



Devonshire House Preparatory School

## Safeguarding Children Policy

*This policy is for the whole school including EYFS*

Written by: Mrs S Piper	September 2018
This Policy is the responsibility of the Head and is annually reviewed with Governance.	September 2018 September 2019 September 2020 September 2021 September 2022 September 2023
Reviewed:	September 2024
Next review:	September 2025

*Updated with regard to the new KCSIE (September 2024) and in line with London Borough of Camden.  
If there are regulatory changes at any point during the academic year, this policy will be updated accordingly*

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to [hmpa@dhprep.co.uk](mailto:hmpa@dhprep.co.uk)

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## Key Personnel and Contact Details for Safeguarding at the School

### Key contacts

#### Designated safeguarding lead:

Senior Deputy Head Pastoral

Name: Louise Reen

Contact details: 020 7435 1916 ext 205

Mobile: 07932 047720

[dephdjs@dhprip.co.uk](mailto:dephdjs@dhprip.co.uk)

#### Deputy designated safeguarding leads:

Head of Nursery

Name: Paula Szpakowski

Contact details: 0207 435 1916 ext 252

[p.szpakowski@dhprip.co.uk](mailto:p.szpakowski@dhprip.co.uk)

Head of Learning Support

Name: Debbie Dixon

Contact details: 0207 435 1916 ext 634

[d.dixon@dhprip.co.uk](mailto:d.dixon@dhprip.co.uk)

#### Nominated Governor for child protection:

Name: David Goodhew

Contact details: [david.goodhew@dukeseducation.com](mailto:david.goodhew@dukeseducation.com)

07877 645837

**Camden Safeguarding Children Partnership**

5 Pancras Square  
N1C 4A3  
Contact details: 020 7974 6658/1276  
[CSCP@camden.gov.uk](mailto:CSCP@camden.gov.uk)

**Child protection service manager**

Name: Sonia Forbes  
Contact details: 020 7974 4351

**Local Authority Designated Officer (LADO):**

Name: Jacqueline Fearon  
Contact details: 020 7974 4556  
Email: LADO@camden.gov.uk

**Children's Contact Service/MASH team:**

Manager: Fatima O'Dwyer  
Tel: 0207 9741553/3317

**Camden online safety officer:**

Name: Jenni Spencer  
Tel: 020 7974 2866

**Safeguarding lead officers:**

Name: Michelle O'Regan (Head of Service – Children in Need) Tel: 020 7974 1905  
Name: Tracey Murphy (Service manager) Tel: 020 7974 4103  
Name: Patricia Williams (Service manager) Tel: 020 7974 1558

**Prevent Co-ordinator /Education Officer**

Name: Jane Murphy  
Tel: 020 7974 1008

**Virtual School Head**

Name: Natalie White  
Tel: 020 7974 2359

**If you suspect a CHILD is  
at risk of harm**



Senior Deputy Head Pastoral  
Louise Reen  
Designated Safeguarding Lead (DSL)  
02074351916 – ext 205  
Mobile 07932 047720  
[dephdjs@dhprep.co.uk](mailto:dephdjs@dhprep.co.uk)

**DSL unavailable?**



Head of Learning Support  
Debbie Dixon  
(DDSL)  
02074351916 – ext 634  
[d.dixon@dhprep.co.uk](mailto:d.dixon@dhprep.co.uk)



Head of Nursery  
Paula Szpakowski  
(DDSL)  
02074351916 – ext 252  
[p.szpakowski@dhprep.co.uk](mailto:p.szpakowski@dhprep.co.uk)



**London Borough of Camden's Children's  
Contact Service/MASH team**  
Manager: Fatima O'Dwyer  
020 7974 1553/3317  
[LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)

**Concerned about the behaviour of a  
member of DHS STAFF?**



Henry Keighley-Elstub  
Head  
[head@dhprep.co.uk](mailto:head@dhprep.co.uk)



David Goodhew (07877 645837)  
[david.goodhew@dukeseducation.com](mailto:david.goodhew@dukeseducation.com)



**Local Authority Designated Officer (LADO):**  
Jacqueline Fearon (020 7974 4556)  
Email: [LADO@camden.gov.uk](mailto:LADO@camden.gov.uk)

**Concerned about the behaviour of the  
HEAD?**

*(Without informing the Head)*



David Goodhew (07877 645837)  
[david.goodhew@dukeseducation.com](mailto:david.goodhew@dukeseducation.com)



**Local Authority Designated Officer (LADO):**  
Jacqueline Fearon (020 7974 4556)  
Email: [LADO@camden.gov.uk](mailto:LADO@camden.gov.uk)

**Concerned about the behaviour of  
David Goodhew?**

*(Without informing the Head or David Goodhew)*



**Local Authority Designated Officer (LADO):**  
Jacqueline Fearon (020 7974 4556)  
Email: [LADO@camden.gov.uk](mailto:LADO@camden.gov.uk)

## Introduction

This policy is written with regard to:

Keeping Children Safe in Education (September 2024) KCSIE

[https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping\\_children\\_safe\\_in\\_education\\_2024.pdf](https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf)

[Disqualification Under the childcare act 2006 \(September 2018\)](#)

[https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)

WT refers to the non-statutory but important advice Information sharing (2018)

[Relationships Education, Relationships and Sex education \(RSE and Health Education \(2019, Updated September 2021](#)

[Prevent Duty: Guidance for England and Wales \(July 2015, updated April 2021\) \(Prevent\)](#)

This is supplemented by non statutory advice and briefing note:

The Prevent Duty: departmental advice for schools and childminders (June 2015)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

The use of social media for online radicalisation (July 2015)

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

The Department for Education's filtering and monitoring standards

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

The School works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember **anyone** can make a referral directly to children's social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm.

Our school staff do not require parental consent to make such a referral to external statutory agencies.

If a direct referral is made by a member of staff, the DSL (or DDSL) should also be informed as soon as possible or in their absence the Head or our safeguarding governor.

This policy applies to all sections of Devonshire House School including Early Years, **Thereafter referred to as the 'School'**.

**Terminology:**

Safeguarding and promoting the welfare of children is defined for statutory purposes as: protecting children from maltreatment, inside or outside the home, including online; providing help and support to meet the needs of children as soon as problems emerge; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

**Child Protection** refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Early Help** means providing support as soon as any needs emerge or are identified at any point in a child's life.

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren)** includes everyone under the age of 18.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

It is the responsibility of the whole School to safeguard and promote the welfare of children and to take immediate action to protect them from harm or any risk of harm. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

Every child and young person should feel safe and protected from any form of abuse, neglect or exploitation, including from using technology. All staff understand that safeguarding is everyone's responsibility and must act swiftly when any concerns are disclosed or events witnessed.

Representatives of the whole-school community of pupils, parents, staff and governors will be involved in policy development and review. The school aims to involve all staff in shaping the school's safeguarding arrangements.

The Safeguarding and Child Protection Policy will be reviewed annually by Governance, unless an incident or new legislation or guidance suggests the need for an earlier date of review. This policy (which includes all sections and all of the appendices in this document) is one of a series in the School's integrated safeguarding portfolio. This policy has been authorised by Governance and is addressed to all members of staff (including all teaching and non-teaching staff, temporary part-time workers, support staff, contractors, and volunteers (hereafter 'staff')), is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

## **Policy Statement, Principles and Aims**

### **Policy Statement**

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued and to always consider the best interests of the child. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We operate within a culture of openness and recognise and accept that abuse can happen in any organisation.

### **Principles**

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment and to create an open environment where staff and pupils feel able to raise concerns, where concerns will be listened to and where support services and other agencies are readily involved:

- The School will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, gender, ability, culture, ethnicity, race, language, religion, beliefs, caste or disability or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they have any concerns and no child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs;
- All staff, including the Head are responsible for safeguarding the welfare of children as part of their professional duties;
- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm; the full version of KCSIE is available to all staff via the Staff Handbook;
- A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.
- The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Safer Recruitment policy;
- All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.
- The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with Camden Safeguarding Children Partnership (CSCP), the police, the LADO, health and other services to promote the welfare of children and to protect them from harm.

- Where requested to do so, the School will allow access for CSCP and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the School will comply with any request to supply information to the CSCP that it requires in order for it to perform its functions.

## Aims

- To ensure that effective, consistent safeguarding procedures are in place and followed by all staff, in accordance with national guidance and the locally agreed inter-agency procedures of Camden Safeguarding Children's Partnership (CSCP)
- To teach pupils, in an age-appropriate way, via PSHEE, Relationships and Sex Education and a varied curriculum, to develop the skills needed to identify, reduce and stay safe from abuse and to support their development in ways to foster security, confidence and independence. This includes educating pupils about the safe use of electronic equipment and access to the internet so they can stay safe from abuse or exploitation through technology of all kinds.
- To prevent harm by providing excellent pastoral care and to promote an ethos where pupils feel secure and able to talk and are listened to.
- To have methods in place which make it easy for children to report concerns as well as ensuring that all children know they can talk to any adult in the School if they are worried.
- To ensure that staff are recruited in accordance with the school's Recruitment and Selection Policy and in accordance with guidance in KCSIE (September 2024) and Disqualification under the Childcare Act 2006 (September 2018)
- To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible concerns about the welfare of children, or supposed cases of harm or abuse, including radicalisation, child sexual exploitation and online grooming and abuse.
- To ensure that all staff are confident to report any concerns and to deal with any disclosures.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, as well as support for these children.
- To identify, monitor and support children who may be in need of Early Help, including support from other agencies apart from Children's Services e.g.; Child and Adolescent Mental Health Services (CAMHS)
- For all staff to be aware of their responsibility to report any concerns about the actions of members of staff, volunteers, visitors or contractors.
- To be alert to the risks to children online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in School from potentially harmful and inappropriate online material. See also ICT acceptable use policy.
- To emphasise the need for good levels of communication between all members of staff.
- To promote effective working relationships with other agencies.

## Roles and responsibilities in Managing Safeguarding & Child Protection

### All Staff

All staff have a statutory responsibility to:

- Have read and understood at least part one of KCSIE and Annex A, as well as Annex B if they lead, manage or work directly with children. To also read Government advice: *What to do if you're worried a child is being abused* (March 2015).
- Provide a safe and supportive environment in which children can learn and understand how to keep themselves safe and manage risk;
- Have read and be familiar with this policy, the School's Staff Code of Conduct and whistleblowing procedures and be aware of systems, policies and procedures within the School which support safeguarding, including the School's Behaviour, Rewards and Sanctions Policies and Procedures and the School's Missing Pupil Procedures;
- Be aware of the signs of abuse and neglect, including child-on-child abuse, so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, and to report concerns to the DSL immediately.
- Be aware that even if there are no reports of child-on-child, or any other forms of abuse, it does not mean it is not happening, it may just not be being reported.
- Understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes
- Work with the DSL's and, if required, to support social workers to take decisions about individual children.
- Be alert to absenteeism of children and inform the DSL of concerns.
- Consider whether wider environmental factors are present in a child's life that are a threat to their safety (Contextual Safeguarding).
- Receive regular safeguarding refresher training, at appropriate levels, as and when required, at least annually, to keep up with any relevant safeguarding and child protection developments. The training will be in accordance with Camden Safeguarding Children Partnership guidance and will include local inter-agency working principles.
- Make a direct referral to CSCP immediately (and within one working day) if, at any point, there is a risk of immediate serious harm.
- Keep the school informed on an on-going basis of any information that might have implications for the safeguarding of the children in the school, for example where their relationships and associations both within and outside the workplace (including online) may have implications for the safeguarding of children in School
- Report to the Head any concerns about the conduct of adults, including low level concerns (including behaviour outside the School that may indicate a person is unsuitable to work with children).

## **Designated Safeguarding Lead (and Deputies)**

The School has appointed a Designated Safeguarding Lead (DSL) and two Deputy Designated Safeguarding Leads (DDSLs) who are all senior members of staff. The DSL has ultimate lead responsibility for all child protection matters in the School, including online safety. The DDSLs are trained to the same level as the DSL and in the absence of the DSL, carry out the functions necessary to ensure the ongoing safety and protection of children, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

During term time, the DSL and DDSLs are available during school hours, either on site or contactable by phone, for staff and parents to discuss any safeguarding concerns.

## **Responsibilities of the DSL**

The full responsibilities of the DSL are as detailed in KCSIE Annex C and are also detailed below:

### ***Managing referrals***

The Designated Safeguarding Lead is expected to:

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

### ***Work with others***

- Refer all cases of suspected abuse to Camden Safeguarding Children's Partnership (CSCP) and:
  - The Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and/or
  - Police (cases where a crime may have been committed).
- Liaise with the Head, as appropriate, to inform him of safeguarding issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Ensure the safeguarding governor, David Goodhew, is informed about safeguarding concerns, including any referrals.

### ***Training requirements: DSL and Deputy DSL***

The DSL's and Deputy DSL's will receive regular training, at appropriate intervals, as and when required (at least every 2 years), to provide them with the skills and knowledge required to carry out the role and to keep up with any developments relevant to their role. The DSL's and Deputy DSL's should undertake Prevent awareness training and also training in assessing and managing risks and managing reports and/or disclosures of sexual violence and sexual harassment.

In addition to the formal training set out above, their knowledge and skills should be

refreshed (this might be via e-bulletins, meeting other designated safeguarding leads at Camden designated teachers forums, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role in order that they can:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's Safeguarding Policy and procedures including online safety and the Staff Code of Conduct especially new and part time staff.
- Be alert to and support the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- Be responsible for procedures in the school and keep up to date, detailed, accurate records on CPOMS, that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Provide a systematic means of monitoring and supporting children known or thought to be at risk of harm or where there are ongoing concerns.
- Be aware of the requirement that children investigated by the police, whether the police are attending in school or interviewing the child at a police station, have an Appropriate Adult present. [www.safeguarding.link/pace](http://www.safeguarding.link/pace)
- Take lead responsibility for understanding the filtering and monitoring systems and processes in place in the School.

### ***Raising Awareness***

The DSL will ensure the School's policies are known, understood and used appropriately:

- Ensure the School's Safeguarding Policy and Staff Code of Conduct are reviewed annually and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with Governance regarding this.
- Ensure the Safeguarding Policy and Staff Code of Conduct are available publicly (through the School website) and parents are aware of the fact that referrals about suspected abuse or neglect must be made and the role of the School in this.
- Link with the local authority to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Ensure that all staff have received the required training and have signed to indicate that they have read and understood this policy, the Staff Code of Conduct which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils, and Part One of KCSIE and/or Annex A, and that they know who the DSL and Deputy DSL's are;
- Ensure that all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- Notify CSCP if a child with a child protection plan is absent without explanation.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social and Health Education (PSHEE) and/or Relationships and Sex Education (RSE).
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the School, in particular any pupils who go missing on repeat occasions. The School has a separate Missing Pupil Procedure and Attendance policy.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.

### ***Child Protection File***

- Where children leave the School, ensure their child protection file is copied for any new school or college as soon as possible, and within 5 days, but transferred separately from the main pupil file, [and that the child's social worker is informed], ensuring secure transit and that confirmation of receipt is obtained.
- In addition to the child protection file, consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- When a new pupil, who has a child protection file, joins the school, ensure key staff such as deputy DSL's and the rest of the safeguarding team are aware, as required.

### ***Previously Looked After Children (Care Leavers)***

- Designated safeguarding leads should also have details of the local authority Personal Advisor appointed to guide and support any child who is a care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

### ***Availability***

- During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff or parents in the school to discuss any safeguarding concerns. This also applies in the event that the school is closed during term time for any reason.
- Whilst generally speaking the designated safeguarding lead (or deputy) is expected to be available in person, though in exceptional circumstances availability via phone and/or Skype or other such mediums is acceptable.
- The designated safeguarding lead will ensure adequate and appropriate cover arrangements for any out of hours/out of term activities.

### ***Deputy DSL's***

- The deputy DSL's will be trained to the same standard as the DSL's. In the absence of the DSL, the functions of the DSL will be carried out by the deputy DSL. In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

### **Responsibilities of the Head**

- Ensure that the safeguarding and child protection policy and procedures adopted by the Governance, particularly concerning referrals of cases of suspected abuse and neglect, are implemented and followed by all staff;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace will be dealt with in accordance with the school's Whistle Blowing procedures, disciplinary procedures, and/or the procedures set out in this policy as appropriate.
- Ensure that children's safety and welfare is addressed through the curriculum.
- Receives the required child protection training and training in order to understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers.

### ***Responsibilities of Governance***

Governance will ensure that it (and, as appropriate, the School's leadership team and all staff) comply(/ies) with all requirements outlined in Part 2 of Keeping Children Safe in Education, including that:

- There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- There is an effective and statutorily compliant child protection policy and procedures in place, together with a Staff Code of Conduct (which should include acceptable use of technologies, staff/pupil relationships and communications including the use of social media) and that these are provided to all staff (including, as and where necessary, to temporary staff and volunteers, based on a proportional risk based approach) on induction;
- DSL's (and deputies) are appointed and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities.
- The School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (2018) through effective implementation of the child protection policy and procedures and good cooperation with local agencies;
- The School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures setup by the Local Authority.
- A named member of Governance:
  - has oversight of child protection matters, including monitoring of the School's legal duty to refer to the Disclosure and Barring Service;
  - liaise with the local authority and/or partner agencies on issues of child protection and

- instigate and oversee the annual review of this policy, which will include formal terms of reference incorporating best practice and/or independent corroboration and inspection of records.
- The School has statutorily compliant procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head (see part four of KCSIE);
- The School also has procedures in place to handle allegations against other children;
- The School has appropriate procedures in place to keep looked after children safe. In particular, that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- The School operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance (see part three of KCSIE and the School's Recruitment and Selection policy and handbook). The School will inform shortlisted candidates that online searches may be done as part of pre-recruitment checks
- The School operates an effective training strategy that ensures all staff, including the Head, receive child protection training, with refresher training at appropriate levels, as and when required (at least annually, with updates as required) in accordance with Local Authority guidance and to include Prevent and online safety training.
- The DSL and deputy receive refresher training at appropriate levels, as and when required (at least every 2 years), including inter-agency working and Prevent training
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governance meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding
- Governance should ensure that all governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our School are effective and support the delivery of a whole school approach to safeguarding. Their training should be regularly updated.
- The Proprietor and the Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.
- Where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after'.
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the School (see Missing Pupil Procedure), in particular any pupils who go missing on repeat occasions to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. Also, that being absent from School can be a warning sign of a

range of safeguarding concerns.

- Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback and any systems and processes should operate with the best interests of the child at their heart.

Governance recognises:

- Its responsibility to ensure that they have appropriate training and information so that they are equipped with the knowledge and skills to fulfil their functions.
- The importance of information sharing between professionals and local agencies as detailed in *Working together to safeguard children* and *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*.
- that while the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, it 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.
- Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.
- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Governance will ensure the child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:
  - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - 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 barriers.
- Its responsibility to assist all staff in taking responsibility for safeguarding as part of an overarching approach.
- Its responsibility to ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum.
- To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes.
- As part of this process, Governance will ensure that the School undertakes regular monitoring of filtering systems in place and regularly reviews their effectiveness.
- That it should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- It will consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.
- To have policies and procedures in place regarding pupils accessing the internet in school.

- The expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity will therefore be provided for all staff, particularly those with safeguarding experience, to contribute to and shape safeguarding arrangements and child protection policy.
- Its responsibility to ensure that the Child Protection policy reflects the different gender issues that can be prevalent when dealing with child-on-child abuse.
- Its responsibility to ensure sexting and the School's approach to it is reflected in the child protection policy.
- Its responsibility to ensure that the safeguarding arrangements take into account the procedures and practice of the Local Authority a part of the inter-agency safeguarding procedures set up by the Local Authority. This includes understanding and reflecting local protocols for assessment and the Local Authority threshold document along with supplying information as requested by the CSCP.
- That the department for education has published detailed advice to support Schools in the case of a report of child on child sexual violence or sexual harassment. This advice includes:
  - what sexual violence and sexual harassment look like,
  - important context to be aware of,
  - related legal responsibilities for schools and colleges and
  - advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

It is the overall responsibility of Governance to ensure compliance with child protection statutory requirements. Governance takes seriously its responsibility to uphold the aims of the policy and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of Safeguarding practice at the School enables Governance to ensure compliance with current legislation and to identify areas for improvement. Governance recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

### **Early Years Foundation Stage**

The Designated Person for dealing with child protection issues in the Foundation Stage will be the DSL. As she does not specifically work with EYFS children, in certain circumstances she may delegate elements of the responsibility to the Head of Nursery, Mrs Paula Szpakowski, DDSL, who may be better known to the child concerned. The DSL, or in her absence the Head of Nursery, will always be present at any parental or interagency meetings.

If Nursery staff have any concerns about children's safety or welfare, they should notify Mrs Szpakowski immediately.

The school has a strict policy on the use of pictures of children taken with cameras, mobile phones or other imaging devices:  
Unless items have permission from the Head or the Head of

Nursery, no member of staff may:

- Take photographs of any child other than with the Early Year's cameras
- Remove images of any child from the premises

Personal mobile phones may only be used in the staff room and are kept there at all times during the school day.

In addition to the training outlined below, all EYFS staff will receive training in order to understand the school safeguarding policy and procedures, and to ensure that all staff have up-to-date knowledge of safeguarding issues. Training will enable staff to identify signs of possible abuse and neglect at the earliest opportunity, and respond in a timely and appropriate way. These may include:

- significant changes in children's behaviour;
- deterioration in children's general well-being;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.
- All staff receive training in on line safety from NSPCC enabling them to understand the risks, to spot possible causes of concern and how to record and respond to issues which arise.

### **Good Practice Guidelines – 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 separate policy entitled Staff Code of Conduct, which includes guidance on one-to-one teaching, staff/pupil relationships and communication via social media.
- Staff should always avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.
- Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

To meet and maintain our responsibilities towards children, all members of the School community (Governance; staff as defined above; pupils and parents) are expected to adhere to the following standards of good practice:

- Reading and understanding all of the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Staff Code of Conduct, Anti-Bullying, Attendance Policy, Behaviour, Rewards and Sanctions Policies and Procedures, E-Safety Policy (including ICT AUP), First Aid, Missing Pupil Procedure, Data Protection policies, RSE Policy, SEND Policy, Social Media Policy, Whistleblowing Policy;
- Treating all children with respect;
- Setting a good example by conducting ourselves appropriately;
- Involving children in decision-making which affects them including regular

communication with children and ensure that children are and feel listened to (e.g. through safety questionnaires, participation in anti-bullying week, etc.)

- Encouraging positive and safe behaviour among children;
- Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language;
- Ensuring that all children are encouraged to talk to adults in School about any concerns, no matter how small they are and ensure that children feel comfortable doing so; and
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse.
- Understand that assessments of children should consider whether wider environmental or contextual factors are present in a child's life that are a threat to their safety and/or welfare.
- Understanding that children may not feel ready or know how to tell someone they are being abused.

### **Safer Recruitment**

The School is committed to safer recruitment, ultimate responsibility for which lies with the Governance. The Head and the School's HRM are responsible for implementing these procedures in practice. The School makes appropriate checks on all staff, including through the Disclosure and Barring Services (DBS) and obtaining and following up through references. See the School's Recruitment and Selection Policy for further details which complies with part 3 of KCSIE (September 2024), the Safeguarding Vulnerable Group Act (2006) and other relevant safeguarding recruitment guidance to ensure that no one is employed within, by or on behalf of the School who is unsuitable to work with children.

In some circumstances, and as long as specific criteria are met, a newly recruited member of staff may, if closely supervised, begin work without an enhanced DBS certificate or overseas police clearance. The conditions applicable are set out in the Recruitment and Selection Policy and include a requirement that all other checks are completed, including a Barred List check. The Head will also complete a DBS Risk Assessment reviewed every two weeks until the DBS certificate is received and, if applicable, the overseas police clearance is also received.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

In addition, as part of the shortlisting process, the school will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that may have happened, and are publicly available

online, which the school might want to explore with the applicant at interview. The School will inform shortlisted candidates that these online searches may be done as part of pre-recruitment checks.

### **Visiting speakers**

Visiting speakers are always vetted and checked for suitability and content of their presentations before they visit the school. Staff obtain permission from the Deputy Head for any speakers to visit the school.

On arrival, photographic evidence is required to check their identification and they will be asked to sign in the signing in book in reception. As they will be always supervised, a DBS or barred list check will not be required, unless it is deemed they may be undertaking regulated activity.

Information on any online research undertaken, references received (written or verbal on their suitability) etc. is collated in the visiting speaker's log. This is separate from the signing in book in the office.

The school visitor log will contain date of visit, company name, person's name, purpose of visit, ID checked references okay, online research undertaken, visit approved by and risk assessment checked if activity being undertaken requires a review.

Suitable online research might include a review of the visiting speaker's website or company information held at companies house, news articles of their visits to other organisations, comments made on [www.mums.net](http://www.mums.net) and should be limited to the suitability of them to present / undertaken tasks to children in the school.

Verbal references from other educational establishments or persons known to the visiting speaker will also be recorded in the visiting speaker's log.

### **Training and Staff Induction**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

New staff will receive online training on appointment as part of their induction, provided by NSPCC, which is in addition to training provided by the DSL and which includes:

- this policy;
- the Staff Code of Conduct (including the E-Safety policy);
- the Behaviour, Rewards and Sanctions Policies and Procedures
- the Missing Pupil Procedures
- the identity and the role of the DSL and deputies;
- a copy of Part One of KCSIE and Annex A and Annex B;
- Prevent online training;
- a copy of What to do if you're worried a child is being abused;
- the Whistleblowing policy;
- the Low level Concerns policy
- Anti-bullying policy
- To manage report of child on child sexual violence and sexual harassment
- How to report concerns through CPOMS.

Induction training will be completed before a member of staff or volunteer begins any

work for the school that involves contact with children. All staff will be required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents.

All staff are required to read the Safeguarding Policy and the Staff Code of Conduct annually and confirm they have done so.

All staff are required to read and understand the guidance for staff in Part 1 and Annex A of KCSIE and confirm they have done so. Mechanisms to assist staff in understanding KCSIE will include regular updates at staff meetings, spot checks by the DSL, quizzes, e-bulletins and more general support from the DSL and DDSL's.

All staff will receive child protection training at appropriate levels, as and when required in accordance with the Local Authority guidance and the pan-London training procedures. This training will include advice on protecting children from radicalisation as well as online safety. Such training, when arranged, takes priority over all other commitments.

All training will be delivered in accordance with Local Authority procedures and requirements, including being renewed as specified by the authority in frequency and content.

All staff are trained in how to listen, respond to and report any disclosures, including those which involve child-on-child sexual violence or sexual harassment.

In addition, supplementary training will be provided to all staff, at least annually. Such training may take the form of emails, e-bulletins, briefings, quizzes, staff training sessions, spot checks, etc.

The DSL and deputies will receive regular training at appropriate levels at least every two years, and updated as and when required to provide them with the knowledge and skills to carry out the role. This will include training in and attending at least one inter-agency working meeting where relevant information is then disseminated to staff; providing advice and support to staff on protecting children from radicalisation (Prevent duties); participation in child protection case conferences; supporting children in need; record keeping and promoting a culture of listening to children and safer recruitment.

Such training, when arranged, takes priority over all other commitments. This training will be supplemented (at least annually as appropriate) with additional training in specific safeguarding issues via LSCB to allow them to understand and keep up with any developments relevant to their role.

Governance will ensure that all governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction.

This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole School approach to safeguarding. Their training will be regularly updated.

The governor responsible for safeguarding has received safeguarding training specifically for governors and undertakes refresher training every two years, as a minimum.

A register will be taken by the School's HRM of attendees at each training seminar and training dates (and dates for future refresher training) logged alongside the Single Central Register.

Children with SEND and those who may be particularly vulnerable

Staff are aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse, including those with physical health issues. These children are also more prone to peer group isolation or bullying.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

Staff will be aware that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration as it might be due to abuse taking or have taken place.
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs.
- communication barriers may exist and difficulties in overcoming these barriers.
- cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the DSL or DDSL, Mrs Debbie Dixon, Head of Learning Support.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are particularly vulnerable: see Appendix 1 for a list of factors that may make a child particularly vulnerable to abuse.

Special consideration and attention includes monitoring through the pastoral systems of the School:

At DHS the form tutor system and CPOMs files as well as the regular minuted staff meetings, where the welfare of pupils of concern or in need is actively monitored and reported to the DSL and Deputy DSL, who advise on actions to take (including managing referrals), support mechanisms to provide and record-keeping.

Special consideration will also extend to the provision of safeguarding information, resources and support services in community languages and accessible formats where appropriate. It may also include, as necessary, the appointment of an appropriately trained and informed teacher to promote the educational achievement of any child who is 'looked after' or who is otherwise considered in need of such support. Where a member of staff is placed in a position of working with a 'looked after' child, they will be provided with all necessary information, including: the child's status, up-to-date assessment information from the relevant Local Authority, the most recent care plan, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

### **What to do when there are concerns or if a child makes a disclosure**

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to:

- identify, act on and refer the early signs of abuse and neglect;
- keep clear written records;

- listen to the views of the child;
- reassess concerns when situations do not improve;
- share information quickly and challenge inaction.

All staff at the School are expected to comply with statutory guidance Working Together to Safeguard Children (July 2018) unless exceptional circumstances arise. In particular, staff are expected to appreciate that effective safeguarding systems are those where:

- the pupil's needs are paramount, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates;
- all staff who come into contact with pupils and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children;
- all staff share appropriate information in a timely way and can discuss any concerns about an individual child with colleagues and local authority children's social care;
- appropriately qualified, experienced staff are able to use their expert judgement to put the pupil's needs at the heart of the safeguarding system so that the right solution can be found for each individual pupil;
- all professionals contribute to whatever actions are needed to safeguard and promote a child's welfare and take part in regularly reviewing the outcomes for the child against specific plans and outcomes.

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive. It is more common with primary aged children for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. There may also be a change a pupil's or art or written work which may show signs of confusion or distress.

Staff should be aware that younger pupils may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns. Concerns may also be raised about a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy give details of some of the types of abuse and safeguarding issues with which staff should be familiar.

### **Procedures if staff have a concern about a pupil**

If a member of staff is concerned about a pupil, the matter should be referred immediately to the DSL, or deputy in the DSL's absence.

Staff may speak directly to the DSL (or DDSL) to discuss their concerns or may enter their concern straight onto CPOMS for attention by DSL.

In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day. (see section on recording concerns)

If a child is in immediate danger or is at risk of harm, a referral should be made to CSCP immediately (and within one working day), or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral.

There will be occasions when you suspect that a child may be at serious risk, but you haven't 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

In all instances, a written record must be made by the member of staff on CPOMS, which all staff have access to. Any member of staff who cannot access CPOMS for any reason must contact the DSL directly and without delay.

### **If a child discloses information to you**

It takes a lot of courage for a child to disclose that they are being neglected and/or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

### **The member of staff should:**

- Listen carefully and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Allow them to speak freely.
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the child.
- When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- Know that abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim will never be given the impression by our staff that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- Do not promise confidentiality. If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality as this may ultimately not be in the best interests of the child. The point at which you make the child aware of this is a matter for professional judgment. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise. Explain that you have to make sure that the pupil is safe and you will

need to ask other adults to help you to do this

- Do not cross question the pupil. You must not ask leading questions, that is, a question which suggests its own answer; such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this.
- Let the pupil tell you what he or she wants to and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Be prepared to follow up with the pupil, but only in conjunction with advice from the DSL.
- Be aware that younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class.
- If a pupil wants to show you his or her injuries, **please try and insist that this must wait for a health professional to make an assessment. No child or pupil should be asked to undress to show their injuries to a member of staff.**
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.
- If the report includes an online element, be aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child but to confiscate any device which they believe (with good reason) to have any such images stored on it, and pass the device immediately to the DSL.
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Follow the procedure outlined below: Taking action: advice for staff
- Write up your conversation as soon as possible on CPOMS or the record of concern form and hand it to the DSL.
- Know that you have a professional responsibility to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and children's social care. Take advice as necessary from the DSL if you are unsure about anyone with whom you should/should not be sharing information.
- Seek support if you feel distressed.

### **Taking action: advice for staff**

Key points to remember for taking action are:

- In an emergency take the action necessary to help the child, for example, call 999;
- Report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in section 28 of this policy should be followed;
- If the DSL is not available, ensure the information is shared with the deputy DSL (or in their absence, with the most senior person in the school) that day. If there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately (and within one working day). See paragraph 15 below;
- Do not start your own investigation;

- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Complete and submit a record on CPOMS and seek support for yourself if you are distressed.

### **Reporting directly to child protection agencies**

Referrals about an individual pupil must be made to the borough in which the pupil resides. However, advice may be obtained from Camden Children's Services, regardless of where the pupil resides.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to CSCP (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

If staff members have any concerns (as opposed to a child being in immediate danger) about a child they should raise these with the DSL or a Deputy DSL. The DSL should usually help decide whether a referral to CSCP, Early Help or other support is appropriate, which must be done in accordance with the referral thresholds set by the local authority.

The DSL follows the Levels of Need thresholds from Camden Safeguarding Children's Partnership (CSCP) when decisions are made about making referrals. The School will ensure that as a relevant agency it should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as a part of local arrangements. The DSL and DDSL will be familiar with Camden Safeguarding Children's Partnership local threshold document.

If a referral to CSCP is appropriate in most instances the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.

If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.

If a child is in immediate danger or is at risk of harm a referral should be made to CSCP and/or the police immediately (and within one working day). Anybody can make a referral.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the MASH team at Camden in the first instance for advice on how to refer (you may be referred to another Local Authority Safeguarding Partnership or MASH team).

The MASH team will require basic information from you such as:

- Your name
- Address
- Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries, and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

If anyone other than the DSL makes the referral, they should inform the DSL as soon

as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. If Early Help is appropriate, the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If Early Help and/or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

Other ways to report your concerns:

NSPCC – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence, or text anonymously to 88858.

[NSPCC When to call the police](#) can be used for guidance.

The DFE also have a number for non-emergency advice – 020 7340 7264.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call **0800 028 0285** or email [help@nspcc.org](mailto:help@nspcc.org).

The referral process is also followed when there are concerns about a pupil who may be at risk of radicalisation. The level of risk will identify the most appropriate referral, which could include Children's Services and/or Channel. Channel provides support at an early stage to people identified as being vulnerable to being drawn into terrorism.

## Recording Safeguarding Concerns

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight, and respectful challenge, as well as effective recording, reporting and monitoring systems.

All staff have an appropriate level of access to CPOMS which enables them to record concerns. The DSL has full access to enable them to record actions and store all safeguarding records securely.

- All safeguarding concerns must be recorded on CPOMS, the school's management system for safeguarding.
- If the DSL is not available for any reason, the DDSLs must be contacted to deal with the concern initially.
- With regard to any conversations directly with a pupil or overheard, staff must keep a written record of the conversation and concerns arising.
- The record should include the date, time, and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
- The record should be specific. Record actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.
- Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
- The record should contain facts and information only, taking care to avoid personal opinion.

- Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.
- The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
- Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

### **Action by the DSL on receipt of a concern about a child**

On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- (a) monitoring the pupil in school
- (b) a discussion with parents
- (c) early help intervention from the school and/or another agency
- (d) referral to Children's Services
- (e) referral to the LADO
- (f) report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

The DSL (or in their absence, the DDSL) will make a referral to CSCP immediately if it is believed that a child has suffered or is at risk of suffering significant harm.

In situations where a pupil is not at risk of suffering significant harm but is instead in need of early help or additional support from one or more agencies (referred to as a child 'in need'), the DSL will still liaise with CSCP in accordance with inter agency procedures and, depending on their advice, will complete an Early Help Assessment or engage with any other approach offered by CSCP (e.g. 'Team around the Child') to ensure assessment/referral of the pupil and/or his parents for appropriate social care services.

Many School pupils are resident in other boroughs; in these cases a CAF form or details of other local approaches (e.g. 'Team around the Child') will be obtained by contacting local children's services team for the borough of residence.

If there is room for doubt as to whether a referral should be made, the DSL will consult with CSCP on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to CSCP will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the CSCP within 24 hours. If no response or acknowledgment is received within one working days, the DSL will contact the CSCP again.

The local authority should make a decision, within one working day of a referral being

made, about the type of response that is required and should let the DSL know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The DSL will follow up if this information is not forthcoming.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out below.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

### **Preserving evidence**

- All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the pupil to delete it.
- Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.
- Report the matter to the DSL immediately
- Also see DfE Searching Screening and Confiscation Advice for schools and the UKCI Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared.

### **Child protection records**

- Safeguarding records are kept securely on CPOMS
- There is a clear, detailed chronology for each pupil where concerns have been raised.
- Written records are kept of all concerns, whether or not there is a need to

refer the matter to Children's Services or another agency. If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.

- All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on CPOMS.
- The CSCP has its own referral form which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.
- Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil will be retained in the pupil's file and will be scanned into CPOMS.
- Any new concern or information about a pupil who has active involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
- Any new concern or information about a pupil who has had previous involvement with Children's Services must be passed to Children's Services without delay.
- If a pupil moves to another school, all child protection records are transferred securely, within 5 days, to the DSL at the new school and a receipt is obtained confirming they have been received.
- Parental permission is not required for records to be shared with the new school.
- On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.
- Safeguarding records will be requested from previous schools/nurseries for any new pupils joining the school.

### **Information sharing**

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSL, a deputy DSL, or Governance. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The School will co-operate with police and CSCP to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children (2018). In particular, data protection legislation and guidance about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Information will be shared according to the HM Government guidance Information Sharing (July 2018).

The guidance states that the information shared should be:

- (a) Necessary and proportionate - Any information shared must be proportionate to the need and level of risk.
- (b) Relevant - Only information that is relevant to the purposes should be shared with those who need it.
- (c) Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

- (d) Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- (e) Timely - Information should be shared in a timely fashion to reduce the risk of harm.
- (f) Secure - Wherever possible, information should be shared in an appropriate, secure way.
- (g) Record - Information sharing decisions should be recorded whether or not the decision is taken to share.

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and CSCP to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be stored securely and only made available to relevant individuals.

### **Notifying Parents**

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will normally make contact with the parent in the event of a concern, suspicion or disclosure. However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from CSCP. If the allegation involves a member of staff, the parents should only be informed with the LADO's consent.

For the avoidance of doubt, referrals to CSCP or the LADO do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

If a parent has any safeguarding concerns, he/she should contact the school's DSL as soon as possible.

### **Early Help'**

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of *Working Together to Safeguard Children* (July 2018) provides detailed guidance on the early help process.

All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

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

- is disabled and has specific educational needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit. When a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil.

Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

Where a child and family would benefit from coordinated support from more than one agency e.g. education, health, police, there should be an inter-agency early help assessment. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. If Early Help is appropriate and where they are not taking the lead, the DSL will support the member of staff liaising with other agencies and setting up inter-agency Early Help assessment as appropriate.

The Early Help assessment will be undertaken by a lead professional who will provide support to the child of the family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role may be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator).

Decisions as to who performs this role will be taken on a case by case basis and will be informed by the child and their family.

For an Early Help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers and should involve the child and their family as well as all of the professionals who are working with them;
- a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority; and
- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgment as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Effective early help in a school setting involves the school (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case, this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to children's social care if the child's situation does not appear to be improving.

A summary of the Early Help provided in-house at DHS is provided in Appendix 4

### **Acceptable Use of Technology (including in the EYFS)**

(Also see E-Safety Policy)

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place.

To protect children, we will:

- seek their and their parents' consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- when photographs of pupils are published, we use only the child's first name with an image unless parents have consented for the pupil's full name to appear next to the image;
- ensure that children are appropriately dressed;
- encourage children to tell us if they are worried about any photographs that are taken of them.

Staff must not take video footage or photographs of pupils except for School purposes. Any such images must not be placed in the public domain without the permission of the Head.

- School devices should be used whenever possible.
- If a personal device is used, photographs or videos of pupils must not be stored or retained on personal cameras, mobile phones or other devices. Any images must be uploaded to the School server as soon as possible and permanently

- deleted from the personal device.
- Permitted images are stored securely on the School's intranet and deleted when no longer required.
- Cameras, mobile phones or other photographic devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or upset.
- Parents and carers are asked to restrict photography, whether on cameras, mobile phones or other digital devices to major school events published in the school calendar only. General filming in the School by parents and carers is never permitted.
- Parents and family members are welcome to take photographs or videos of school events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet.
- The general use of mobile phones in all areas of the School by parents is not permitted.
- Staff may only communicate with pupils through the School email system and the designated platforms used by pupils for homework.
- Staff must not use their mobile phones or other personal devices for calls or messaging when with pupils and all devices must be locked away, out of sight.
- From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.
- CCTV is located around the School but is not installed in classrooms, changing areas or toilet areas.
- If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Staff Code of Conduct.

Flash photography can cause distress or trigger seizures in those with medical conditions and therefore should not be used.

### **Secure premises**

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

Identification badges: Governance and members of staff, including volunteers will receive a photo ID badge with the title 'staff', or '(vetted) volunteer' (as appropriate), which must be clearly displayed and worn at all times whilst on the School premises in term time.

InVentry: The School uses the InVentry system to sign in all staff and visitors, including contractors. All visitors must sign in on arrival and sign out on departure. A photograph ID sticker is generated for all visitors which should be worn for the duration of the visit. Visitors are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a lanyard with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. Staff are

encouraged, when they feel comfortable and safe to do so, to challenge any person they come across who is not displaying one of these badges.

### **Abuse of trust and inappropriate relationships**

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 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

- (a) intentionally touch a child in a sexual way;
- (b) have a sexual relationship with a child, even if the relationship is consensual;
- (c) cause or incite a child to engage in sexual activity;
- (d) intentionally engage in sexual activity in the presence of a child; or
- (e) for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity.

A position of trust could arise even if the member of staff does not teach the child. A child for these purposes is a person under the age of 18.

### **Complaints about staff and poor or unsafe practice**

All complaints and concerns will be considered carefully by the School and appropriate action will be taken.

Where parental, staff or pupil complaints raise safeguarding concerns about a member of staff, the person to whom the complaint has been made must follow the procedure for referral of concerns set out in Section 29 below. The school will follow the guidance in Part 4 of KCSIE and the procedures of Camden Safeguarding Children's Partnership (CSCP).

The School's complaints procedure will normally be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace. The complaints procedure is available to all parents and staff via the School Policies page of the school's website.

Every pupil should feel able to raise concerns with any member of staff whom they feel they can trust. Staff who hear about concerns, suspicions or allegations from a pupil must relay the concerns immediately and appropriately to the relevant person – usually this will be to the DSL or one of the Deputies.

Complaints from staff involving wrongdoing in the workplace are dealt with under the school's Whistleblowing, Complaints and Disciplinary and/or Grievance procedures. See also Low Level Concerns Policy. The School's staff procedures are available via the staff handbook. If in doubt, please speak to the Head in the first instance.

A Whistleblowing policy is in place whereby staff can report concerns about the behaviour of colleagues, or where they are concerned that their own actions might be misconstrued. This procedure is detailed in the Staff Code of Conduct.

### **Whistleblowing**

Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. The Whistle Blowing policy, which is reflected in staff training and the Staff Code of Conduct, is in place for such concerns to be raised with the School's management team (SLT) and/or Governance. No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8.00 AM to 8.00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### **Allegations against Staff**

The DfE has issued statutory guidance which all schools and local authorities must follow when a potential child protection allegation is made against a member of staff. The guidance is contained within Part 4 of the document: Keeping Children Safe in Education (as updated for 2024). It is expected that all staff and Governance involved in the management of allegations of abuse made against a member of staff or volunteer will comply at all times with statutory guidance. Staff must never think that abuse by an adult is not possible in this School, or immediately disbelieve an accusation against someone who is well known and trusted.

The School's procedures for dealing with allegations made against staff or volunteers will be used where a member of staff has any safeguarding concerns about another member of staff or a volunteer. Allegations that might indicate that a person is unsuitable to work with children are where a person has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This procedure relates to members of staff who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this School.

Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police. Historical allegations of abuse will also be referred to the police.

Where the school has information to indicate that the former staff member is working with children in another location this should also be reported to the LADO in that location and to the senior management of the school where that member of staff is currently working.

### **Reporting an allegation or concern**

If an allegation is made against a member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

- A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head, unless the Head is the one against whom the allegation is made.
- An allegation against the Head should be reported to the Safeguarding

Governor, without notifying the Head first.

- All allegations, complaints, concerns or suspicions against staff or volunteers at DHS, should be reported directly to the Head, who will report this to Governance.
- In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Safeguarding Governor, the Chairman of Dukes Education – Mr Aatif Hassan should be contacted directly and without hesitation. He will then contact the LADO immediately for further advice.
- Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

### Reporting an allegation or concern

- If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police **MUST** be made immediately.
- An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Camden Safeguarding Children's Partnership (CSCP), who will advise on the next steps to be taken.
- Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken.
- Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.

There are two aspects to consider when an allegation is made:

- Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
- Investigate and support the person subject to the allegation. The LADO may choose to appoint a case manager. The case manager (usually the Head, unless the Head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- The Head will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- The Head will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- Any allegation against employed staff or volunteers, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.
- An initial assessment of any allegation referred will be made by the LADO and the Head. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary or low-level concerns procedures.
- Where the initial discussion leads to no further action, the case manager and the LADO should:
  - record the decision and justification for it; and
  - agree on what information should be put in writing to the individual concerned and by whom.
- Where further enquiries are required, the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases,

the investigation will normally be undertaken by the Head, but in some instances it may be appropriate to appoint an independent investigator as advised by the Camden Safeguarding Children Partnership

- In the case of a referral and investigation, the Head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies
- Where there are no objections from the investigating agencies, the Head will:
- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.
- The Head, in consultation with the LADO, will make the decision whether or not to suspend the teacher / member of staff involved.
- If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. *The Education Act (2011)* prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- The Head will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
  - Who needs to know and exactly what information can/cannot be shared
  - How to manage speculation and gossip
  - What, if any, information can be given to the wider community to reduce speculation
  - If necessary, how to manage the press.
- The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. He/she will also be given access to welfare counselling and medical advice. He/she will also be given clear instructions about the need for confidentiality and his/her responsibility to avoid any contact with any pupils or families involved in the investigation.
- Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

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

- a) **Substantiated:** there is sufficient evidence to prove the allegation;
- b) **False:** there is sufficient evidence to disprove the allegation;
- c) **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- d) **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does

not imply guilt or innocence.

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

### ***Action to be taken against the accused:***

The Head will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended, he/she will also be kept up to date with current work-related issues.

Where an investigation by the police or CSCP is unnecessary, the LADO will discuss the steps to be taken with the Head. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

### ***Suspension***

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- a) there is cause to suspect a child or other children at the School is or are at risk of significant harm or
- b) the allegation is so serious that it might be grounds for dismissal.

If the Head or DSL is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified based on such concerns alone.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

### ***Criminal proceedings***

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

### ***Return to work***

If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The School

will also consider how to manage the contact with the child[ren] who made the allegation.

DBS and TRA Referrals and ceasing to use staff

NB There is a legal duty to refer to the DBS anyone who has:

1. Engaged in 'relevant conduct':

Relevant conduct in relation to children is conduct which:

- a) Endangers a child or is likely to endanger a child If repeated against or in relation to a child, would endanger a child or would belikely to endanger them
- b) Involves sexual material relating to children (including possession of such material
- d) Involves sexually explicit images depicting violence against a person (including possession of such images), if it appears to DBS that the conduct is inappropriate
- e) Is of a sexual nature involving a child, if it appears to DBS that the conduct is inappropriate.

A person's conduct endangers a child if they:

- a) Harm a child,
- b) Cause a child to be harmed,
- c) Put a child at risk of harm
- d) Attempt to harm a child, or
- e) Incite another to harm a child.
- f) Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or
- g) Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website, or call the helpline for advice).

1. Satisfied the harm test;

There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns, which satisfy the harm test.

To satisfy the harm test there needs to be credible evidence of a risk of harm to children. For a case to be considered as a risk of harm, there must be tangible evidence rather than a "feeling" that a person represents a risk to children. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

2. Received a caution or conviction for a relevant offence;

and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Referrals should be made as soon as possible after the resignation or removal of the individual.

Failure to make a Referral to the DBS in such circumstances constitutes an offence.

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met – see above – as per the guidance published by the DBS.

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met – see above – as per the guidance published

by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA. For information, the reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school, immediate action will be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work and must therefore be suspended.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

### **Timescales**

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

### **Unsubstantiated, false or malicious allegations**

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the school reserves the right to contact the police to determine whether any action might be appropriate.

### **Record keeping and references**

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal pension age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will

be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be false, malicious or unsubstantiated, reference will not be made in employer references.

### **Allegations relating to supply teachers/employees of third party**

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'). The School will usually take the lead, but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the School decide to cease to use a supply teacher 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 whether it is appropriate to suspend the supply teacher, an investigation is carried out but this decision rests with the Head and the LADO.

### **Learning lessons**

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager 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.

This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

### **Low-Level Concerns**

See also Low-Level Concerns Policy

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone/other device
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language,
- Email, messaging, use of social media sites or other communication

between adults and pupils outside agreed protocols

- Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

Staff must report any low-level concerns whatsoever to the Head or Safeguarding Governor.

The Head will be the ultimate decision maker in respect of all low-level concerns. The Head may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises.

Staff are also encouraged, and to feel confident if the need arises, for them 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.

When a low-level concern has been raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include:

- details of the concern.
  - the context in which it arose.
  - evidence collected by the Head where the concern has been raised via a third party.
  - the decision categorising the type of behaviour.
  - action taken.
  - the rationale for decisions and action taken.
  - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- 
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
  - Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
  - The purpose of low-level reporting is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
  - Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
  - A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set

- out in the School's Whistleblowing Policy.
- If there is any doubt as to whether a low-level concern meets the harms threshold, then the Head will consult with the LADO.

### **Use of school premises by external organisations**

Our Board of Governors will ensure that when our School hire or rent out our facilities to organisations or individuals (for example to service providers to run extra-curricular activities) that appropriate arrangements will be in place to keep children safe. If the School receives an allegation relating to an incident that happened when an individual or organisation was using the school premises, as with any safeguarding allegation, the School will follow their safeguarding policies and procedures, including informing the LADO.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The Board of Governors will also ensure safeguarding requirements are included in any service level agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. (KCSIE 2024, paragraph 167).

### **Health & Safety, Extended School Activities and Educational Visits**

The School's Health and Safety and Educational Visits procedures are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips we will check that effective child protection arrangements are in place. All staff are bound by the school's Educational Visits Policy when arranging and organising off-site trips.

The DSL closely monitors the conduct of pupils and staff on trips and pupils, trip leaders and assistant leaders are actively asked for feedback following every trip that involves an overnight stay.

### **Pastoral and Safeguarding Education**

The School promotes the welfare of children through the Assembly Programme, PSHEE curriculum, the ICT curriculum and parents' forums. Pupils are taught how to keep themselves safe and build resilience (including building resilience to radicalisation).

Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm.

### **Monitoring and review**

Any child protection incidents at the school will be followed by a review of the

safeguarding procedures within the School and a prompt report to Governance. Wherean incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures.

In addition, the DSL will ensure that this policy is reviewed annually and its procedures and implementation are updated and reviewed regularly, working with Governance as necessary. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay and a report made to Governance.

Governance will undertake an annual review of this policy and its procedures including good cooperation with local agencies and of the efficiency with which the relevant duties have been discharged. The annual review and any changes to the policy will be signed off by Governance at a full meeting, where the review will be discussed and discussion minuted.

All staff will be regularly reviewed on their own safeguarding practices and given opportunities to discuss concerns they may have about welfare and safeguarding matters.

#### **Related safeguarding portfolio policies and procedures**

All related policies and procedures are available via the Staff Handbook on the VLE or under policies on the staff section of the school drive. Those available to parents are on the policies pages of the website.

## Appendix 1

### Categories of abuse and Specific Safeguarding Issues

#### Definitions of abuse

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment.

All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. In most cases, multiple issues will overlap with one another.

All staff must be prepared to act on disclosures from any child or parent/carer which may be occurring or witnessed outside of the School.

KCSIE 2024 provides a definition of abuse as:

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, when children see, hear or experience domestic abuse and its effects.

The legislation does not define the line between 'harm' and 'significant harm'. Staff should give 'significant' its ordinary meaning (i.e. considerable, noteworthy or important). The child's particular characteristics also need to be taken into consideration. For example, a child left home alone at the age of 3 could be at risk of significant harm, whereas a child aged 13 years may be less likely so. The test will be subjective to the particular circumstances.

Whether the harm is significant is determined by comparing the child's health and development with what could reasonably be expected from a similar child. For example, if a child is failing to meet developmental or physical milestones, it is necessary to determine whether this is the result of a lack of "good enough" parenting. There is no clearly defined criteria to judge whether harm meets the threshold of 'significant'—it can be the result of a traumatic event or a compilation of acute and long-standing events. As highlighted in *Working Together*, "Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm."

The following factors should be considered in understanding and identifying significant harm:

- The nature of harm, in terms of maltreatment or failure to provide adequate care;
- The impact on the child's health and development;
- The child's development within the context of their family and wider environment;
- Any special needs, such as a medical condition, communication impairment or disability, that may affect the child's development and care within the family;
- The capacity of parents to meet adequately the child's needs; and
- The wider and environmental family context.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or

technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

KCSIE Sept 2024 also states the following:

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

The DSL will ensure that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked. Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a pupil exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a pupil showing such signs.

There are four categories of abuse as defined in Part 1 of KCSIE as updated (September 2024):

- physical abuse,
- emotional abuse
- sexual abuse
- neglect,

Factors which may make a child particularly vulnerable to abuse include:

- Showing signs of abuse, neglect and exploitation
- living in an identified domestic abuse situation
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- affected by known parental substance misuse,
- affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- do not have English as a first language.
- 'Looked After' Children (LACs) or children in care or who have returned home to their family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care. NB A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL or DDSL. In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to CSCP. Staff members working with children are advised to maintain an attitude of 'it could happen here' where

safeguarding is concerned.

### **Recognising signs of 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.

There isn't one sign to look out for that will prove that a child is being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated.

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;
- cigarette burns, human bites or outline of an object used
- scarring, scalds and burns.
- grasp marks on small children
- unexplained delay in seeking medical treatment or parents/carers who are uninterested or undisturbed by an injury or accident
- family use of different doctors and A&E departments.

### **Recognising signs of Emotional abuse:**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, including domestic violence.

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.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent/carers, e.g., excessive anxiety on the part of either
- indiscriminate attachment or failure to attach
- aggressive behaviour towards others
- scape-goated within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a "loner" – difficulty relating to others
- reverting to younger behaviour

- depression, withdrawal
- fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see the School's Anti-bullying Policy.

### **Recognising signs of 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 (including via the internet). 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 (KCSIE 2023 Part 5)

Children of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate to the pupil's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorders), self-mutilation and suicide attempts
- an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as difficulty walking or sitting, injuries to the genital or anal area, bruising to buttocks, abdomen and thighs,
- urinary infections/sexually transmitted diseases;
- persistent sore throats;

Staff should also be aware of the possibility of sexual exploitation.

### **Recognising signs of 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);
- 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;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or
- they are regularly left alone, or in charge of younger brothers or sisters.
- the child shows significant changes in behaviour, behave aggressively or be disruptive, act out, demand attention and require more discipline than other children.

*Behavioural signs of abuse, neglect and exploitation:*

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

- 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;

Signs in the behaviour of the parent or other responsible adult:

- unrealistic expectations of the child i.e. demands 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.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

### **Specific safeguarding issues**

All staff should have an awareness of safeguarding issues - some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol

abuse, truancy and sexting put children in danger.

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also at <http://www.nspcc.org.uk>. The school subscribes to the Caspar weekly update. Staff can also access broad government guidance on the issues listed below via the GOV.UK website

Non-Governmental Organisation (NGO) advice is also available regarding other safeguarding issues:

- Child abduction and community safety incidents
- Children missing from education – also see Attendance Policy
- Children and the court system
- Children with family members in prison
- child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)
- domestic abuse
- Homelessness
- so-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage
- mental health
- child-on-child abuse including: Nudes/semi-nudes, youth produced sexual imagery
- sexual violence and sexual harassment
- up-skirting
- online behaviour and cybercrime
- private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: child-on-child abuse; sexual violence and sexual harassment; online abuse, including imagery; domestic abuse; parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age-appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

[Young witness booklet for 5 to 11 year olds - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Young witness booklet for 12 to 17 year olds - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

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.

### **Children missing from education**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

A child going missing from school or home is a potential indicator of abuse or neglect including sexual abuse and sexual exploitation. All staff are informed of the separate procedures to be used for searching for, and if necessary, reporting, any pupil missing from school. These procedures have regard to relevant statutory and local authority guidance in respect of School attendance (November 2016); children missing from home or care (January 2014); Children Missing Education (September 2016).

Please see the School's separate Missing Pupil Procedure for further details. These procedures include:

- a) safeguarding responses to children who go missing from education, particularly on repeat occasions, which help identify the risk of abuse and neglect and which help to prevent the risks of the child going missing in future;
- b) the requirement
  - i. to record any incident, the action taken and the reasons given by the pupil for being missing;
  - ii. to notify the local authority when the school is about to remove or add a pupil from or to the school admission register at a non-standard transition point.
  - iii. to make reasonable enquiries to establish the whereabouts of a child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1) (h), namely that the child has been continuously absent from the school for a period of twenty school days or more.

If a pupil who has current involvement with Children's Services is absent from school, the normal procedure of a first day call to the home will be followed. The pupil's social worker must be informed of all absences promptly, and immediately, if no response is received or no adequate or credible reason is given for the absence.

All staff are aware of their roles to protect children from going missing in education.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

In addition the school checks at the beginning of the following term that pupils leaving at non-standard points have actually joined the reported school by following up directly by phone call or email to establish that the leaver has indeed turned up on day one at their intended destination.

When a pupil moves to another school, the DSL must inform the receiving school without delay about child protection records. Within 5 days the original records must be passed on either by hand or sent by Royal Mail Special Delivery Guaranteed or Royal

Mail Signed For post and a receipt obtained at the post office at which the letter with the records is handed in. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.

Unexplainable and/or persistent absences from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Staff are all aware of the School's procedures when a child is absent from school. See also Attendance Policy.

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

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a pupil into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a pupil is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- **Inappropriate relationships:**

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

- **Boyfriend:**

Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

- **Organised exploitation and trafficking:**

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

### **Child Criminal Exploitation (CCE) including gangs and County Lines**

CCE is also a form of abuse and involves taking advantage of an imbalance in power

to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 don't take part in education.
- Children who display inappropriate sexualised behaviour.

Examples of criminal exploitation are:
<ul style="list-style-type: none"><li>• county lines</li><li>• benefit fraud</li><li>• forced theft</li><li>• forced begging</li><li>• cannabis cultivation</li><li>• money mule (where the young person's bank account is used by others for money laundering).</li></ul>
County lines is the most common form of criminal exploitation in Camden and describes when gangs and organised crime groups exploit young people to transport and sell drugs, sometimes across county boundaries but also locally and within the borough. The young people have dedicated mobile phone 'lines' for taking orders for drugs and are used as they are less likely to be stopped by police, allowing adult dealers to avoid the risk of arrest. Indicators include unexplained money, having several mobile phones, frequent calls, being in trouble with the police for possession of drugs, being found in an area to which they have no connection.

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidences. The abuse can be, but is not limited to: psychological, physical, sexual financial and emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Exposure to domestic abuse and/or violence can have a serious, long lasting

emotional and psychological impact on children and have a detrimental long-term impact on their health, well-being, development and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse may also lead to other safeguarding concerns.

### **Extra-familial Harms**

All staff should be aware that safeguarding incidents or behaviours can be associated with factors outside the school and can occur between children outside these environments.

All staff, but especially the DSL (and deputies) should consider whether children are at risk in situations outside their families. Extra familial harm takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children.

The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

### **'Honour based' abuse (HBA)**

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

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

If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **Female Genital Mutilation (FGM)**

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place include knowing both that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school. The child may also talk about a special procedure/ceremony that is going to take place. Indicators that FGM may already have occurred include prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems. Some teachers have described how children find it difficult to sit still and look uncomfortable or may complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

The Serious Crime Act (2015) sets out a duty to all professionals, including teachers, to notify police when they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases to the police will face disciplinary sanctions. Under no circumstances should school staff physically examine pupils. The report should be made immediately. The duty to report should not be transferred to the DSL, however the DSL must be informed and CSCP involved as appropriate.

A teacher is not under this duty if:

- A. s/he has reason to believe that another teacher has already reported the case;
- B. in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). For example, staff may hear about the possibility of FGM happening or having happened to a pupil's family member, e.g. sister/female cousin:
  - A teacher may hear reference to FGM in conversation between pupils;
  - A child may confide that a sister/cousin is to have a 'special procedure' to become a woman;
  - A child may report that their sister/cousin is going out of the country for a prolonged period;

- A child may disclose the worry about a sister/cousin being at risk;
  - Parents may withdraw a child from any learning about FGM.
- C. and/or (c) where the woman is 18 or over.

In all such cases, teachers should follow normal safeguarding procedures and discuss their concerns with the DSL immediately. The duty does not apply to non-teaching staff who should discuss any concerns that a child may be at risk of FGM with their DSL immediately.

### **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. 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.

### **Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator the child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, this can have a lasting impact on childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences can impact on their mental health and education.

Early intervention to identify issues and provide effective support is crucial. The School's role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively.

This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.

- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping pupils to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When School suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs.
2. a plan to set out how the pupil will be supported.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)

- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as natural disasters or terrorist attacks – Where children – experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and antisocial behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem. School and college 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.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or Deputy. Further guidance can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1069688/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069688/Preventing_and_tackling_bullying_advice.pdf)

**Child on Child Abuse, including Bullying and Sexual Violence and Sexual Harassment**

(also see Anti-bullying policy, Behaviour Policy, RSE Policy)

All staff should be aware that safeguarding issues can often manifest themselves via child-on-child abuse. The School has a zero-tolerance approach to such abuse and it will never be accepted or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Staff will always challenge such behaviours.

All staff should recognise the gendered nature of some types of child-on-child abuse (that it is, in certain situations more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase a child's vulnerability to abuse by their peers. Evidence shows girls, children with SEND and LGBT children are at greater risk.

## Children who are lesbian, gay, bisexual, or gender questioning (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder. The Cass review recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

When supporting a gender questioning child, Devonshire House would take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are LGBT or gender questioning, lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available.

All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of child-on-child abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Staff are made aware that child-on-child abuse may happen inside or outside school or online and that even if there are no reports in the school it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other means using technology).
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence and sexual harassment (see below and Part five of KCSIE)
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
- initiation/hazing type violence and rituals. Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

The School is committed to doing all it can to prevent and put a stop to child-on-child abuse in all of its forms. Through safeguarding training and anti-bullying training, staff will be made aware of the harm caused by child-on-child abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and safeguarding procedures as appropriate. This commitment extends to reviewing incidents of child-on-child abuse so as to learn lessons.

Staff should always be clear that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

The School is determined that no kind of bullying or child-on-child abuse will be tolerated by pupils, parents or staff at the School.

The School's Anti-bullying policy can be found on the School intranet and website.

Pupils will be made aware of the harm caused by bullying and other forms of child-on-child abuse, and the procedures the school has in place to minimise the risk of child-on-child abuse, through PSHEE, RSE, tutors and the assembly programme. The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

Staff training will include how to manage a report or disclosure of child-on-child abuse, including child-on-child sexual violence and sexual harassment. Indicators that a child may be being abused or harmed by a peer overlap with other indicators of abuse. The DSL will inform the parents of the pupil making the allegation and explain the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

All School staff, pupils and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures (including, as necessary, the involvement of other agencies

such as the police and CSCP), and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedures in this policy regarding allegations made against staff.

The safeguarding team and the SLT will take all necessary action to ensure victims, perpetrators and any other child(ren) affected by child-on-child abuse receive appropriate support through thorough investigation, appropriate disciplinary, remedial and/or preventative action, detailed record-keeping (on CPOMS) and regular review of any situation in which child-on-child abuse is suspected or known to have taken place, in accordance with procedures laid out in the Anti-bullying Policy; Behaviour, Rewards and Sanctions Policy; Risk Assessment Policy, and this policy. If there is a concern that a child is at risk of serious harm from bullying behaviour or child-on-child abuse, a referral will be made to CSCP and/or the LADO and the School's Child Protection Procedures will be followed; the police will be informed in cases of serious harm.

### **Strategies to reduce the risk of child-on-child abuse**

Preventative strategies for child-on-child abuse are regularly considered. The School has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always reported and dealt with immediately by staff.

There is a strong and positive assembly programme and PHSE and RSE curriculum and pastoral care system, which gives pupils an open forum to talk things through and explore disputes or difficulties. The IT curriculum also teaches pupils about acceptable online behaviour.

### **Prejudiced Behaviour**

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

### **Child-on-child abuse -Sexual Violence and Sexual Harassment**

The school has a zero-tolerance approach to any form of sexual violence or sexual harassment; it is never acceptable and will not be tolerated.

All staff working at DHS have been advised to maintain an attitude of "it could happen here".

Staff have been trained to be aware of and respond to all reports and concerns relating to sexual violence and/or sexual harassment, both online and offline, including those which might be happening outside the school. The DSL will take charge of procedures following a report of sexual violence/sexual harassment. Sexual violence and/or sexual harassment is suspected, reported or disclosed.

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts (upskirting). Dismissing or tolerating such behaviours risks normalising them.

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

**Sexual Harassment:** means '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.

Whilst not intended to be an exhaustive list, 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, such as upskirting (it has to be considered when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure. Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE, paragraph 483.

This will include

- Initial response - considering the needs of both victim(s) and alleged perpetrator(s). The victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered. This however will be balanced against the school's duty and responsibilities to protect

other children and the following factors below:

- The nature of the alleged incident (s), including whether a crime may have been

committed and /or whether Harmful Sexual Behaviour (HSB) has been displayed.

- The ages of children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children – are alleged perpetrators significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the incident a one-off or sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- Has the sexual violence / harassment taken place within an intimate personal relationship?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Any on-going risks to victim, other children, adult students or school staff?
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?

The DSL will also review the following when responding to a report of sexual violence in order to make sure the right procedures are carried out.

- Record Keeping
- Risk Assessment of the disclosure / event.
- Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
- Ongoing response – safeguarding and support for all parties

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police.

The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm.

If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

### **Considering confidentiality and anonymity** Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

The school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

For example, the public task basis may apply, where the overall purpose is to perform

a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Staff MUST seek advice from the DSL (or deputy), who will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and the police.

Rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the DSL (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the child.

### **Anonymity**

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any sanctions required following a report of child-on-child abuse will be determined on a case-by-case basis.

### **Risk assessment**

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

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)

- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the locations safer.

Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe.

### **Appropriate Support for Victim and Perpetrator**

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

This will include pastoral support for both perpetrator and / or victim, through in-house counselling, reflection or behaviour modification support which may also be sought from external specialist agencies.

In all cases the school will monitor the progress of both perpetrator and victim to ensure that this type of behaviour does not occur again.

### **Children with harmful behaviour**

There will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures above. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and CSCP services in accordance with the procedures in this policy.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being "at risk".

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from CSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of CSCP, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

### **E-Safety**

The school adopts a whole school, holistic approach to online safety which

- (a) captures the range and complexity of the risks and of children's experiences of those risks;
- (b) seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and

(c) handles all cases of online harm appropriately and with sensitivity. It recognises that abuse can take place wholly on line and that technology can also be used to facilitate offline abuse

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face- to- face meetings, radicalisation or sexualpredation.

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

- **content:** being exposed to illegal, inappropriate or harmful material  
This includes but is not limited to (a) violent pornography or sexual images of children which affect a child's perception of girls, love and relationships; (b) material promoting harmful behaviours such as self-harm or eating disorders; (c) propaganda or material promoting extremism, radicalisation and/or terrorism; (d) material showing or depicting extreme violence or brutality; and (e) social media such as Facebook and Instagram which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives.
- **contact:** being subjected to harmful online interaction with other users  
This includes but is not limited to (a) cyber-bullying; and (b) contact from individuals seeking to groom children for the purposes of sexual abuse or radicalisation.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.  
This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse children; (b) youth produced sexual imagery.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Having assessed the level and nature of risk posed to our pupils, and bearing in mind the prevalence of online harm and abuse in the UK, we consider the risk of online harm to be material, particularly in relation to: cyber-bullying; harm caused by youth produced sexual imagery, internet pornography or on-line grooming; and harmful material promoting behaviours such as self-harm and eating disorders. The school's Staff Code of Conduct and ICT Acceptable Use Policy explain the responsibilities of staff in relation to keeping children safe online.

The school will do all it reasonably can to limit children's exposure to the above risks when using our own IT systems, by having in place appropriate filters and monitoring systems which are designed to protect children from online abuse without "over blocking" or imposing unreasonable restrictions as to what children can be taught through online education. See also the School's E-Safety Policy, which includes Acceptable Use policies  
Pupil mobile phones are handed in each morning and collected at the end of the day  
Parents, visitors, staff and pupils are not allowed access to the school wireless network system whilst on the premises on their own personal devices and the use of mobile phones is not permitted by any parent or pupil whilst on the school premises.  
The school internet system is fully protected by the use of a filter and monitoring system (see E-Safety policy)

Pupils also receive guidance on safe use of the web (including anti-bullying) through the ICT and PSHEE curricula and in year group assemblies.

Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying policy and procedures.

Pupils are educated about the risk of online harm, including youth produced sexual imagery, and the ways to mitigate those risks in PSHE and Information Technology classes and in assemblies and form groups.

Chat rooms and social networking sites are sources of risk of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home.

The School runs parent evenings to help parents understand the possible risks and actively engages with parents to ensure a joined up approach when responding to cases of harm, and to ensure as far as possible that parents are aware of and understand the risks of it and are able to identify and respond appropriately to cases of online harm.

Regular mention is made in the Newsletter of sources of support for parents and can be found on the school VLE.

Staff receive training every three years on online safety from the NSPCC or similar provider.

Any child may suffer from online harm and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse which can be found at Appendix 1 of the Safeguarding Policy. For further indicators that a child may be suffering from online harm, please see here.

If you suspect that a child may be at risk of or suffering from online harm, follow the procedure set out and discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.

For more information on e-safety see:

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

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

<https://www.educateagainsthate.com/>

[www.saferinternet.org.uk](http://www.saferinternet.org.uk)

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)

<https://webarchive.nationalarchives.gov.uk/ukgwa/20220225162456/https://www.disrespectnobody.co.uk/>

## **Remote Education**

The school is in regular contact with parents and carers.

The school will ensure that those communications will be used to reinforce the importance of children being safe online and enable parents and carers to understand what systems the school uses to filter and monitor online use.

Parents and / or carers will be made aware of what their children are being asked to do

online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

### **Filters and monitoring**

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Governance will do all they can to limit our children's / pupils' exposure to the above risks from the school's IT system.

The designated safeguarding lead takes lead responsibility for understanding the filtering and monitoring systems and processes in place.

### **The sharing of youth produced sexual imagery, nudes/semi-nudes, upskirting, sexting**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Up-skirting is also 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.

Sexting refers to both images and videos where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; and
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

Anyone, of any gender, can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and refer to the DSL as soon as possible.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off.

Staff should not view, copy or print the imagery, nor forward images by email or any other electronic means.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to

believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Services Local Referral, Intervention and Assessment Service Team, or the police as appropriate.

Immediate referral at the initial review stage should be made to Children's Services Local Referral, Intervention and Assessment Service Team/police if:

- the incident involves an adult;
- there is good 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 education needs);
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or is violent;
- the imagery involves sexual acts;
- the imagery involves anyone aged 12 or under; and
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to pupils involved and may decide to respond to the incident without escalation to Children's Services Local Referral, Intervention and Assessment Service Team, or the police.

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our safeguarding procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the School.

The DSL will record all incidents, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

### **Thresholds of Sexual behaviour by children**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other.

Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

**Green behaviours** reflect safe and healthy sexual development.

They are:

- i. Displayed between children or young people of similar age or developmental ability
- ii. Reflective of natural curiosity, experimentation, consensual activities, and positive choices

**Amber behaviours** have the potential to be outside safe and healthy development. They may be:

- i. Unusual for that particular child or young person
- ii. Of potential concern due to age or developmental differences
- iii. Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

**Red behaviours** are outside safe and healthy behaviour. They may be:

- i. Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

## Preventing Radicalisation

The referral procedures set out in this policy also apply where there are concerns about children who may have been drawn into terrorism. In accordance with the Department for Education Statutory Guidance 2015: Prevent Duty, the School recognises its duty to have due regard to the need to prevent pupils from being drawn into terrorism and adopts appropriate protocols to minimise the risk. The DSL (reporting to Governance) is the designated Prevent Duty person responsible for co-ordinating action within the School and liaising with other agencies.

Although the School assesses the risk to be low at present, the School will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with pupils when appropriate in suitable forums, and undertaking Prevent awareness staff training periodically to ensure that staff are able to identify pupils at risk and know how to intervene.

The DSL will also assess and manage appropriately any risks identified in the vicinity of the School, including those posed by any visiting speakers, and will maintain a register of all visiting speakers, who will always be checked as suitable before being permitted to visit the School. The School will work in partnership with the local authority over such matters; the level of risk will determine the most appropriate referral. Further information and guidance on radicalisation is available from the government Channel support programme.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being

drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment.

### **Private Fostering**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Children being privately fostered are required by law to be seen by a social worker. If a member of staff or volunteer becomes aware that a child under the age of 16 (or 18 if disabled), may be in a private fostering arrangement, they should raise this in the first instance with the DSL. The DSL will then notify the Local authority who will check that the arrangements are suitable and safe for the child. For further information about private fostering, visit the London Borough of Camden website.

### **Fabricated Illness**

Fabricated or induced illness is a condition whereby a child has suffered or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means.

Further information may be found at;

[https://www.londonsafeguardingchildrenprocedures.co.uk/fab\\_ind\\_ill.html](https://www.londonsafeguardingchildrenprocedures.co.uk/fab_ind_ill.html)

## Appendix 2

### Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.

The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

### Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act 2010).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK ([www.gov.uk](http://www.gov.uk)), it may also be useful for colleges. For further information

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-guidance>

### Appendix 3

#### Confirmation of receipt of Safeguarding Policies and Training in the Staff Code of Conduct, the School's Whistleblowing Procedures, DSL details, Part one of KCSIE and What to do if you're worried a child is being abused

NEW STAFF

Name: \_\_\_\_\_

Date of joining school: \_\_\_\_/\_\_\_\_/\_\_\_\_ Date of induction: \_\_\_\_/\_\_\_\_/\_\_\_\_

Name and designation of staff member responsible for induction: \_\_\_\_

- I confirm that I have received, read and understand the School's Safeguarding and Child Protection Policy, including the procedure for reporting concerns about a child and the Neutral Notification system.
- I confirm that I have been provided with, have read and understand part one of Keeping Children Safe in Education.
- I confirm that I have read and understand the Staff Code of Conduct, Pupil Behaviour Policies Missing Pupil Procedures and Whistleblowing Code
- I can confirm that I have read and understood What to do if you're worried a child is being abused (March 2015)
- I confirm that I have been made aware of my duty to safeguard and promote children's welfare (see below).
- I confirm that I know the identity and the role of the Designated Safeguarding Lead and deputy and how to contact them.
- All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for children. All school staff should:
  - place the safety and welfare of children above all other considerations
  - treat all members of the school community, including children, parents, colleagues and governors with consideration and respect
  - adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies
  - treat each child as an individual and make adjustments to meet individual need
  - demonstrate a clear understanding of and commitment to non-discriminatory practice
  - recognise the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused
  - understand that school staff are in a position of trust and that sexual relationships with a school pupil constitutes an offence
  - be alert to, and report appropriately, any behaviour that may indicate that a child is at

risk of significant harm

- encourage all children to reach their full potential
- never condone inappropriate behaviour by children or staff
- take responsibility for their own continuing professional development
- refrain from any action that would bring the school into disrepute
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice
- Report, any situation where their behaviour, or the behaviour of another adult towards a pupil, raises concern or has the potential to be misinterpreted so as to raise the concern of others.

Signature:

Date: / /

Please sign and return this form to the Designated Safeguarding Lead:

DSL Signature:

Date: / /

THIS FORM MUST BE RETURNED BY THE DSL TO HR

## Appendix 4

### Early Help provided at Devonshire House School

- Designated protected daily form times and PSHEE when pupils are in contact with a FormTutor, e.g. Registration and Form Time
- Pupils know how to ask for help anonymously or through a trusted adult (Via notice boards, PSHEE lessons)
- PSHEE curriculum explores emotions and strategies to develop positive relationships
- Place2Be counsellor at school to run individual sessions or group Place2Talk sessions each week. Children can self-refer for Place2Talk or be referred by their parent or teacher for an assessment for a weekly Place2Be counselling session (reviewed after 10 sessions).
- Monday morning briefing for all staff allows opportunity for discussion regarding anychild who may be in need of additional support
- Staff meetings allow staff to collate and track information on vulnerable pupils
- Additional support referrals can be suggested by any member of staff and are approvedthrough SLT
- Values of the half term such as Compassion, Tolerance and Empathy are celebrated inassembly and FormTime
- Mental Health Week, Anti-Bullying Week, Safer Internet Day are celebrated through guest speakers and a series of assemblies and follow-up Form Time sessions
- Broad extra-curricular programme (including art, music, drama, sport) to allow pupils plenty of opportunity to build self-esteem, connection and a sense of belonging, explore forms of creative and/or musical therapy, take regular exercise
- PSHEE lessons that provide education on protective factors for strong mental health andself-help
- A Head of Mental Health and a Mental Health and Wellbeing Policy which includesdetail of how the School promotes positive mental health
- A staff working group and a pupil group
- Individual Care Plans formulated in support of pupils in need
- Absence from school is closely monitored and appropriate arrangements made toallow for the continuing education of the pupil at home, where required
- Learning support is provided for pupils with SEN. Pupils may also be referred for assessment by an EducationPsychologist