



# **Child Protection and Safeguarding Policy**

**September 2023**

# Child Protection and Safeguarding policy

<b>Policy to be reviewed annually</b>			
<b>Action</b>	<b>Owner</b>	<b>Date</b>	<b>Completed</b>
Review	Sandrine Paillasse	September 2023	✓
Reported	Safeguarding and Welfare Committee	October 2023	✓
Approved	Board of Governors	November 2023	

<b>To be published on</b>	
School network	✓
School website	✓
ISI portal	✓

## **Accessibility notice**

To enable easier reading, this Policy is available in a larger font upon request

## 1. Key internal contact details

The senior staff listed below have been fully trained in accordance with the requirements of statutory guidance and have the status and authority to take responsibility for child protection and safeguarding matters. The Designated Safeguarding Lead (DSL) will always be a member of the Senior Leadership Team (SLT).

<b>Designated Safeguarding Lead</b>	Ella Schierenberg, Deputy Head Pastoral Ext. 241 <a href="mailto:ella.schierenberg@stchristophers.london">ella.schierenberg@stchristophers.london</a> PREVENT duty lead Looked after children lead
<b>Deputy Designated Safeguarding Leads (DDSLs)</b>	Amy Ullman Ext: 231 <a href="mailto:Amy.ullman@stchristophers.london">Amy.ullman@stchristophers.london</a> James Greene Ext. 232 <a href="mailto:James.greene@stchristophers.london">James.greene@stchristophers.london</a> Stephanie Martineau Ext. 203 <a href="mailto:stephanie.martineau@stchristophers.london">stephanie.martineau@stchristophers.london</a> Jennie McGovern EYFS Ext: 211 <a href="mailto:jennie.mcgovern@stchristophers.london">jennie.mcgovern@stchristophers.london</a>
<b>EYFS Designated Person</b>	Jennie McGovern EYFS Ext: 211 <a href="mailto:jennie.mcgovern@stchristophers.london">jennie.mcgovern@stchristophers.london</a>
<b>Designated Safeguarding Governor</b>	Dr Sarah Kavanaugh <a href="mailto:sarah.kavanaugh@stchristophers.london">sarah.kavanaugh@stchristophers.london</a>
<b>Chair of Governors</b>	Silvia Fiaccavento <a href="mailto:silvia.fiaccavento@stchristophers.london">silvia.fiaccavento@stchristophers.london</a>
<b>Head</b>	Sandrine Paillasse Ext. 215 <a href="mailto:sandrine.paillasse@stchristophers.london">sandrine.paillasse@stchristophers.london</a>
<b>Online Safety Coordinator</b>	Holly Thomas Ext. 207 <a href="mailto:Holly.thomas@stchristophers.london">Holly.thomas@stchristophers.london</a>

## 2. Key external contact details

### 2.1. Local authority child protection contact details

<p><b>Multi Agency Safeguarding Hub (MASH)</b> 020 7974 3317 9am-5pm <a href="mailto:Tracey.murphy@camden.gov.uk">Tracey.murphy@camden.gov.uk</a> is the MASH service manager <a href="mailto:LBCMASHadmin@camden.gov.uk">LBCMASHadmin@camden.gov.uk</a> (PASSWORD PROTECT DOCUMENTS)</p>
<p><b>Emergency Duty Team (Out of hours):</b> Tel: 020 7974 4444</p>
<p><b>Child Protection Lead Officer and Local Authority Designated Officer (LADO):</b> Name: Jacqueline Fearon <a href="mailto:Jacqueline.Fearon@camden.gov.uk">Jacqueline.Fearon@camden.gov.uk</a> Deputy LADO: John Lawrence-Jones Contact details: 020 7974 4556 <a href="mailto:Lado@camden.gov.uk">Lado@camden.gov.uk</a></p>
<p><b>First Stop Early Help:</b> Tel: 020 7974 8791 <a href="http://www.camden.gov.uk/early-help-for-families">www.camden.gov.uk/early-help-for-families</a></p>
<p><b>Camden Safeguarding Lead Officers:</b> Name: Michelle O'Regan (Head of Service – Children in Need) Tel: 020 7974 1905 <a href="mailto:Michelle.O'Regan@camden.gov.uk">Michelle.O'Regan@camden.gov.uk</a> Tracey Murphy (Service manager) Tel: 020 7974 4103 Patricia Williams (Service manager) Tel: 020 7974 1558</p>
<p><b>Camden Children's Contact Service/MASH team:</b> Manager: Jade Green Tel: 020 7974 1553/3317 Fax: 020 7974 3310</p>

## 2.2. Additional contact details

<p><b>Child Abuse Investigation Team</b> (Holborn Police Station):          020 8733 6495/6507          Sapphire Unit Holborn Police Station: 020 8733 6490/6482  <a href="http://www.londonscb.gov.uk">www.londonscb.gov.uk</a></p>
<p><b>Preventing Extremism in Schools and Children's Services</b>          Tel: 020 7340 7264          Email: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>
<p><b>Online Safety Contact Officer:</b>          Jenni Spencer          Tel: 020 7974 2866</p>
<p><b>Prevent Education Officer</b>          Jane Murphy          Tel: 020 7974 1008</p>

## 2.3. Useful contacts

<p><b>NSPCC Whistleblowing Advice Line</b></p>	<p>Weston House          42 Curtain Road          London, EC2A 3NH          Tel: 0800 028 0285          Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<p><b>Disclosure and Barring Service</b></p>	<p>DBS customer services          PO Box 3961          Royal Wootton Bassett, SN4 4HF          Tel: 03000 200 190          Email: <a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a></p>
<p><b>Teaching Regulation Agency</b></p>	<p>Teacher Misconduct          Ground Floor South          Cheylesmore House          5 Quinton Road          Coventry CV1 2WT          Tel: 0207 593 5393          Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>

<b>OFSTED Safeguarding Children</b>	Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm) Email: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>
<b>Independent Schools Inspectorate</b>	Tel: 0207 6000100 Email: <a href="mailto:concerns@isi.net">concerns@isi.net</a>
<b>Support and Advice about Extremism</b>	Department for Education Non-emergency number: 020 7340 7264 Email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>

### 3. Policy scope

- 3.1. This policy applies equally to the Early Years Foundation Stage (EYFS) setting (Reception Class), Key Stage 1 and Key Stage 2 as taught at St Christopher's School. This policy is reviewed annually and upon changes and recommendations, by the Designated Safeguarding Lead (DSL) and in conjunction with the Designated Safeguarding Governor, before it is reviewed by the governing body. The policy is available on the School website or upon request.
- 3.2. For the purposes of this policy, the term "staff" refers to the Head, teachers, assistants, administration personnel, ancillary personnel, maintenance workers and caretakers.

### 4. Policy statement

- 4.1. St Christopher's School is committed to: safeguarding children and promoting their welfare, working to prevent abuse and neglect, protecting children from harm, identifying and reporting concerns about child abuse as required by statutory guidance.
- 4.2. This policy has regard to the following guidance and advice:
- Keeping Children Safe In Education (September 2023) (*KCSIE*)
  - Sharing Nudes and Semi-Nudes: advice for education settings working with children and young people (December 2020)
  - Disqualification under the Childcare Act 2006 (August 2018)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
  - Working Together to Safeguard Children (2018) (*W/T*)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
  - Revised Prevent Duty Guidance for England and Wales (July 2015)
  - The Prevent Duty: Departmental advice for schools and child care providers (June 2015)
  - The use of social media for online radicalisation (July 2015)
  - The UN Convention on the Rights of the Child (1989) Article 19
- 4.3. This policy also takes into account the procedures and practice of the London Borough of Camden as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Partnerships, or LSCP (the three safeguarding partners: local authorities, chief officers of police, and clinical commissioning groups).

4.4. This policy takes into account other associated policies, including: behaviour, online safety, anti-bullying, whistleblowing, safer recruitment, PSHCE, behaviour, the staff code of conduct, physical intervention, first aid, health and safety, acceptable use policy, educational visits, pupil supervision, EYFS, attendance and missing child. It also notes the visiting speaker procedure.

## 5. Policy aims

- 5.1. To inform staff so that they feel confident in identifying the needs of children and any specific harms to their wellbeing and safety
- 5.2. To ensure staff understand the lines of reporting concerns about children or adults working or volunteering in the school, centred around a view that it 'could happen here.' They need to be able to verbalise and rationalise intuitions.
- 5.3. To raise awareness of all school staff of the importance of safeguarding and child protection, and in particular to make clear responsibilities for identifying and reporting actual or suspected abuse. In effect, **safereguarding is 'everyone's responsibility'**;
- 5.4. To ensure pupils, parents, volunteers, prospective employees and visitors are aware that the school takes child protection seriously and will follow school and local authority procedures for identifying and reporting abuse and for dealing with allegations against staff;
- 5.5. To promote effective liaison with other agencies in order to work together for the protection and welfare of all pupils – this includes children's services, the LADO, police and other support agencies such as healthcare;
- 5.6. To support pupils' development in ways which will foster security, confidence and independence;
- 5.7. To take a child-centred and co-ordinated approach by integrating a child safeguarding curriculum within the existing curriculum, allowing for continuity and progress through all the key stages;
- 5.8. To make appropriate links and reference to policies in related areas such as discipline and bullying and prevention of radicalisation.

## 6. Policy application and sharing

- 6.1. The school aims to create an ethos where children and parents feel valued, listened to and are understood. Children are made aware that their happiness and safety are important, and parents informed of this.
- 6.2. The school is committed to ensuring that all staff and volunteers receive training on child protection, including the school's safeguarding policy and associated policies listed above. They are also trained and kept aware of the identity of the DSL and DDSL, given a copy of Part One of KCSIE (2023) complete with Annex A for all leaders and staff in direct contact with pupils. All staff receive formal safeguarding and child protection training (including online safety) at least every two years, as well as regular safeguarding updates particularly noting those published by DfE or the local authority from the DSL. There is a compulsory safeguarding induction (including online safety) for all newly appointed staff and volunteers. The HR Department keeps a record of the training.

6.3. The governors and the school comply fully with safer recruitment systems and procedures and those involved in recruitment of staff are also made aware of the safer recruitment procedures and receive training for this. The school takes due consideration of the Disqualification from Working in Childcare arrangements as outlined in the Childcare Act 2006.

6.4. The school also operates within the child protection policies of Camden Safeguarding Children Partnership as part of the inter-agency safeguarding procedures set up by the three safeguarding partners.

## 7. Policy documents

7.1. The school notes the following documents as critical in its approach to safeguarding and useful sources of information:

Keeping Children Safe in Education, September 2023 including supplementary advice on: Information for all school and college staff	
Pan-London Child Protection Procedures (October 2015)	<a href="http://www.londoncp.co.uk/">http://www.londoncp.co.uk/</a>
Revised Prevent guidance for England and Wales (2019)	<a href="https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales">https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales</a>
Working Together to Safeguard Children, 2018	<a href="http://publishing.service.gov.uk">Working Together to Safeguard Children 2018 (publishing.service.gov.uk)</a>
Part 8 (c ) Independent School Standards Regulations 2014 – active promotion of pupil wellbeing within the meaning of Section 10(2) Children Act 2004(a)	The Government’s aim is for every child, whatever their background or their circumstances, to have the support they need to: <ul style="list-style-type: none"> <li>• Be healthy</li> <li>• Stay safe</li> <li>• Enjoy and achieve through learning</li> <li>• Make a positive contribution to society</li> <li>• Achieve economic well-being</li> </ul>
Children Act 1989 and 2004	Section 11 of the Children Act 2004 creates a duty for the key agencies to work with children to put in place arrangements to make sure that they take account of the need to safeguard and promote the welfare of children when doing their jobs.  The Children Act 1989 Section I (i) specifically identifies: “the child’s welfare shall be .... paramount consideration”  Section 31 (9) as amended by the Adoption and Children Act 2002, regarding “significant



	<p>harm” reads: “Where the question of whether harm suffered by a child is significant turns on the child’s health or development, his health or development shall be compared to that which would be reasonably expected of a similar child”.</p> <p>“ `harm’ ” means ill treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill treatment of another”</p> <p>“ `development’ means physical, intellectual, emotional, social or behavioural development”</p> <p>“ `health’ means physical or mental health: and `ill treatment’ includes emotional abuse, neglect, physical and sexual abuse”</p> <p>(The same definitions of `development’ and `health’ are applicable in Section 17, below)</p> <p>Section 17 (1) places a general duty on the Local Authority:</p> <p>“To safeguard and promote the welfare of children within their area who are in need: and so far as it is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children’s needs”.</p> <p>The term “Children in Need” is defined in the Children Act 1989 (section 17 (10)): A child shall be taken to be in need if -</p> <ul style="list-style-type: none"> <li>a) He/she is unlikely to achieve or maintain or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of service by local authority under this part:</li> <li>b) His/her health or development is likely to be significantly impaired, or further impaired without the provision for him/her of such services:</li> <li>c) He/she is disabled</li> </ul> <p>Investigation – Section 47</p> <p>“Where a local authority (Social Services Department) have reasonable cause to suspect that a child who lives...in their area is suffering or is likely to suffer significant harm the authority shall make or cause to be made such</p>
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	<p>enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare".</p> <p>Children Act 1989 Section 47 (1) (b) Duty to assist:</p> <p>"Where (Social Services) are conducting enquiries (s 47) it shall be the duty of any person (from the Education Authority) to assist them with those enquiries in particular by providing relevant information and advice if called upon by (Social Services) to do so".</p>
Child Care Act 2006	<a href="http://www.legislation.gov.uk/ukpga/2006/21/pdfs/ukpga_20060021_en.pdf">http://www.legislation.gov.uk/ukpga/2006/21/pdfs/ukpga_20060021_en.pdf</a>
Early Years Foundation Stage, 2017	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf</a>
Education Act 2002, Section 175	<a href="http://www.legislation.gov.uk/ukpga/2002/32/pdfs/ukpga_20020032_en.pdf">http://www.legislation.gov.uk/ukpga/2002/32/pdfs/ukpga_20020032_en.pdf</a>
Education and Inspections Act 2006	<a href="http://www.legislation.gov.uk/ukpga/2006/40/pdfs/ukpga_20060040_en.pdf">http://www.legislation.gov.uk/ukpga/2006/40/pdfs/ukpga_20060040_en.pdf</a>
What to do if you are worried a child is being abused 2015	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf</a>
Common Assessment Framework for Camden 2020	<a href="https://www.camden.gov.uk/early-help-for-children-and-families#engw">https://www.camden.gov.uk/early-help-for-children-and-families#engw</a>
Munro Review of Child Protection	<a href="https://www.education.gov.uk/publications/standard/publicationDetail/Page1/CM%208062">https://www.education.gov.uk/publications/standard/publicationDetail/Page1/CM%208062</a>
Education Act 2011	<a href="http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted">http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted</a>
Children Missing in Education, Statutory Guidance for Local Authorities September 2016	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf</a>
Disqualification under the Childcare Act 2006 (September 2018)	<a href="https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006">https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006</a>
What to do if you're worried a child is being abused - WT (March 2015)	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data</a>

	<a href="a/file/419604/What%20to%20do%20if%20you%20re%20worried%20a%20child%20is%20being%20abused.pdf">a/file/419604/What to do if you re worried a child is being abused.pdf</a>
The use of social media for on-line radicalization (July 2015)	<a href="https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation">https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation</a>
Relationships education, relationships and sex education (RSE) and health education (June 2019)	<a href="https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education">https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education</a>
Sexual violence and harassment between children in schools and colleges (September 2021)	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf</a>
Sharing Nudes and Semi-Nudes: advice for education settings working with children and young people.	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible_.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible_.pdf</a>

## 8. Safeguarding and child protection definitions

### 8.1. Safeguarding

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; 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 in order to be safe and happy.

### 8.2. Child protection

Child protection is an area within the broader concept of safeguarding, which entails protecting children from actual abuse or from the risk of abuse.

### 8.3. Victim

The school recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. The School needs to be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

### 8.4. Alleged perpetrator

The school should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for the school to determine, as appropriate, on a case-by-case basis.

## 9. Equality statement

9.1. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. The school is committed to anti-discriminatory practice and recognises children’s diverse circumstances. The school ensures that all children have the same protection, regardless of any barriers they may face.

9.2. The school gives special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are absent from education
- whose parent/carer has expressed an intention to remove them from school to be home educated

9.3. Where a child receiving elective home education has an EHCP, the Local Authority need to review the plan working with the parents and carers.

## **10. Responsibility of all staff, governors and volunteers**

10.1. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education, which is inclusive and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)

10.2. All staff:

Every employee as well as volunteers and governors who assist the school, is under a general legal duty to:

- protect children from abuse
- be able to identify welfare concerns amongst the pupils and to be able to identify pupils who are in need of additional support
- be aware of the school's child protection procedures and to follow them
- know how to access and implement the procedures, independently if necessary
- keep an accurate record of any significant complaint, conversation or event
- report any matters of concern to the DSL
- be aware that technology is a significant component in many safeguarding and wellbeing issues, including but not limited to child sexual exploitation and radicalisation
- be familiar with all the associate policies and procedures listed here:
  - the child protection and safeguarding policy;
  - the role and identity of the DSL and any DDSLs

- the behaviour policy
  - the staff code of conduct
  - the school's whistleblowing procedure
  - the online safety policy
  - the acceptable use policy
  - safeguarding response to children who are absent from education
- Governing body, school leadership team and staff who work directly with children are required to read at least Part 1 of *Keeping Children Safe in Education*.
  - Staff who do not work directly with children will also be required to read Part 1 or Annex A of *KCSIE*.
  - All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.
  - Teaching staff and teaching assistants and those involved in pupil collection/registration should also be familiar with attendance policy and missing child procedure.
  - In addition, all teachers and staff are mandated to notify the DSL of:
    - any conduct that they suspect may be inappropriate (whether in isolation, or as part of a pattern); unsupervised access to a child in changing, sleeping in non-public accommodation at the school or on school trips;
    - the use of sexually inappropriate language, references or jokes;
    - other private communication outside of the school's defined social and social media policies.
  - All staff should 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.

### 10.3. The Safeguarding Team:

- The school's DSL is **Ella Schierenberg** who is a member of the leadership team.
- The deputies are: **Stephanie Martineau, James Greene, Amy Ullman and Jennie McGovern**. They are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.
- The DSL's and DDSL's contact details can be found on the key contacts page at the start of this policy.

#### 10.4. The Role of the DSL:

- The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL will have a good understanding of harmful sexual behaviour (HSB). The DSL's responsibility is to maintain an overview of safeguarding within the school, holding ultimate responsibility for online safety, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL works with the governors to review and update the school's safeguarding policy. Where a pupil leaves the school, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt.
- The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.
- The DSL or a DDSL will always be available to discuss safeguarding concerns. During term time, the DSL and DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements to contact the DSL by mobile phone/email (given on the key contacts page).
- The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*. "NPCC - When to call the police" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do.
- Full details of the DSL's role can be found in Annex 1 of this policy.
- Whilst the governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

#### 10.5. The Governing Board

The Governing Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the head to account for its implementation;
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements, including reasonable adjustments for disabled children

- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person from the DSL

The Governing Body will make sure:

- The Designated Safeguarding Lead has the appropriate status and authority within the school or college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- All governors will read Keeping Children Safe in Education in its entirety.
- Section 15 of this policy has information on how governors are supported to fulfil their role.

## **11. Confidentiality**

- 11.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect and in promoting children's welfare, including in relation to their educational outcomes.
- 11.2. As part of meeting a child's needs, the school recognises the importance of information sharing between practitioners, the 3 safeguarding partners and other agencies as required

- 11.3. The school is aware that among other obligations, the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 11.4. The school acknowledges that timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- 11.5. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- 11.6. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- 11.7. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- 11.8. There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
- 11.9. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- 11.10. The DSL should consider that parents or carers should normally be informed (unless this would put the victim at greater risk).
- 11.11. 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.
- 11.12. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- 11.13. Regarding anonymity, all staff will:
- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.



11.14. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

11.15. Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff in section 36.

## 12. Child protection: types and signs of abuse

12.1. Abuse is a form of maltreatment of a child. Abuse may be caused 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, for example, in relation to the impact on children of all forms of domestic abuse.

12.2. Children may be abused in a family or in an institutional or community setting. When harm is carried out by a person, it may be by those known to them or, more rarely, by others. It may be carried out by adults as well as children.

12.3. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online; this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

12.4. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;

12.5. It also includes:

- child criminal exploitation (CCE); *more details below*
- child sexual exploitation (CSE). *More details below*

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

12.7. All staff should be aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect.

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

Indicators may include:

- unexplained injuries or burns, particularly if they are recurrent

- improbable excuses given to explain injuries
- refusal to discuss injuries
- untreated injuries
- admission of punishment which appears excessive
- fear of parents being contacted
- bald patches
- withdrawal from physical contact
- arms and legs kept covered in hot weather
- fear of returning home
- fear of medical help
- self-destructive tendencies
- aggression towards others
- chronic running away

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

Indicators may include:

- physical, mental and emotional development lags
- behavioural problems
- admission of punishment which appears excessive
- over-reaction to mistakes / low self-esteem
- poor relationships with others
- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking, hair-twisting; thumb-sucking)
- self-mutilation
- fear of parents being contacted
- extreme of passivity or aggression
- drug/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

12.10. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Possible signs of sexual abuse in children under the age of five:

- become insecure or cling to parent in a fearful way
- show extreme fear of a particular person
- cry hysterically when their nappy is changed
- become hysterical when clothing is removed, particularly underclothes
- have some physical signs in the genital or anal areas: smell of semen etc
- have soreness or bleeding in the throat, anal or genital areas
- regress to a much younger behavioural pattern
- behave in a way sexually inappropriate to their age, being obsessed with sexual matters as opposed to normal exploration
- stare blankly, seem unhappy, confused, sad
- become withdrawn. Stop eating, have chronic nightmares, begin wetting again when previously dry
- play out sexual acts in too knowledgeable a way with dolls or other children
- produce drawings of sex organs
- stop enjoying activities with other children, such as stories or games
- seem to be bothered or worried, but won't tell why as if keeping a secret
- change from being happy and active to being withdrawn and fearful
- repeat obscene words or phrases said by the abuser
- say repeatedly that they are bad, dirty or wicked
- become aggressive and hurtful
- act in a sexually inappropriate way towards adults

Possible signs of sexual abuse in children from the ages of five to twelve:

- hint about secrets they cannot tell
- say that a friend has a problem
- ask you if you will keep a secret if they tell you something
- begin lying, stealing, blatantly cheating in the hope of being caught
- have unexplained sources of money
- have terrifying dreams
- start wetting themselves
- exhibit sudden inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- stop enjoying previously liked activities, such as music, sports, art, scouts or guides, going to summer camp, gym club
- be reluctant to undress for gym
- become fearful of or refuse to see certain adults for no apparent reason; show dislike of a particular babysitter, relative or other adult
- act in a sexual way inappropriate to their age
- draw sexually explicit pictures depicting some act of abuse
- seem to be keeping secret something which is worrying them
- have urinary infections, bleeding or soreness in the genital or anal areas
- have soreness or bleeding in the throat

- have chronic ailments, such as stomach pains or headaches
- take over the parent role at home, seem old beyond their years (if a victim of incest)
- develop eating disorders, such as anorexia or bulimia
- become severely depressed. even attempt suicide
- have a poor self-image, self-mutilate
- continually run away
- be suicidal

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

Indicators may include:

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- emaciation
- frequent lateness or non-attendance at school
- untreated medical problems
- destructive tendencies
- low self-esteem
- neurotic behaviour (eg rocking; hair-twisting; thumb-sucking)
- no social relationships
- chronic running away
- compulsive stealing
- scavenging for food or clothes

## 13. Safeguarding issues

13.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude or semi-nude images or videos can be signs that children are at risk.

### 13.2. **Child-on-child abuse**

13.2.1. **All** staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. **All** staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing and responding where they believe a child may be at risk from it.

13.2.2. All staff should understand that even if there are no reports it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if

staff have **any** concerns regarding child-on-child abuse, they should speak to the designated safeguarding lead or deputy.

13.2.3. It is important that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh' or 'part of growing up' can lead to a culture of unacceptable behaviours, an unsafe environment for children, and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudiced-based and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical abuse such as 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, such as rape, assault by penetration and sexual assault; (this may include an online element, which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual or non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### 13.3. **How staff should deal with child-on-child abuse allegations:**

13.3.1. The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

13.3.2. The school recognises that children with special educational needs and disabilities can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for those children.

13.3.3. The school takes the following steps to minimise the risk of child-on-child abuse: by instilling a culture of tolerance and respect, regular PSHCE sessions and circle time, anti-bullying within the curriculum, wellbeing drop-ins, pastoral support and monitoring, and strong communication between home and school. Children can report abuse by approaching a member of staff, but also through form time activities (e.g. I wish my teacher knew) or by placing a note in one of the school's problem solving boxes.

- 13.3.4. Where an issue of child-on-child abuse gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should inform the designated safeguarding lead or a deputy.
- 13.3.5. The designated safeguarding lead will ensure that all allegations of child-on-child abused are recorded on CPOMS, investigated and dealt with.
- 13.3.6. A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the three safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the three safeguarding partners including the police as appropriate.
- 13.3.7. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to local authority children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The school's approach to sexting is that staff will ensure they do not view any images themselves/seek support from the DSL in the event an allegation is made.
- 13.3.8. In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims and perpetrators will be supported through a programme of pastoral care and support from external agencies will be sought, as appropriate.
- 13.3.9. Where consensual and non-consensual sharing of nude and semi-nude images and/or videos is reported, the school will follow the Searching, Screening and Confiscation policy.
- 13.3.10. Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

## **14. Sexual Violence/Harassment Between Children**

- 14.1. When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- the victim;
  - the alleged perpetrator; and
  - the other children (and, if appropriate, staff) at the school.

- 14.2. Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.
- 14.3. It is important that the alleged perpetrator(s) be given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them.

## **15. Children and the Court System**

- 15.1. 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.
- 15.2. 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.
- 15.3. 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.

## **16. Children who are absent from education**

- 16.1. All staff should be aware that children going missing, particularly on repeat occasions and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding issues, including neglect, child sexual abuse and child criminal exploitation (particularly county lines)/It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage.
- 16.2. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (e.g. Child in Need or Child Protection Plan), where being absent from education may increase known safeguarding risks within the family or in the community. It is important that staff are aware of the school's unauthorised absence and children who are absent from education procedures.

## **17. Children with Family Members in Prison**

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

## **18. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- 18.1. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

### **18.2. Child Criminal Exploitation (CCE)**

18.2.1. Some specific form of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening / committing serious violence to others.

18.2.2. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

18.2.3. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

18.2.4. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

18.3.1. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.



18.3.2. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

18.3.3. CSE can affect any child who has been coerced into engaging in sexual activities. Some children may not realise they are being exploited; for example they believe they are in a genuine romantic relationship

18.3.4. Some of the following can be indicators of both CCE and CSE. All staff should be aware of the associated risks and understand the measures in place to manage situation where children:

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

18.3.5. Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

18.3.6. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

18.3.7. CSE is a form of child abuse that is often hidden from sight, difficult to identify, and harder still to stop. Sexual exploitation may take one of the following forms, but the model of exploitation may change over time:

- *Inappropriate relationships* where the young person enters a relationship with an older partner who exerts a great deal of influence and control over them due to an imbalance of power.
- *Peer exploitation* where young person by another young person with whom they have a relationship and who subsequently coerces them into sexual activity with their friends.
- *Organised exploitation*: This involves networks of perpetrators grooming young people for coercion into sexual activity with different people and perhaps using the victims to recruit others.

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

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections or become pregnant.

18.3.9. The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners. **If you believe a child is in immediate danger, call the police on 999.** If you would like to report any concerns, contact Crimestoppers on 0800 555 111, or The NSPCC Child protection helpline gives information, advice and counselling to anyone worried about a child. Tel: 0808 800 5000.

## 19. County Lines

- 19.1. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".
- 19.2. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 19.3. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- 19.4. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 19.5. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.
- 19.6. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

## 20. Domestic Abuse

- 20.1. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or 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). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.
- 20.2. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.
- 20.3. Young people living with domestic or sexual violence may be at risk. **English National Domestic Violence Helpline:** 0808 2000 247  
[www.nationaldomesticviolencehelpline.org.uk](http://www.nationaldomesticviolencehelpline.org.uk)

## 21. Homelessness

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

## 22. So-called Honour-based Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

- 22.1. This encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing.
- 22.2. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.
- 22.3. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is a cultural practice that involves a procedure to remove part or all of a young girl's genital organs. UK law forbids this practice, which can be found mainly among communities from sub-Saharan Africa, the Middle East and Asia. The average age tends to be 10-12 years. Staff should be aware of family plans to take girls out of the UK for an unexplained, prolonged period.
- 22.4. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:
- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
  - A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
  - There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
  - A pupil is reluctant to undergo medical examination.
- 22.5. **What staff should do if they have a concern that FGM has taken place or a pupil may be at risk:**
- 22.5.1. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

22.5.2. Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve local authority children's social care as appropriate.

22.5.3. If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Local Authority Children's Social Care. If in any doubt, staff should speak to the DSL. Staff should also contact the FGM helpline on 0800 028 3550 or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

## 23. Forced marriage

23.1. 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.

23.2. 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 perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

23.3. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 75-80 of the multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmunit@fco.gov.uk](mailto:fmunit@fco.gov.uk).

23.4. In addition, since February 2023, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applied to non-binding, unofficial 'marriages' as well as legal marriages.

## 24. Preventing Radicalisation, the Prevent Duty and Channel

24.1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

24.2. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

24.3. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through

many different methods (such as social media or the internet) and settings (such as within the home).

24.4. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

24.5. **What staff should do if a child is seen as susceptible to radicalisation:**

24.5.1. Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to local authority children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 immediately as well as inform MASH and the DSL.

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

## 25. Upskirting

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

## 26. Mental Health

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

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

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

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

26.5. The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (July 2017):  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

26.6. **What staff should do if a child requires mental health support:**

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

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

## **27. Special Educational Needs and/or Disabilities (SEND) or health issues**

27.1. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

27.2. Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

27.3. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours in school, or the consequences of doing so.

27.4. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the Learning Enrichment Coordinator.

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

- 27.6. The SEND Code of Practice is a source of information and support is available from specialist organisations, including SENDIASS.

## **28. Serious violence**

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

## **29. Children who are lesbian, gay, bi or trans (LGBT)**

- 29.1. 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.
- 29.2. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.
- 29.3. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum.

## **30. Contextual safeguarding**

- 30.1. 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 (and DDSLs) should be considering the context within which such incidents and/or behaviours occur.
- 30.2. This is known as contextual safeguarding, which 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. The school needs to provide as much information as possible as part of the referral process to local authority children's social care.
- 30.3. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple

harms including (but not limited to) sexual abuse (including harassment and exploitation), criminal exploitation, serious youth violence, county lines and radicalisation.

#### 30.4. **Contextual safeguarding issues the school is particularly alert to:**

30.4.1. Proximity to Kings Cross station and other routes out of London, making **county lines** more of a risk to pupils in our community. This is when vulnerable children are made to carry drugs along train lines out of the city.

30.4.2. Girls are often supported **by nannies rather than parents** outside of school hours.

30.4.3. **Gang culture** - there are supposedly numerous gangs that operate in the area.

30.4.4. Links to **senior school children**. It is worth remembering that our girls do have links to numerous senior school children in the local area who will have their own range of, often more complex, issues e.g. self-harm, social networking etc. Girls may be exposed to matters which they may struggle with socially and emotionally.

30.4.5. **Homelessness in the local area** can expose pupils to social issues.

30.4.6. There are some local hospitals meaning girls may come into contact **with vulnerable patients**. This can have an emotional impact on our pupils.

30.4.7. There are **some busy roads and train tracks** in the local area, and there has been a recent child fatality on a main road.

30.4.8. **Domestic abuse, drug/alcohol issues and mental health issues** are reported as very high among households with children in the Camden area.

## 31. Use of school premises for non-school activities

31.1. Where the school rents out school facilities / premises to organisations or individuals (for examples summer camp providers, service providers to run wrap-around care or co-curricular activities), the school should ensure that appropriate arrangements are in place to keep children safe.

31.2. Where services are provided separately by another body, the school should seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place. This applies regardless of whether the children who attend any of these services or activities are children on the school roll.

31.3. Should the School receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for the children, the School's safeguarding policies and procedures will be followed, as with any safeguarding allegation, including informing the LADO.

## 32. Remote education

32.1. The Department for Education have provided advice to support schools to help keep pupils, students and staff safe whilst learning remotely, safeguarding in schools, colleges and



other providers and safeguarding and remote education. The NSPCC also provide helpful advice.

- 32.2. In such situations, the school will aim to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be 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 their child is going to be interacting with online.

### **33. Concerns about a child**

- 33.1. The school has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.
- 33.2. Parents are encouraged to raise any concerns directly with the school, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the Independent Schools Inspectorate (ISI) directly if they wish.
- 33.3. The school has arrangements for listening to children and providing early help. Details of these arrangements are in the school's wellbeing policy.
- 33.4. Concerns about a child may arise from:
- Observation of the child's behaviour or appearance.
  - Things the child has said.
  - A third party (another pupil, parent or guardian) expresses concern.
  - Receipt of an anonymous allegation.
- 33.5. **Procedure for dealing with concerns about a child: logs of concern & MASH**
- 33.5.1. If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.
- 33.5.2. The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the DSL.
- 33.5.3. During a conversation when a child makes a disclosure, all staff should:
- allow them to speak freely
  - listen carefully
  - avoid asking leading questions
  - reassure the individual that the allegation/complaint will be taken seriously

- remain calm and collected – the pupil may stop talking otherwise
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken

33.5.4. If as a result of the conversation staff feel distressed, they should seek support from the DSL or another member of the SLT in the first instance.

33.5.5. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

33.5.6. All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing (a log of concern): preferably on CPOMS or on a paper/electronic log of concern sheet which will be uploaded to CPOMS by the DSL or DDSL.

33.5.7. The record should include:

- the date, time and place of the conversation/observation
- detail of what was said/seen and done by whom and in whose presence.
- the full name of the member of staff and their position, the full names of any pupils or other adults included in the concern (if known).
- When the incident took place and where
- Whether the child wishes their parents (or legal guardians) to be informed
- The child's views on speaking to anyone else associated with the incident e.g. peers
- Details may also include any concerns about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of school.
- A body map may be attached to provide additional detail of any physical mark(s).
- Details of the action taken by the member of staff.

33.5.8. The member of staff should ask open questions and not leading questions; listen carefully and keep an open mind; not take a decision as to whether or not the alleged abuse or neglect has taken place. Any other evidence, such as written notes, items of clothing or mobile phone messages should be given to the DSL.

33.5.9. The record should be uploaded on CPOMS or given to the DSL in person within 24 hours (or urgently if there is an immediate risk or signs of actual harm). In an emergency, the DSL or a DDSL must always be alerted immediately (see procedure below).

33.5.10. Where at all possible, a signature or electronic signature should be given. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or the deputies).

33.5.11. Where there is a safeguarding concern, the school will ensure the pupil's wishes and feelings are taken into account when determining what action to take and

what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School operates its processes with the best interests of the pupil at their heart.

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

33.5.13. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

33.5.14. If a child's situation does not appear to be improving, the DSL should press local authority children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and local authority children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

33.5.15. Contact details for a non-immediate referral:

These are made by the DSL way of an e-CAF referral to the Family Support Social Worker (FSSW) MASH team (using the link: <https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw>).

### 33.6. **What staff should do if a child is in danger or at risk of harm:**

33.6.1. If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to local authority children's social care (MASH) and/or the police. This can be done with the support of the DSL team, or in their absence, by any member of staff.

33.6.2. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk.

33.6.3. Parental consent is not needed for referrals to statutory agencies such as the police and local authority children's social care.

33.6.4. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

33.6.5. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and local authority children's social care as appropriate.

33.6.6. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should take immediate action and not stop to write a referral if it in any way hinders support for the child, making a written referral as soon as possible afterwards.

33.6.7. Contact details for an immediate referral:

**Multi Agency Safeguarding Hub (MASH): 020 7974 3317 9am-5pm**

LBCMASHadmin@camden.gov.uk / [LBCMASHadmin@camden.gov.uk.cjsm.net](mailto:LBCMASHadmin@camden.gov.uk.cjsm.net) (secure email)

**LADO Name: Jacqueline Fearon**

**Deputy LADO: John Lawrence-Jones**

**Contact details: 020 7974 4556**

**Emergency Duty Team (Out of hours):**

Tel: 020 7974 4444

**The Police**

999

- 33.7. Following a phone referral, the DSL will complete an e-CAF referral to the FSSW MASH team (using the link: <https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw>).

## 34. Early help

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

- 34.2. 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 additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing alcohol or any other drugs themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is experiencing, or is at risk of experiencing family ostracism
- is a privately fostered child.

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

34.4. The DSL will refer to Camden's thresholds and eligibility criteria ([Safeguarding children - Camden Council](#)) to help make decisions on the child's level of need and the appropriate service to refer on for services. (This is in accordance with agreed inter-agency procedures set out in Pan-London policies).

34.5. Referral for early help services procedure:

34.5.1. These are made by way of an e-CAF referral to Camden's Early Help/CAF team for children with low-level needs who may need extra services which cannot be provided by the school to help them achieve good outcomes: <https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw>

## **35. Child requiring a social worker (children in need and child protections plans)**

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

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

35.3. Referral for a social work service:

35.3.1. These will be made by way of an e-CAF referral (<https://www.camden.gov.uk/early-help-for-children-and-families?inheritRedirect=true#engw>) to the FSSW MASH team for children with medium level needs who are likely to be assessed as being a child in need under section 17 of the Children Act 1989 (services to Children in Need as defined by the Children Act 1989).

## **36. Concerns or allegations about a member of staff/volunteer (including supply staff, volunteers, contractors, the Head and Governors)**

36.1. In any allegation against a member of staff the welfare of the child is paramount; staff are responsible for their own actions and behaviour and should avoid any contact that would lead any reasonable person to question their motivation and intentions.

36.2. Teachers are vulnerable to accusations of abuse as they come into contact with children in a variety of situations including the wider caring role. The staff code of conduct is important in helping staff to understand risks and not to place themselves in vulnerable situations. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

- 36.3. The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers, the Head and governors) are explained in full in the school's staff code of conduct whistleblowing policy, and elaborated upon below.
- 36.4. If staff have safeguarding concerns about another staff member (or adult listed above) posing a risk of harm to children, then this should be referred immediately to the Head without delay. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of concerns or allegations of abuse being made against the Head, the matter should be directly handed to the designated officer(s) at the London Borough of Camden (LADO).
- 36.5. If staff have a safeguarding concern or an allegation about another member of staff or other adult that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy, found in the school staff code of conduct.
- 36.6. If a child makes an allegation of abuse staff must also make a detailed, dated record of the conversation including:
- 36.6.1. the date, time, and place of the conversation/observation
  - 36.6.2. detail of what was said/seen and done by whom and in whose presence.
  - 36.6.3. the full name of the member of staff and their position, the full names of any pupils or other adults included in the concern (if known).
  - 36.6.4. When the incident took place and where
  - 36.6.5. Whether the child wishes their parents (or legal guardians) to be informed
  - 36.6.6. The child's views on speaking to anyone else associated with the incident e.g. peers
  - 36.6.7. Details may also include any concerns about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of school.
  - 36.6.8. A body map may be attached to provide additional detail of any physical mark(s).
  - 36.6.9. Details of the action taken by the member of staff at the point of disclosure.
- 36.7. The member of staff should ask open questions and not leading questions; listen carefully and keep an open mind; not take a decision as to whether or not the alleged abuse or neglect has taken place. Any other evidence, such as written notes, items of clothing or mobile phone messages should be given to the Head/Chair of governors.
- 36.8. The record should be given to the Head/Chair of governors in person immediately.
- 36.9. Where at all possible, a signature or electronic signature should be given.
- 36.10. Staff should not promise confidentiality.

36.11. Contact details for an immediate referral:

<b>Chair of Governors</b>	Silvia Fiaccavento <a href="mailto:silvia.fiaccavento@stchristophers.london">silvia.fiaccavento@stchristophers.london</a>
<b>Head</b>	Sandrine Paillasse Ext. 215 <a href="mailto:sandrine.paillasse@stchristophers.london">sandrine.paillasse@stchristophers.london</a>

**LADO, Multi Agency Safeguarding Hub (MASH): 020 7974 3317 9am-5pm**

[LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)

36.12. In the event of an allegation being made against a member of staff, the Head will immediately contact the Local Authority Designated Officer (LADO) for advice. If an allegation is made against anyone working with children in the school, the school should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the 'designated officer' on a no-names basis.

36.13. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. If an allegation is reported to the DSL, the DSL will inform the Head without delay. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and designated officer.

36.14. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the police immediately).

36.15. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the police and/or local authority children's social care.

36.16. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by local authority children's social care or the police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

36.17. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place

until the allegation is resolved. The case manager will give due weight to the views of the designated officer, WT and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

- 36.18. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from local authority children's social care or the police.
- 36.19. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services.
- 36.20. The school has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.
- 36.21. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 36.22. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future.
- 36.23. The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.
- 36.24. Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA)). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.
- 36.25. Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.
- 36.26. All allegations, including those appearing not to be serious will be followed up, taken seriously and examined objectively; parents of the child or children involved will be told about



the allegation as soon as possible and kept informed of developments and outcomes including the outcome of any disciplinary hearing.

- 36.27. In accordance with KCSIE, if the allegation is about the safeguarding of a child, the Head will also act as the DSL and take any appropriate action.
- 36.28. The accused member of staff will be informed as soon as possible after the LADO has been consulted and then be kept informed of the progress of the case. If the person is suspended, he or she will be kept informed of developments at school; If there is an internal school investigation and the allegation does not involve a possible criminal offence, the investigation should be completed within 10 working days and a decision made whether or not to take disciplinary action should be made within a further 2 working days.
- 36.29. From 1 October 2012, there have been restrictions on the reporting or publishing of allegations against teachers. Every effort must be made to maintain confidentiality and to guard against unwanted publicity. The school is under a duty to consider making a referral to the Teaching Regulation Agency [formerly the National College for Teaching and Leadership (NCTL)] where a teacher has been dismissed for “unacceptable professional conduct”, as a prohibition order may be appropriate. Further guidance is published on the GOV.UK website. If a referral has been made to the DBS, a second referral must be made to the TRA.
- 36.30. If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether any improvements can be made to the school’s procedures and practice to help prevent similar events in the future.
- 36.31. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (And if they have been involved the LADO) should consider the facts and determine whether any lessons can be learnt and if improvements can be made.
- 36.32. **All staff should** work, and be seen to work, in an open way:
- 36.32.1. discuss and/or take advice promptly from their line managers or another senior member of staff over any incident that may give rise to concern.
  - 36.32.2. keep records of any such incident and of decisions made or further actions agreed, in accordance with school policy for keeping and maintaining records.
  - 36.32.3. adhere to the Staff Code of Conduct.
  - 36.32.4. apply the same professional standards regardless of personal characteristics, including for example gender or sexuality.
  - 36.32.5. be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
  - 36.32.6. read and understand the Whistleblowing Policy and feel able to raise concerns internally. If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line given in the contacts’ section of this policy.

- 36.32.7. understand that effective safeguarding is 'everyone's responsibility'.
  - 36.32.8. avoid physical contact with children as far as is reasonably possible.
  - 36.32.9.
  - 36.32.10. if staff have to have physical contact with a child, they must make sure that doors are open, and others are about.
  - 36.32.11. distance themselves kindly if children stroke, hug or touch, and help them to learn what is and is not appropriate towards adults outside the family.
  - 36.32.12. never administer corporal punishment.
  - 36.32.13.
  - 36.32.14. young children may need reassurance or comfort. Staff may give this if appropriate but be aware of the guidelines above and below.
  - 36.32.15. report any issues or concerns to the DSL about any situation where they feel any of the above points have been compromised or they feel vulnerable to accusations.
- 36.33. Additionally on residential field trips (see also Educational Visits Policy), staff should:
- 36.33.1. Never take a child into their room.
  - 36.33.2. Wake up another adult at night if a child takes more than a few minutes to settle.
  - 36.33.3. Keep careful records of medical aid administered.
  - 36.33.4. Keep records of any changes to accommodation arrangement.
  - 36.33.5. Be careful when entering dormitories, shower rooms and bathrooms.
  - 36.33.6. Hair drying using an electric dryer should be done by an adult in a central public place with another adult present. Staff should ask the child if they may wet/dry her hair and avoid touching her head.
  - 36.33.7. Sun cream should be applied by child.
- 36.34. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO.
- 36.35. **Further arrangements for dealing with safeguarding concerns or allegations of abuse about supply teachers:**
- 36.35.1. 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 should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

- 36.35.2. 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, or redeploy them to another part of the school, whilst they carry out their investigation.
- 36.35.3. The school will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation.
- 36.35.4. When using an agency, the school should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

## **37. Safer recruitment**

- 37.1. The school is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, volunteers and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.
- 37.2. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the school may undertake an online update check through the DBS Update Service.
- 37.3. Full details of the School's safer recruitment procedures for checking the suitability of staff, governors and volunteers to work with children and young people is set out in the school's safer recruitment policy.
- 37.4. The school's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the school's visiting speaker procedures.
- 37.5. The school will report to the Disclosure & Barring Service (DBS), within one month of leaving the school, any person (whether employed, contracted, a volunteer or a student), whose services are no longer used because they are considered unsuitable to work with children. The DBS referral address is: PO Box 181, Darlington DL1 9FA (tel. 0300 123 1111). It is an offence not to report such cases. See Safer Recruitment Policy for further information.

## 38. Procedure for staff to raise concerns about safeguarding practices at the school

- 38.1. The school aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding systems, these should be raised in accordance with the school's low-level concerns, found in the staff code of conduct, or the whistleblowing procedures, found in the whistleblowing policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.
- 38.2. **On-going vigilance:** Good safeguarding requires a continuing commitment from the Governing Body and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequentially enshrined in the School's ethos.
- 38.3. To support this, it is important that school leaders create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. It is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member. This can assist the School to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care
- 38.4. **What staff should do if they have concerns about safeguarding practices in the school:**
- 38.4.1. If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the key contacts page at the start of this policy.

## 39. Training

- 39.1. Induction and training are in line with advice from the three safeguarding partners.
- 39.2. **All new staff will be provided with induction training that includes:**
- the safeguarding and child protection policy;
  - the role and identity of the DSL(s) and any DDSLs
  - the behaviour policy
  - the staff code of conduct
  - the school's whistleblowing procedure
  - the online safety policy
  - the acceptable use policy
  - a copy of part one of KCSIE
  - school leaders and staff who work directly with children will also be required to read Annex A of KCSIE

- Teaching staff and teaching assistants will also be given the attendance policy and missing child procedure.
- 39.3. Copies of the above documents are provided to all staff during induction. All other key policies associated with safeguarding are shared via the staff handbook.
- 39.4. **Temporary staff, visitors and volunteers are provided with:**
- The behaviour policy (for visitors) – visitors
  - The safeguarding and child protection handout
  - the role and identity of the DSL(s) and any DDSLs
  - the acceptable use policy
  - the attendance policy and missing child procedure (all those involved in registration and collection of pupils)
- 39.5. **All staff are also required to:**
- 39.5.1. Read Part one of KCSIE and confirm that they have done so. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via training.
- 39.5.2. Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by assessment at the end of training, ongoing monitoring by the DSL and regular quizzes.
- 39.5.3. Receive training in safeguarding and child protection regularly, in line with advice from the LSCP. Training will include online safety and harmful sexual behaviours (including child-on-child, sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- 39.5.4. Undertake regular updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via regular bulletins.
- 39.6. **DSL and DDSLs**
- 39.6.1. The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the LSCP's approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of KCSIE.
- 39.6.2. In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.
- 39.6.3. The DDSLs are trained to the same level as the DSL.

## 39.7. **Governors**

39.7.1. The named governor will determine appropriate training (in liaison with the DSL) for the governing body. The principle of regular updating will prevail. The governing body must ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

39.7.2. Dr Sarah Kavanaugh is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. She is a member of the governing body.

39.7.3. The school considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is carried out by means of an audit and a report to the governing body. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

39.7.4. If there has been a substantiated allegation against a member of staff, the school will work with the LADO 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.

## **40. The school's arrangements to fulfil other safeguarding responsibilities**

### 40.1. **Teaching children how to keep safe**

40.1.1. Effective education should be tailored to the needs of the children (including if they are victims of abuse). The school plays an important role in preventative education and teaching children and young people values and standards.

40.1.2. This approach will be underpinned by policies, procedures, pastoral support and evidenced based curriculum. This requires a substantial joining up of curriculum and pastoral work with a strong cultural and procedural backdrop and stronger terms by which to regulate this practice.

40.1.3. An effective safeguarding curriculum that teaches in an age-appropriate way is a key component in the whole school approach.

### 40.2. **Personal Social Health and Citizenship Education (PSHCE)**

40.2.1. The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHCE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation.

40.2.2. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social

media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

40.2.3. The school will aim to ensure that curriculum development meets the following objectives (these are often met through the PSHCE curriculum):

- Developing pupils' self-esteem;
- Developing communication skills;
- Informing about all aspects of risk;
- Developing strategies for self-protection, including the safe use of the internet and electronic systems;
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and children/adolescents;
- Developing non-abusive behaviour between pupils;
- Actively promoting the rule of law, democracy and tolerance (Fundamental British values).

### 40.3. **Online Safety**

40.3.1. The responsibility across the school (including EYFS) for online safety is held by the online safety coordinator, who works in liaison with the DSL who holds the ultimate and overall responsibility for this area.

40.3.2. The school recognises the importance of safeguarding children from potentially harmful and inappropriate online material; technology is a significant component in many safeguarding and wellbeing issues.

40.3.3. To address this, the school aims to:

- have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (e.g. referred to as 'mobile phones' in this policy)
- set clear guidelines for the use of mobile phones for the whole school community
- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

#### 40.3.4. **The 4 key categories of risk**

The school's approach to online safety is based on addressing the following categories of risk:

- 40.3.4.1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- 40.3.4.2. **Contact** – being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- 40.3.4.3. **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

40.3.4.4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

**40.3.5. To meet our aims and address the risks above the school:**

40.3.5.1. educates pupils about online safety as part of Digital Technology and the wider curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

40.3.6. trains staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members receive refresher training at least once each academic year

40.3.7. educates parents/carers about online safety via communications sent directly to them and during parents' evenings. The school also shares clear procedures with them so they know how to raise concerns about online safety

40.3.8. makes sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

40.3.8.1. All staff, including EYFS, must have their personal devices switched off or on silent when supervising children (including on school trips) and mobile phones should not be visible in the classroom (see Online Safety Policy and Staff code of conduct).

40.3.8.2. Personal cameras must not be used at any time and the class cameras must only to be used for school purposes and photographs uploaded on Vidigami and then deleted as soon as is possible and always in accordance with GDPR regulations.

40.3.8.3. parents are not permitted to use their mobile phones or camera in or around the school without prior approval from the Head

40.3.9. makes all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology. Parents are encouraged to follow these same principles at home.

40.3.10. explains the sanctions the school will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

40.3.11. makes sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation



- 40.3.12. puts in place robust filtering and monitoring systems (and review it at least annually) to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems including pupils' devices, effectively blocking harmful and inappropriate content without unreasonably impacting teaching and learning
- 40.3.13. carries out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the school community
- 40.3.14. For comprehensive details about the school's policy on online safety and the use of mobile phones, please refer to the online safety policy, which can be found on the school's website. The online safety policy provides additional detail on how the school safeguards children from harm online. It also details information around pupils accessing 3G, 4G and 5G technology on School premises.
- 40.3.15. The school uses appropriate category filters and monitoring to prevent children viewing unsuitable material alongside staff supervision. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.
- 40.3.16. The online safety coordinator and the DSL have the responsibilities to manage the school's filtering and monitoring systems, with support from the IT helpdesk as necessary.
- 40.3.17. The DSL and DDSLs have effective monitoring strategies in place that meet their safeguarding needs; they receive daily filtering alert reports, and instant alerts for critical risks such as suicide.
- 40.3.18. The Senior Leadership Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively; they know how to escalate concerns when identified.
- 40.3.19. The Governing body should consider the number of and age range of the pupils, those who are potentially at greater risk of harm and how often they access the IT systems with the proportionality of costs versus safeguarding risks.

#### 40.4. **Relationships and Sex Education (RSE)**

- 40.4.1. RSE is compulsory although the school has flexibility to decide how it discharges its duties. The school has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE. Further details can be found in the school's PSHCE policy.

#### 40.5. **Supporting All Pupils: SEND Children**

- 40.5.1. The DSL will work with the learning enrichment coordinator to identify pupils with particular communication needs and to ensure clear guidance is available for staff in relation to their responsibilities when working with children and teaching them how to stay safe.

40.5.2. SEND children may face additional risks, e.g. to child-on-child abuse, so care will be taken to ensure communication barriers and difficulties are overcome, changes in mood, behaviour or injury are investigated thoroughly and indications of bullying are taken seriously.

40.5.3. The DSL will work with the learning enrichment coordinator to ensure there is clear training and support for staff working with pupils with intimate care needs.

#### 40.6. **Supporting All Pupils Looked After Children (LAC) and Post-LAC**

40.6.1. The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority, and who were previously LAC (Post-LAC), i.e. those who are now adopted or who have returned to live with their parents/carers.

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

#### 40.7. **Supporting All Pupils: Privately Fostered Children**

40.7.1. Privately fostered children are those aged up to 16 who are cared for by someone who is **not** a parent or close family member, and where the care arrangement will last more than 28 days.

40.7.2. Private fostering is a private arrangement between parents and the carer and normally happens when parents are working away or a child is sent to live in the UK by relatives. All private fostering must be reported to Camden fostering team 020 7974 6783, who have a duty to visit the child to safeguard their welfare.

#### 40.8. **Supporting All Pupils: Young Carers**

40.8.1. Young carers are children who frequently take on responsibility for looking after parents or younger siblings, carrying out household tasks beyond what would normally be expected for a child of their age. This may be due to disability or poor health.

40.8.2. If schools have a concern about a pupil they believe to be a young carer, they can contact Family Action on 020 7272 6933 for advice, and they can refer the pupil on for services and support.

### **41. Arrangements for Visiting Speakers**

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

41.2. The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting

requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

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

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

## **42. Arrangements for Children Educated Off-Site (Excluding trips)**

42.1. On occasions, children may need to be educated off-site, for instance to attend drama exams, or offsite performances. When pupils are under the care/supervision of the school, the educational visits policy will be applied regardless of how many pupils are offsite in a particular instance.

## **43. Early years provision safeguarding arrangements**

### **43.1. Disqualification from working in childcare**

43.1.1. Where staff work in, or are involved in the management of, the school's early years or provision of care of pupils under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the school's recruitment and selection policy.

43.1.2. The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register (SCR). This includes the date disqualification checks were completed.

43.1.3. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

### **43.2. DSL for the EYFS**

43.2.1. The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Jennie McGovern.

### **43.3. Duty to notify Ofsted**

43.3.1. The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where

childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

43.3.2. The school will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

## **ANNEX 1: ROLE OF THE DESIGNATED SAFEGUARDING LEAD**

- 1.** Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school senior leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.
- 2.** The designated safeguarding lead should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.
- 3.** The DSL will have a good understanding of harmful sexual behaviour. They will discuss the local response to sexual violence and sexual harassment with the police and local authority children's social care colleagues to prepare the school's policies.
- 4.** The DSL will be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- 5.** The DSL will be aware that all children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

### **Deputy designated safeguarding leads**

- 6.** Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, and this lead responsibility should not be delegated.

### **Availability**

- 7.** During term time the designated safeguarding lead (or a deputy) should always be available (during school hours, 8:30 to 5pm) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Zoom or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.