudes or semi-nudes have been shared the School will follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020) The School will not seek to criminalise those involved and instead support students and help them understand the consequences of their actions. The School will work closely with parents and may involve the police in a supportive capacity.

In the event of disclosures about student-on-student abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a comprehensive pastoral team at the School consisting of Form Tutors, Heads of Section, Deputy Head (Pastoral), Head and further support from external agencies will be sought, as appropriate.

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

- the victim;
- the alleged perpetrator; and
- the other students (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

4. Arrangements for Dealing with Allegations of Abuse against Teachers and Other Staff (including the Head, Governors and Volunteers)

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Local Child Safeguarding Board arrangements and applies when staff (including volunteers) have (or are alleged to have):

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- Behaved in a way that has harmed a student, or may have harmed a student
- Possibly committed a criminal offence against or related to a student or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is one of the Head OR to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head OR DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and designated officer. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the

views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA)). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

a. Arrangements for dealing with safeguarding concerns or allegations of abuse about supply teachers and External Contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency') and external contractors. The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher/external contractors due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency/company whether it is appropriate to suspend the supply teacher/external contractor, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers/external contractor being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency/company, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

5. Low level Concerns about staff behaviour

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors

At Eaton Square Senior School we recognise the possibility that adults working in the School may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Head without delay; any concerns about the Head should go to the Chair of Governors who can be contacted by email.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Head.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Head has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour

towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Low-level Concerns

- Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Head should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

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

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

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The School will maintain records until the individual leaves their employment.

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

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.

6. Staff Code of Conduct

The School's Staff code of conduct can be found in the policies section of staff sharepoint site. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place students or staff at risk of harm or of allegation of harm to a student.

7. Safer Recruitment

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment and Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the School's Visitor Policy.

During the process of recruiting governors, an s128 check is required.

8. Visitors

Visitors are welcome to Eaton Square Senior School and enrich the life and work of the School in many different ways. The learning opportunities and experiences they bring are encouraged and appreciated.

The School has a duty to protect the safety and welfare of students and staff and to ensure that any visits avoid disruption to the educational process. A balance must therefore be achieved between the potential benefits and risks associated with visitors to the school site. The School is equally responsible for ensuring that visitors comply with the guidelines, with our aim being to safeguard all children whether it be during school time or extra-curricular activities which are arranged by the School.

We aim to ensure all students at Eaton Square Senior School can learn and enjoy extra-curricular experiences, in an environment where they are safe from harm. It is our objective to establish a clear procedure for the admittance of external visitors to the School which is understood by all staff, visitors and parents and conform to child protection guidelines.

The School is considered to have control and responsibility for its students anywhere on the school site, during normal school hours, during after school activities and on school organised (and supervised) off-site activities.

The School has clear protocols for ensuring that visitors are appropriately supervised and suitable, as required in the Prevent statutory guidance (<https://www.gov.uk/government/publications/prevent-duty-guidance>).

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the ethos of the school alongside the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

School Protocol

Arrangements for visiting speakers

The School is required to undertake a risk assessment before agreeing to a visiting speaker being allowed to attend the School. This will take into account any vetting requirements

considered appropriate in the circumstances and may include a DBS check, if relevant. Appropriate checks will be carried out on the suitability of the visiting speaker which may include internet searches and/or contacting other schools where the person has spoken previously. Although not always possible, we try to invite speakers from a well-known company, charity or other groups whose aims are well documented. We make sure that we do not unintentionally use agencies that oppose each other with their messages or that are inconsistent with, or are in complete opposition to, the School's values and ethos. All external agencies and speakers will be expected to talk with the staff member in charge of coordinating events about the content of the presentation before the event.

As staff we will assess the suitability and effectiveness of input from external agencies or individuals to ensure that the content supports fundamental British Values and our School values, does not marginalise any communities, groups or individuals, does not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies. Our School does encourage students to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate or support this.

Visiting speakers, whilst on the school site, will be supervised by a school employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The e-Reception Book will keep a formal register of visiting speakers in line with its Data Protection Policy. The front desk staff will issue each visitor with a colour coded lanyard containing information about the DSL and procedures to follow in the event of a fire alarm/drill and if they feel unwell.

All regular visitors to the School must have DBS clearance (see Appendix 1 for definition of 'regular').

Any visitor who is not DBS checked must not be left alone with students at any point. This includes whole class or small group teaching or one to one interviews of students or escorting students around the building. If a visitor has DBS clearance, if agreed in advance, they may work with students unaccompanied by another member of staff. At times this may be teaching a class or a one to one interview.

Unknown visitors in School

Any visitor to the school site who is not wearing a colour coded visitor lanyard should be challenged politely to enquire who they are and their business on the school site. They should then be escorted to the front desk to sign in using the e-Reception book and be issued with a visitor lanyard. In the event that the visitor refuses to comply, they should be asked to leave the site immediately and the Head or Deputy Heads should be informed immediately. The Head and/or members of the senior leadership team will consider the situation and decide if necessary to inform the police. If a visitor becomes abusive or aggressive, they will be asked

to leave the site immediately and warned that if they fail to leave the School, police assistance will be called for.

Use of school premises for non-school activities

Where the school facilities are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) the Bursary will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Governing Body or proprietor, under the direct management of Eaton Square staff, our arrangements for child protection will apply. However, where services or activities are provided by another body this is not necessarily the case. The Bursar will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Bursar will also ensure safeguarding requirements are included in any transfer of control (i.e lease or hire agreement), as a condition of use and occupation of the premises that fail to comply with this would lead to the termination of the agreement. The Governing Body will have general oversight of these arrangements and are responsible for ensuring they are implemented.

Staff Development

As part of their induction, new staff will be made aware of this policy and will be asked to ensure compliance with its procedures at all times.

Vetting Requirements for Individuals in Regulated Activity

The Head and front desk staff must be notified when individuals in regulated activity will be on site and for how long so that they can ensure that the required checks are in place prior to the individual commencing work.

Definition of regulated activity

The definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

(i) Regular (see below) work in school with opportunity for contact with children. Not work by supervised volunteers. (ii) Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children, if done 'regularly' (iii) Relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional; applies to any child, even if done only once.

Regular (for the purposes of regulated activity)

For the purpose of assessing whether a person is working in regulated activity, 'regular' includes 'frequent' and these are defined together as follows:

Frequently (once a week or more often)
Or on 4 or more days in a 30-day period
Or overnight (between 2am and 6am).

If the individual meets or is likely to meet the definition of regulated activity the following checks are all required.

Proof of identity (and confirmation of the right to work in the UK)
Completed Application Form/ CV with full career/personal history i.e. no unexplained gaps
An interview which should include a person trained in Safer Recruitment, interviewers notes required
Confirmation of qualifications relevant to the activity
DBS disclosure and additional checks where an employee has lived outside the UK (not required for supervised volunteers)
A Barred List check
At least two satisfactory references
Medical fitness (not a requirement for volunteers)
Prohibition from teaching and prohibition from management check if applicable

The front desk is responsible for coordinating the above checks which must be completed before the individual can start (with the exception of the receipt of a DBS certificate providing it has been applied for, the Head has agreed that a written risk assessment is acceptable, all other checks above have been completed and the TP barred list has been checked). These checks can take several weeks so early communication is essential. No individual should start work until approved by the Head.

9. Management of Safeguarding

Dukes Governing Body has strategic leadership responsibility for their school's safeguarding arrangements. It is the headteacher's role to ensure that staff understand and follow policies and procedures agreed by Dukes Governing Body. The Head will facilitate a whole school approach to safeguarding, whereby safeguarding and child protection underpin all relevant policy and processes. All systems will operate with the best interests of the child at heart, and the school leaders and governors should ensure that there are suitable systems and means by which children can say what is happening to them and know that they will be heard. There is a zero-tolerance approach, even if there are no reported cases, staff must not take the view that it does not happen in our School.

The School's DSL Lisa Lobo, who is a member of the Senior Leadership Team.

Esther Haworth and Hannah Sheehy are the DDSL's and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are for contact to be made with MASH (020 7641 4000, AccesstoChildrensServices@westminster.gov.uk).

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Whilst the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

10. Proactive Approaches to Safeguarding

Our proactive approach to safeguarding includes the following:

- Form Period talks and sessions
- Wellbeing talks and lessons
- Advice and guidance through other mechanisms (House, School Council, etc)
- External speakers to talk to the students about a variety of issues; Internet safety, cyber bullying, screen time and abuse, etc.
- Clear expectations from the staff

School Counsellor

11. Training

Induction and training are in line with advice from the LSCB.

a. All Staff

All new staff will be provided with induction training that includes:

- the child protection policy;
- the role and identity of the DSL(s) and any DDSL
- the behaviour policy
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE* (and Part five of *KCSIE*).

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with a lanyard detailing important safeguarding information, the DSL and a link to the full safeguarding policy.

All staff are also required to:

- Read Part one of 2021 or the condensed version where applicable and agreed by the Head and Chair of Governors and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via updates in staff meetings, INSET days and weekly bulletins.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding through updates in staff meetings, questionnaires, INSET days and weekly bulletins.
- Receive training in safeguarding and child protection regularly, in line with advice from the LSCB. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, emails, bulletins and staff meetings.

b. DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

12. Oversight of Safeguarding, including Arrangements for Reviewing Policies and Procedures

Aatif Hassan is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The Annual Review forms part of the Summer Term Governors Review Meeting. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

13. The School's Arrangements to fulfil other Safeguarding Responsibilities

Teaching children how to keep safe

The governing body ensures that all students are taught about safeguarding, including online, through the curriculum and Wellbeing to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's ICT curriculum and also embedded in Wellbeing and relationships and sex education (RSE).

Students should be clear about what is expected of them online as offline (Teaching Online Safety in Schools, 2019, DfE) (Guidance for Safer working Practices 2020). The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group ([APWG | Unifying The Global Response To Cybercrime](#)).

The School has appropriate filters and monitoring systems in place to safeguard students from potentially harmful and inappropriate material online. The School's systems are managed by the external IT support. Such systems aim to reduce the risk of students being exposed to illegal, inappropriate and harmful materials online; reduce the risk of students being subjected to harmful online interaction with others; and help manage online behaviour that can increase a student's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any students on roll who are looked after by a local authority.

Lisa Lobo is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the School site, will be supervised by a school employee. On attending the School, visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. A full explanation of the School's procedures are found in the School's Visitor Policy.

Arrangements for off-site games and club venues, visits to Green/Hyde Park, visits to Church, Trips and Peripatetic lessons:

- Staff / student ratio is always adhered to
- Risk assessments completed and provided
- Safeguarding information given to staff
- Appropriate checks carried out

Relationships Education AND/OR Relationships and Sex Education ("RSE")¹³⁶

Relationships Education AND/OR RSE is compulsory from September 2020. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education AND/OR RSE.

(Relationships Education AND/OR RSE will form part of the School's Wellbeing programme).

Appendix – Signs and Types of Abuse

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect 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.¹⁵⁷

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.¹⁵⁸

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.¹⁵⁹

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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.¹⁶⁰

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.¹⁶¹ Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.¹⁶² Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹⁶³

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.¹⁶⁴

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate 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.¹⁶⁵

Serious violence: All staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Other indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.¹⁶⁶

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger.¹⁶⁷ Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting.¹⁶⁸ Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families¹⁶⁹); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.¹⁷⁰

Child sexual exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

- children who have older boyfriends or girlfriends, and

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

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

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

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

Some of the following can be indicators of CCE:

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

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

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of

transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

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

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

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including [● Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.¹⁷⁵

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

[● FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.¹⁷⁶ Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting or standing and may even look uncomfortable.
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return.
- A student is reluctant to undergo medical examination.¹⁷⁷

If staff have a concern that a student may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police¹⁷⁸ where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.¹⁷⁹ If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) [• or it involves a student over 18], teachers should follow the School's local safeguarding procedures.¹⁸⁰]

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. 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.¹⁸¹ Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmf@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.¹⁸² Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.¹⁸³ Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence

the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.¹⁸⁴

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.¹⁸⁵

Special educational needs and/or disabilities¹⁸⁶: Students with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.¹⁸⁷

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

Lesbian, gay, bi or trans ("LGBT"): Children who are LGBT can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.¹⁸⁸

Domestic abuse: The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours either as a pattern of behaviour, or as a single incident between two people over the age of 16, who are 'personally connected' to each other.: physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse.

The definition of Domestic Abuse applies to children if they see or hear or experience the effects of, the abuse; and they are related to the abusive person.

The National Domestic Abuse helpline can be called free of charge and in confidence 24 hours a day on 0800 2000 247.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse.

Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.¹⁸⁹

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a student may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.¹⁹⁰

Children who go missing from school: A child going missing from School is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions.¹⁹¹ The School's procedure for dealing with children who go missing can be found in the School's Missing Children Policy. All unexplained absences will be followed up in accordance with the Missing Children Policy.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Student Registration) (England) Regulations 2006 (as amended).¹⁹² This will assist the local authority¹⁹³ to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident)¹⁹⁴ of any student who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.¹⁹⁵

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has

launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.¹⁹⁷

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.¹⁹⁸

Authorised by

Caroline Townshend, Head



Approved by

Mark Bailey (Safeguarding Governor)

Date

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