



**HURLINGHAM  
SCHOOL**

# **Safeguarding and Child Protection Policy**

This policy is made available to all parents, prospective parents, staff and prospective employees of Hurlingham School on our website, and a hard copy can also be viewed at our School Office.

This policy applies to all activities of Hurlingham School, including the Early Years Foundation Stage (EYFS) Nursery and Reception pupils.

**This Policy should be viewed in conjunction with the COVID-19 Pandemic Risk Assessment, Pandemic Plan and Pandemic Policy.**

**All staff are required to read this policy carefully and to be aware of their role in these processes.**

All new staff will have the opportunity to discuss safeguarding requirements and this policy during their induction process.

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## Important Notice

### SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child

Staff members must raise any safeguarding concerns with the appropriate safeguarding lead without delay. Concerns must be logged.

If a staff member has serious concerns about immediate risk to a child or that a child has suffered significant harm and continues to be at risk, they should contact Wandsworth Initial Point of Contact (IPOC) immediately - wherever possible with the support of the designated safeguarding lead or a deputy lead. If a child is in immediate danger the police should also be contacted.

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, dob, address and contact details for parents / carers.

A referral in urgent circumstances can be made on the telephone but a completed Early Help Assessment form is required as soon as possible with key details included (even if additional background information is completed later) as s47 enquiries cannot be progressed with the police unless a referral has been received.

**A referral in urgent circumstances can be made to the Multi Agency Safeguarding Hub (MASH) on the telephone but a completed Multi-Agency Referral Form (MARF) is required as soon as possible with key details included (even if additional background information is completed later) as s47 enquiries cannot be progressed with the Police unless a referral has been received. The MARF can be accessed online at <https://www.wandsworth.gov.uk/health-and-social-care/children-and-families/make-a-referral-to-the-multi-agency-safeguarding-hub/>**

**Referrals to MASH can be made by: Telephone: 020 8871 6622 or e-mail: [MASH@wandsworth.gov.uk](mailto:MASH@wandsworth.gov.uk)**

**The MASH is in operation Monday – Friday 9.00am to 5.00pm. At other times please contact the Out of Hours Duty Service on 020 8871 6000.**

## Key Personnel, Contact Details and Training

Role	Name	Contact Details	Training	Date
<b>Designated Safeguarding Lead (DSL) for the Prep School</b>	Katy Pickford	020 8874 7186 <a href="mailto:katy.pickford@hurlinghamsschool.co.uk">katy.pickford@hurlinghamsschool.co.uk</a>	Designated Safeguarding Lead (Level 3) Child Protection Refresher 2020 Mental Wellbeing in Children Online Safety (Level 2) Supporting Staff Wellbeing The Prevent Duty	September 2020
<b>Designated Safeguarding Lead (DSL) for the Nursery</b>	Richard McLelland	020 8874 7186 <a href="mailto:richard.mclelland@hurlinghamsschool.co.uk">richard.mclelland@hurlinghamsschool.co.uk</a>		
<b>Principal Member of the Board of Directors with responsibility for Safeguarding and School Prevent Lead</b>	Fiona Goulden	020 8874 7186 <a href="mailto:fiona.goulden@hurlinghamsschool.co.uk">fiona.goulden@hurlinghamsschool.co.uk</a>	<b>Designated Safeguarding Lead (Level 3)</b> <b>Advanced Cert in Online Safety for DSLs</b> Bereavement and Loss Child Protection Refresher 2020 Supporting Staff Wellbeing The Prevent Duty Mental Health First Aid (2 day course) <b>National Online Safety for DSLs</b> Adverse Childhood Experiences (ACEs) Raising Awareness of Peer-on -Peer Abuse	September 2021 September 2021 August 2020 August 2020 August 2020 August 2020 May 2019 September 2021 August 2020 October 2021
<b>Head (Deputy DSL)</b> (fully DSL trained and will act in the absence of the DSL (or other designated members of staff) or in the event that an allegation is made against the DSL).	Simon Gould	020 8874 7186 <a href="mailto:Simon.gould@hurlinghamsschool.co.uk">Simon.gould@hurlinghamsschool.co.uk</a>	<b>Designated Safeguarding Lead (Level 3)</b> Child Protection Refresher 2020 <b>Advanced Cert in Online Safety for DSLs</b>	September 2020 August 2020 October 2021
<b>Head of Early Years</b> Designated Member of Staff with status and authority for Child Protection working in the Early Years Foundation Stage and our EYFS setting at Hurlingham Prep	Sarah Sinclair	020 8874 7186 <a href="mailto:sarah.sinclair@hurlinghamsschool.co.uk">sarah.sinclair@hurlinghamsschool.co.uk</a>		

<b>Deputy Head of Nursery</b> Designated Member of Staff (DMS) with status and authority for Child Protection for the Hurlingham Nursery to act in the absence of the Head of Nursery.	Gemma Kirk (Deputy)	<a href="mailto:gemma.kirk@hurlinghamschool.co.uk">gemma.kirk@hurlinghamschool.co.uk</a>	Designated Safeguarding Lead (Level 3) Child Protection Refresher 2020	September 2021
<b>Chairman of the Board of Directors</b>	George Duncan	020 8871 9992	<a href="mailto:georgeduncan8@me.com">georgeduncan8@me.com</a>	
<b>Member of Board of Advisors with Safeguarding and Child Protection Oversight</b>	Susie West	Care of: office@hurlinghamschool.co.uk		

### Wandsworth Local Authority

**Wandsworth Initial Point of Contact (IPOC)** – to be contacted straight away if a staff member has serious concerns about immediate risk to a child or that a child has suffered significant harm and continues to be at risk.

**Referrals to IPOC can be made by: Telephone: 020 8871 6622 and/or e-mail: [IPOC@wandsworth.gov.uk](mailto:IPOC@wandsworth.gov.uk)**

The IPOC is in operation Monday – Friday 9.00am to 5.00pm. At other times please contact the Out of Hours Duty Service on 020 8871 6000.

Role	Name	Telephone	Email
Safeguarding in Education Lead	Ameliah Rayn	020 8871 7961  Mobile: 07929 862 210	ameliah.rayn@richmondandwandsworth.gov.uk <a href="mailto:smacaulay@wandsworth.gov.uk">mailto:smacaulay@wandsworth.gov.uk</a>  * Use mobile number during pandemic period as she is likely to be remote working.
Early Education Safeguarding Lead	Matt Hutt		
IPOC / MASH referral and assessment service		020 8871 6622	<a href="mailto:mash@wandsworth.gov.uk">mash@wandsworth.gov.uk</a>  <a href="mailto:earlyhelpsystems@richmondandwandsworth.gov.uk">earlyhelpsystems@richmondandwandsworth.gov.uk</a>
Out of hours duty service		020 8871 6000	
Safeguarding Standards Service	Manager: Ruth Lacey Principal Administrator: Jackie Reynolds	020 8871 7208	<a href="mailto:Lado@richmondandwandsworth.gov.uk">Lado@richmondandwandsworth.gov.uk</a>
LADO Officer	Anita Gibbons	07974 586461	<a href="mailto:Anita.Gibbons@richmondandwandsworth.gov.uk">Anita.Gibbons@richmondandwandsworth.gov.uk</a>
Police Current Police Sergeant for schools liaison	Louise Dann	07767 3411 286	

Wandsworth safety net (for Independent Domestic Abuse advisors)		0207 801 1777	
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### Prevent / Counter extremism

Role	Name	Telephone	Email
PREVENT and Hate Crime Co-ordinator	Shamila Majid	Mob: 07974586486	Shamila.Majid@richmondandwandsworth.gov.uk
Local police force	Wandsworth	Emergency 999 Non-emergency 101	
Anti-terrorist hotline		0800 789321	
DfE dedicated telephone helpline and mailbox for non-emergency PREVENT advice for staff and governors		020 7340 7264	Counter.extremism@education.gov.uk

### Other Local Authorities

Anyone concerned about a child can contact the Children's Social Care Services Department in the local authority where the child is resident. Authorities near to the School include:

Local Authority	Working Hours	Out of Hours
Hammersmith and Fulham	020 8753 6600	020 8748 8588
Kensington and Chelsea	020 7361 3013	020 7361 3013
Richmond	020 8891 7969	020 8770 5000
Kingston	020 8547 5008	020 8770 5000

### Other numbers

The following telephone numbers may be useful for pupils and parents:

ChildLine	0800 1111
NSPCC	0808 800 5000
Child Exploitation Online Prevention (CEOP)	0870 000 3344
Ofsted's Whistleblower Hotline	0300 123 3155

The Board of Directors is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty, and our local multi-agency safeguarding arrangements).

### **Human Rights Act**

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

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

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

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

### **Equality Act 2010**

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

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

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

For further information Equality Act guidance | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

### **Related guidance, policies and procedures.**

This Safeguarding and Child Protection Policy applies to all aspects of Hurlingham School's work, including the EYFS, Nursery and Reception classes. It should, where necessary, be read in conjunction with the appendices to this policy and other related policies and procedures to which this policy has clear links including the following:

- Safeguarding and Safer Recruitment Policy
- Staff Code of Conduct (contained within the staff handbook)
- Whistleblowing (Raising Concerns for Professional Reasons) Procedures (contained within the staff handbook)
- Anti-bullying Policy (including information about sexual and cyber-bullying)
- PSHEE Policy and Scheme of Work (including information about cyber-bullying)
- RSE Policy
- Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy
- Health and Safety Policies
- Social, Emotional and Mental Health Policy
- First Aid Policy
- Staff Guidance Booklet on Prevent
- Policy Regarding Acceptable Use of Computing and Online Safety, including Mobile Phones
- Taking, Using and Storing Images of Children Policy
- Pupil Restraint Policy (Appendix 13)
- Procedures for when a Member of Staff, Volunteer, Child Protection Officer, Head or Principal faces Allegations of Abuse (Appendix 10)
- Self-harm (Appendix 14)

Each of these policies is also concerned with the protection of all children in the school from various kinds of harm.

All of these policies and any others referred to in the main body of this policy are available either on the school website, the Policy shared drive, the school internal network or upon request from and to view in the School Office.

This policy has been prepared with regard to ISSRs 2014 Statutory Regulations, local guidance from the Wandsworth Safeguarding Children Partnership and the DfE guidance publications entitled '*Keeping Children Safe in Education*' (September 2021) (KCSIE) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (September 2018) <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>
- KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- KCSIE also refers to *When to call the police*, non-statutory guidance from the National Police Chiefs' Council. <https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

London Child Protection Procedures 2017 (5<sup>th</sup> Edition amended October 2017)

<https://www.londoncp.co.uk/>

and

*'Working Together to Safeguard Children'* (September 2018) (WT).

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)



WT refers to the non-statutory advice: *Information sharing* (2018)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

Prevent Duty Guidance: for England and Wales (July 2015) (Prevent).

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Prevent is supplemented by non-statutory advice and a briefing note:

- The Prevent duty: Departmental advice for schools and childminders (June 2015)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)
- The use of social media for on-line radicalisation (July 2015) (DfE) – Non Statutory Guidance  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/440450/How\\_social\\_media\\_is\\_used\\_to\\_encourage\\_travel\\_to\\_Syria\\_and\\_Iraq.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf)

Early Years Foundation Stage (EYFS) Statutory Framework (April 2017) – Statutory Guidance

[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) (up publishing to 31/8/2021)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/974907/EYFS\\_framework\\_-\\_March\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974907/EYFS_framework_-_March_2021.pdf) (from 1/9/2021)

Children Missing Education (September 2016) – Statutory Guidance

[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)

Multi-Agency Guidance on FGM (April 2016) – Statutory Guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912996/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_MASTER\\_V7\\_-\\_FINAL\\_July\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912996/6-1914-HO-Multi_Agency_Statutory_Guidance_on_FGM_-_MASTER_V7_-_FINAL_July_2020.pdf)

Sexual violence and sexual harassment between children in schools and colleges (2021) - Non Statutory Guidance

The UK Safer Internet Centre (<https://www.saferinternet.org.uk/about>)

CEOP's Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk))

*Promoting the Education of Looked After and Previously Looked After Children* (DfE)

*Mental Health and Behaviour in Schools* Departmental Advice

*Counselling in Schools; a blueprint for the future* (February 2016)

Relationships and Sex Education (RSE) and Health Education (September 2021). DfE statutory guidance.

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

This policy has been prepared in consultation with Wandsworth Children's Specialist Services and has additional regard to the requirements set out in both:

- the Children Act 2004 and 2006 which provide the legal basis for how social services and other agencies deal with issues relating to children and the guiding principles for the care and support of children and
  - Section 175 of the Education Act 2011 regarding the arrangements schools must have in place to safeguard and promote the welfare of pupils.
- and the non-statutory document:
- Mental Health and Behaviour in Schools (March 2015)
  - SEND Code 2015

The purpose of this policy is to assist the Principal, who is the responsible member of the Board of Directors as proprietors of the School, in ensuring that arrangements are made to safeguard and promote the welfare of pupils at the school and that such arrangements have regard to any guidance issued by the Secretary of State.

All references to EYFS include our Nursery and Reception provision on both sites.

## 1. Introduction

The Directors and staff of Hurlingham School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all pupils at the school. We recognise that all staff, including volunteers, have a full and active part to play in protecting pupils from harm.

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
- Taking action to enable all children to have the best outcomes

We believe that our school should provide a caring, positive, safe and stimulating environment in which pupils can learn and which promotes the social, physical and emotional wellbeing of each individual pupil, and which takes a child-centred approach.

The school recognises its responsibilities and duties to report Child Protection concerns to the social work service within Children's Services and to assist Children's Services in Child Protection enquiries and in supporting Children in Need.

The school will raise Child Protection / Safeguarding concerns with parents / carers at the earliest appropriate opportunity, and work in partnership with them and other agencies to improve outcomes.

The school will ensure that all staff are provided with the appropriate training in Child Protection and Safeguarding issues, including Early Help processes, as recommended in the guidance. In particular the Designated Safeguarding Leads (DSL) will have their role explicitly stated in their job descriptions and will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively. Designated leads will also ensure that all staff are provided with Part One of Keeping Children Safe in Education 2021 guidance and assisted to understand and discharge their roles and responsibilities as set out in this guidance.

Operation Encompass is a Police and education early information sharing partnership enabling schools and early years settings to offer immediate support to children and young people experiencing domestic abuse. Information is shared by the Police through a system, 'The Box', with the school/setting's; trained Designated Safeguarding Lead (DSL) via Email on the morning of the next school day after officers have attended a domestic abuse incident, thus enabling appropriate support to be given, dependent upon the needs and wishes of the child.

The email will only inform the Designated Safeguarding Lead that the Police have attended an incident and will request that the school is mindful of that in their care and responses to the child throughout the school day. The school will not be informed about the specific details of the incident and the information is shared securely with the Designated Safeguarding Leads and is treated as sensitive and confidential.

This enables the immediate and discrete recognition of the child's situation by the DSL, ensuring the provision of a secure, supportive and emotionally connected environment by the school so that the wider effects of abuse are ameliorated. Operation Encompass ensures that all incidents of domestic abuse are shared with schools and early years settings, not just those where an offence can be identified.

Research shows that children who are involved in or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child, and so that support can be offered to the child if necessary. The school is part of the network available to support the family and child.

## 2. Our Aims

We believe that our school should provide a caring, positive, safe and stimulating environment in which pupils can learn and which promotes the social, physical and emotional wellbeing of each individual pupil, and which takes a child-centred approach.

We support open practice, good communication and a safe culture in which children can thrive and learn.

With this in mind, the aims of our Safeguarding and Child Protection policy are to:

- ensure a culture of safety, equality and protection.
- ensure that every member of staff, volunteer and senior advisor knows the name of the Designated Safeguarding Lead in school and their role
- teach pupils how to keep safe and to recognise any behaviour that is unacceptable
- identify and make provision for any pupil that has been subject to, or is at risk of abuse, neglect or exploitation
- raise awareness amongst all school staff, including volunteers, of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse
- emphasise the need for good communication between all members of staff in matters relating to child protection and concerns about possible radicalisation ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately
- implement a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse
- provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns
- work openly and in partnership with parents in relation to child protection concerns
- support all pupils' development in ways that will foster security, confidence and independence
- promote safe practice and challenge poor and unsafe practice
- promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children
- to ensure that all vulnerable children, including those who need a social worker and those requiring mental health support are provided with appropriate help in school to ensure their needs are identified and responded to effectively
- to ensure that all adults working within our school have been checked as to their suitability to work with children, in line with current guidance and to create a culture where staff feel comfortable, if appropriate, to discuss matters outside work, which may have implications for the safeguarding of children in the workplace.
- integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages
- To take account of and inform policy in related areas, such as anti-bullying; online safety; discipline and behaviour; health and safety; child on child abuse; missing children; child sexual exploitation; FGM; violence in the name of honour; serious youth violence, including knife crime; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice
- To comply with the core responsibilities expected of the school as a relevant agency to the multi-agency safeguarding arrangements in Wandsworth, as set out in the Wandsworth Safeguarding Children Partnership published arrangements

- The ethos of the school supports open practice, good communication and a safe culture in which children can thrive and learn.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately.

### 3. Definitions

Child abuse is taken to refer to any child of under 18 years who, through the actions of adults (with a caring role for that child) or their failure to act, has suffered or is at risk of suffering significant harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (eg via the internet). They may be abused by adults or another child or children

- Behaviours such as alcohol and substance misuse, truanting and sexting put children at risk or in danger and safeguarding issues can manifest themselves via peer-on-peer abuse, including cyber-bullying and gender-based violence / sexual assaults.
- Abuse can take place wholly online or technically may be used to facilitate offline abuse.
- Abuse is broadly divided into four categories:- Neglect, Physical Injury, Sexual Abuse and Emotional Abuse. Brief definitions are given below. Guidance for recognising the indicators of possible abuse are attached as Appendix 2.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child from physical harm or danger or the failure to ensure access to appropriate medical care and treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.
- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child who they are looking after. This situation is now known as illness fabricated or induced by carer (previously Munchausen Syndrome by Proxy).
- **Sexual abuse** involves forcing or enticing a child or a young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g rape) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment can include, but is not limited to sexual comments, sexual 'jokes' and taunting, physical behaviour such as deliberately brushing up against someone and online sexual harassment.
- **Emotional abuse** is the persistent ill treatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve 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 ill treatment of a child although it may occur alone.

It is important to recognise that many children will be living (or may have lived) in families where **Domestic Abuse** is a factor, and that these situations have a harmful impact on children emotionally, as well as placing them at risk of physical harm. The definition of Domestic abuse is below:

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

*All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.*

For the purposes of this policy, 'consent' is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. Given the age range of pupils at Hurlingham School 'consent' will never be considered to have been given.

**Child sexual exploitation (CSE)** is a form of child sexual abuse. It occurs where an individual; or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

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

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

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

**Female Genital Mutilation (FGM):** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

FGM is illegal in the UK and there is a mandatory duty on schools to report cases of FGM to the police.

**Honour Based Abuse (HBA)** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

**Children Who Go Missing from Home or Care** are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high risk activities
- Involvement in criminal activities

- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on schooling and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency / alcohol dependency
- Crime
- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

**Children Missing from Education:** all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect. We will follow the required procedures for unauthorised absence and for dealing with children who go missing from education, including appropriate notification to the Local Authority. We will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as **travelling to war zones, FGM and forced marriage**.

**Prevent:** all schools must have due regard to the need to prevent pupils from being drawn into extremism, terrorism or being radicalised. We will ensure that staff are provided with appropriate training and information to enable them to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and identify any child who may be at risk and how to support them. We will also ensure that children are safe from terrorist and extremist material when accessing the internet in school. Concerns will be discussed with the child's parents whenever possible and with the Local Authority Prevent co-ordinator and referrals made to the Channel programme when appropriate. We understand our responsibilities as set out in the Prevent Duty and legislation and will ensure these are adhered to. Contact with regards to queries can be made via the Prevent Email: [Prevent@richmondandwandsworth.gov.uk](mailto:Prevent@richmondandwandsworth.gov.uk)  
[Mark.Wolski@richmondandwandsworth.gov.uk](mailto:Mark.Wolski@richmondandwandsworth.gov.uk) : Chair Of Channel Panel

#### 4. Our Responsibilities and Duties

The Principal and staff of Hurlingham School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all pupils at the school (section 157 of the Education Act 2002). All staff, including volunteers, have a full and active part to play in identifying children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

We understand that it is essential that children receive the right help at the right time to address risks and prevent issues escalating. All staff are trained to appreciate the importance of acting on and referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

The Principal, the Board of Advisors and the Board of Directors take strategic leadership responsibility for the School's safeguarding arrangements and will ensure that they comply with their duties under legislation. They will ensure that the policies, procedures and training are effective and comply with the law at all times and take into account the procedures and practice of the WSCP. The Board of Advisors and the Board of Directors review and approve the DSL's Job Description annually and this is confirmed by the Chair of each Board. Part of the DSLs' daily responsibilities is to oversee all safeguarding matters, including provision of adequate time, funding, supervision and support for themselves and all other members of staff in order to ensure that the School's child welfare and safeguarding responsibilities are carried out effectively.

The Principal will remedy any deficiencies or weaknesses in regard to Child Protection arrangements that are brought to her attention without delay.

We understand that safeguarding children - the action we take to promote the welfare of children and to protect them from harm – is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play and that children are best protected when professionals are clear about what is required of them individually, and how they need to work together.

We understand that it is our duty not only to safeguard children who have suffered or are likely to suffer significant harm but also to support those who are in need of additional support from one or more agencies. Such cases would lead to inter-agency assessment under the guidance of Wandsworth Local Authority and would include the use of the 'Early Help Assessment', the 'Common Assessment Framework' (CAF) and the 'Team around the Child' (TAC).

We recognise that a child may be at risk of harm as a result of being drawn into extremist or terrorist behaviour. Under the Government's 'Prevent' strategy school staff must be able to identify children at risk of being drawn into terrorism, challenge extremist ideas and know how to refer children for further help. Information about the Prevent duty and the School's approach to identifying and supporting children at risk of radicalisation is set out in Appendix 11.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk of harm. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.

Our school provides a child centred approach to safeguarding with a caring, positive, safe and stimulating environment in which pupils can learn and which promotes the social, physical and emotional wellbeing of each individual pupil. This approach is based on a clear understanding of the needs and views of children.

It is our responsibility and duty to report Child Protection / Safeguarding concerns to the social work service within Children's Specialist Services (previously Social Services) and to assist Children's Specialist Services in Child Protection enquiries and in supporting Children in Need.

We raise Child Protection, Safeguarding and Radicalisation concerns with parents / carers at the earliest appropriate opportunity, and work in partnership with them and other agencies to improve outcomes. However, if the child is at risk of significant harm parental consent is not required but consideration must always be given as to who informs the parents / carers and when.

The school will ensure that all staff are provided with the appropriate training in Child Protection and safeguarding (including online safety) and Prevent issues, at least annually or as recommended in the guidance. In particular designated members of staff will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying and the sharing of indecent images.

All staff are required to read this policy carefully and to be aware of their role in these processes. All new staff will have the opportunity to discuss safeguarding requirements and this policy during their induction process.

## **5. Key Principles**

- We believe that all children have a right to be protected from harm and /or abuse.
- We recognise that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the child's cultural and social background when dealing with CP and safeguarding issues. However, we also recognise that the needs of the child are paramount and any concerns will be referred on appropriately whatever the family background of the child concerned.
- We recognise that because of the day to day contact with children school staff are extremely well placed to observe outward signs of abuse.

- We recognise that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self-blame.
- We recognise that the school may provide the only stability in the lives of children who have been abused or are at risk of harm.
- We recognise that abuse and neglect are complex issues and rarely stand-alone events and therefore require a culture of vigilance, professional curiosity and respectful challenge and effective recording and monitoring systems.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn.
- All staff are 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.
- We know that it is important that children feel secure, are encouraged to talk and are listened to sensitively, and that children know that there are adults in school whom they can approach if they are worried or unhappy.
- We acknowledge that (although all designated / key staff have the skills and experience to respond to a variety of situations and issues) there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a pupil can be spoken to by a same sex member of staff (who has received enhanced training) if this is felt to be appropriate.
- We adhere to the principles of working in partnership with those who hold parental responsibility for each child.
- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount.
- All staff are aware of the relevant data protection principles (under DPA 2018 and the GDPR), but are also clear that where there is the need to safeguard or promote the welfare of a child, relevant and proportionate information must be shared.

## 6. Procedures

Our school procedures are in line with those agreed by the Wandsworth Safeguarding Children Partnership (WSCP), the LA and the Secretary of State (see Appendix 4 for details how to report concerns and the referral flow chart)

We will therefore ensure that:

- All staff are provided with the appropriate training in Child Protection and Safeguarding issues, including Early Help processes, as recommended in the guidance. In particular the designated safeguarding leads will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.
- We have a Designated Safeguarding Lead who has received appropriate training and support for this role, in accordance with mandatory requirements.



- The Head is the Deputy Designated Safeguarding Lead and we have a minimum of two additional members of staff who will act in the absence of the DSL and DDSL and has also received appropriate training for this role.
- We will ensure designated staff attend training and receive relevant updates every year and all staff are provided with training at induction and thereafter on a regular basis including safeguarding briefings and updates at least annually.
- Induction and refresher training for staff members will include the school's behaviour policy and procedures for children missing education as well as the staff code of conduct and this CP / safeguarding policy.
- The roles of the designated safeguarding leads are explicit in their job descriptions
- Every member of staff and volunteer knows the name of the Designated Safeguarding Lead (DSL) for each site and their role and what the back-up arrangements are if the DSL is unavailable.
- All staff have access to a DSL at all times during the school day so that they can report concerns and seek advice/guidance if required.
- All staff are familiar with the school's Safeguarding and Child Protection Policy as well as the staff code of conduct and these issues are included in the induction for each new staff member.
- Designated leads will ensure that all staff are provided with Part One of the most current version of Keeping Children Safe in Education guidance and assisted to understand and discharge their roles and responsibilities as set out in this guidance.
- All staff ensure that, while working with pupils in EYFS, all mobile phones are not used and are put fully away into a bag or pocket. In the case of pupils of EYFS (Nursery and Reception) age, this is a legal requirement. The only exception is in the event of an emergency in order to summon help. Staff must report anyone found using a mobile telephone in the presence of EYFS pupils to a member of the SLT immediately. (Please refer to the *Policy Regarding Acceptable Use of Computing and Online Safety, including Mobile Phones* and the *Taking, Using and Storing Images of Children Policy*.)
- All staff develop their understanding of signs and indicators of abuse and report any concerns to the designated lead but know that they can also refer direct to Children's Services (Social Services) if needed
- We will ensure that all staff are aware that it is important to identify any concerns about children at as early a stage as possible so that their needs can be identified and monitored and appropriate support put in place .
- We are aware of risks to children online and will ensure children are safeguarded in school from potentially harmful and inappropriate online material through appropriate filtering and monitoring systems and educated in how to be as safe as possible online.
- When considering referrals to support agencies the school will act in accordance with WSCP Thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need thresholds
- All staff are aware that they should raise any concerns about colleagues or other adults with the DSL or the Head
- All staff know how to respond appropriately to a child who discloses abuse.
- All staff are aware that mental Health Problems can be a sign or indicator of abuse, neglect or exploitation and immediate action must be taken in line with safeguarding procedures and in consultation with the DSL. See the School's *Social, Emotional and Mental Health (SEMH) Policy*.

- All staff know the standard procedure of reporting any concerns to the DSL but are also aware that anyone can make a referral if necessary. Anyone other than the DSL making a referral, however, MUST notify the DSL of the referral at the earliest opportunity.
- All parents / carers are made aware of the responsibilities of staff members with regard to Child Protection procedures. All parents are informed that the school has a child protection/safeguarding policy (available to view on the school website or on request from the School Office) and is required to follow WSCP guidelines in respect of reporting suspected abuse to Children's Social Care.
- Pupils and parents will be made aware of how the school's safeguarding system works and with whom they can discuss any concerns.
- We ensure that systems are in place for children to confidentially report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will easily understood and easily accessible.
- We take account of and inform policy in related areas, such as anti-bullying; e-safety; discipline and behaviour; health and safety; missing children; child sexual exploitation; FGM; honour based violence; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice.
- We will refer any child believed to have suffered or to be likely to suffer significant harm to Children's Social care without delay, and will follow up any such referral in writing as quickly as possible (on the same day).
- We ensure the immediate safety of any child felt to be at serious risk by taking appropriate action and by involving other relevant agencies as necessary.
- We will continue to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at CP case conferences wherever possible and providing reports as a matter of course.
- We will contribute to multi – agency assessments of children's needs where appropriate and work in a fully integrated way with other relevant services as appropriate.
- We provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns.
- If a child's situation does not appear to be improving, the school will take responsibility for finding out what is happening and keep pressing for action to be taken.
- Written records are kept of all concerns, whether or not there is a need to refer the matter immediately, and that these records are kept securely, separate from the main pupil file, in a locked location in the Head's office or securely using an appropriate computerised system.
- All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing.
- All staff members are made aware of the record keeping requirements and how they are expected to record any safeguarding concerns.
- The Child's social worker is notified of any pupil who is subject to a 'Child Protection Plan' who is absent from school without explanation for more than 2 days.
- Any new concern or relevant information about a child who is subject to a 'Child Protection Plan' is passed to the child's allocated social worker without delay.

- If a child subject to a Child Protection Plan leaves the school, records will be transferred to the new school without delay and in a secure manner which ensures acknowledgement of receipt of the information. The child's social worker will also be informed of the change.
- If school staff are unsure how to proceed in a potential Child Protection situation, or require advice, this will be appropriately sought via the Education Safeguarding Lead a duty manager in MASH or directly from the Safeguarding Standards Service. (useful numbers listed on pages 3-6)

## **7. Early Intervention and Help**

- All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided at as early a stage as possible.
- This involves identifying emerging problems; liaising with the designated lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking an Early Help Assessment (EHA).
- Any concerns will be identified by staff, discussed with relevant colleagues and parents and support put in place. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes.
- **Any** child may benefit from Early Help but school staff will be particularly alert to the potential need for support for any pupil who:
  - is disabled, has certain health conditions or has specific additional needs;
  - has special educational needs (whether or not they have a statutory education, health and care plan);
  - has mental health needs;
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - is frequently missing/goes missing from care or from home;
  - is misusing drugs or alcohol themselves;
  - Is at risk of modern slavery, trafficking or exploitation;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
  - has returned home to their family from care;
  - is showing early signs of abuse and/or neglect;
  - is at risk of being radicalised or exploited;
  - is a privately fostered child or previously looked after child.
- If appropriate support is not available within school's own resources, an Early Help Assessment will be completed to identify the child's needs and enable additional support to be sought from other agencies.
- A Team Around the Child will be established where appropriate and a Lead Professional identified.
- If Early Help is in place the situation will be kept under constant review and consideration given to additional referrals (eg to social care) if the child's situation does not appear to be improving.
- Early Help Assessments will follow the Signs of Safety and Wellbeing model.

## **8. Children with Special Educational Needs, Learning Difficulties and Disabilities, English as an Additional Language and Long Term Medical Needs.**

- We recognise that children with SEN, LDD or EAL may be especially vulnerable to abuse and expect staff to take extra care to interpret apparent signs of abuse or neglect.

- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the child's disability without further exploration.
- We will provide a school environment in which all pupils, including those with SEND, can feel confident and able to discuss their concerns, providing support with communication difficulties where needed, and differentiating appropriately.
- We recognise that children with SEN and disabilities are at higher risk of peer group isolation and may suffer a disproportionate impact from bullying and will provide proactive support to ameliorate these risks.
- The Designated Safeguarding Lead will work with the SEN co-ordinator, where necessary, to ensure that the needs of SEN pupils in relation to child protection issues are responded to appropriately (eg for a child with particular communication needs).
- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the child's disability without further exploration.
- Being infected or affected by a long-term medical condition such as HIV or AIDS is not a Child Protection issue. But, as with any medical condition that either a child or their family have, it may impact upon the wellbeing of that child.

## **9. Contextual Safeguarding**

- We understand that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college or within.
- All staff, but especially the designated safeguarding lead (or deputies), understand these extra familial issues and will ensure that the context within which such incidents and/or behaviours occur is considered, including whether the child is at risk of abuse or exploitation in situations outside their families..
- This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors and influences are present in a child's life that are a threat or pose a risk to their safety and/or welfare.
- We understand that extra-familial harms take a variety of forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence
- The school will contribute to the assessments and mapping processes, taking these extra familial risks into account and sharing relevant information with social workers and other professionals in order to enable all such factors to be taken into account when risk to children is being assessed.
- This will allow any assessment to consider all the available evidence and the full context of any abuse.

## **10. Looked After Children**

- The DSL understands the requirements relating to looked after children and the role which the School is required to play. The school will ensure there is a designated teacher whose role is to promote the educational achievement of children who are looked after, and that the identified person has received appropriate training as defined in the Children and Young Persons Act 2008. The DSL has the knowledge, skills and understanding necessary to keep safe children who are looked after by a local authority and will maintain up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers. The DSL is aware of the statutory guidance to local authorities "Promoting the Education of looked after and previously looked after children".
- We will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.

They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her, as well as the details of the child's social worker and the virtual school head in the LA.

- We will work with the virtual school head to discuss how the pupil premium plus funding can be best used to support the progress of Looked After Children in the school.
- We recognise that children who were previously Looked After; Care Leavers and other children living away from home are also additionally vulnerable and may continue to require support at a higher level.

## **11. Mental Health and Behaviour**

- In order to help our pupils succeed, we recognise that the school plays an important role in supporting them to be resilient and mentally healthy.
- We will ensure that pupils and their families are enabled to participate as fully as possible in decisions and are provided with information and support.
- We recognise that some children are more at risk of developing mental health problems than others. These risks can relate to the child, their family or to community and life events and may include children who have experienced abuse. Staff will not attempt to make a diagnosis of mental health problems but will ensure that this is done by a trained mental health professional.
- Risk factors are cumulative, and children exposed to multiple risks are more likely to develop behavioural or mental health problems.
- Where severe problems occur, we will ensure that appropriate referrals are made (with consent) to specialist services (eg CAMHS).
- All staff undertook 'Mental Wellbeing in Children and Young People' training prior to the start of the Autumn term 2020. Additional training in 'Adverse Childhood Experiences' was also made available to all staff.
- All staff will be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one and are aware to raise concerns relating to Mental Wellbeing in the same manner as any other safeguarding concerns.
- If we have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken in line with our policy.
- The School has stand-alone whole School 'Mental Health and Wellbeing Policy' for pupils and staff which addresses the processes for identifying, escalating and referring concerns in greater detail. The DSLs are, satisfied that the current protocols already in place ensure that staff are able to identify and refer any concerns they may have in line with the existing safeguarding referral procedures.

## **12. Communication with Parents/Carers**

- We will ensure that all parents are informed that the school has a child protection / safeguarding policy and is required to follow WSCP guidelines and other statutory documents in respect of reporting suspected abuse to Children's Social Care.
- Pupils and parents will be made aware of how the school's safeguarding system works and with whom they can discuss any concerns.
- Information will also be made available about any local and national telephone helplines.
- In individual cases, parents will be notified of the schools' concerns at the earliest appropriate opportunity.
- Although parents will normally be kept informed as appropriate of any action to be taken under these procedures to support a child in need or about whom there are any concerns relating to radicalisation.

However, there may be circumstances when a Designated Safeguarding Lead will need to consult the LADO, Local authority children's social care services/the Channel Panel and/or the police before discussing details with parents.

- Where reasonably possible, the School holds more than one emergency contact for each pupil. This is particularly important for pupils with fewer than two parents.

### **13. Confidentiality**

- All staff are aware that they cannot promise a child that they will keep certain information secret.
- We recognise that matters related to Child Protection are of a confidential nature. The Designated Safeguarding Lead and / or Head will therefore share detailed information about a pupil with other staff members on a need to know basis only.
- All staff are aware that they have a professional responsibility to share information with the designated safeguarding lead other relevant agencies where necessary to safeguard and promote the welfare of children.

## **14. Support and Training for Staff**

### **Support**

- We recognise that staff working in the school who have been dealing with child protection issues may find the situation stressful or upsetting.
- We will ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have.
- We will ensure that formal supervision is provided for staff working in Early Years and foundation stage as required.
- We will consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate.

### **Training**

- All staff, both new and existing, must read at least the latest versions of Part One and Annex B of KCSIE as soon as is practicable once they are published and are tested to ensure that they have done so.
- The Principal on behalf of the Board of Directors will ensure that all Advisors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.
- We will ensure designated staff receive two-yearly training and this will be supplemented by informal updates as required but at least annually. All new staff are provided with training at induction and thereafter on a regular basis including safeguarding briefings and updates at least annually.
- Such training will either be provided by an external organisation, contracted in to school as part of a whole-staff training event, or it will be cascaded to staff from the DSLs, who has accessed and completed on-line Prevent awareness training and who regularly attends Wandsworth safeguarding briefing meetings. Detailed training records are kept by the DSLs.
- All staff are briefed on key Prevent measures as part of their induction and in annual safeguarding training.
- All new staff are trained in line with the details given in the School's Staff Induction Policy. The Induction programme will include:

- Safeguarding and all Child Protection Policies (including the identity of the designated member of staff and any deputies, procedures for dealing with peer-on-peer abuse and Part One and Annex B of Keeping Children Safe in Education - KCSIE)
- Staff Handbook (including the Code of Conduct and Whistleblowing procedure)
- The Acceptable Use Policy, E-safety Policy, BYOD Policy and Taking, Storing and Using Images of Children Policy)
- Guidance on using CPOMS for recording concerns, rewards, sanctions and neutral notifications.
- The Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy and the Anti-Bullying Policy (including cyberbullying, prejudice-based and discriminatory bullying)
- The School's response to children who go missing from education (included in the Safeguarding and Child Protection Policy)
- An explanation of the staffing structure in our school
- Being introduced to as many of our staff as possible, but especially the staff in their form and their Head of Section
- A guided tour of our school, identifying their classroom, other teaching rooms and resource cupboards. Points of general organisation will also be discussed
- Time to meet the teachers in the form that they will be working to discuss planning. Shadowing a teacher in the form in which they will be working or the current class teacher of the children that they will be teaching
- Time to discuss any points or queries with the Induction Co-ordinator.
- A meeting with their Head of Section and/or our Head regarding their new job description.

We train all staff to understand our safeguarding policy and procedures and ensure that they have up to date knowledge of safeguarding issues. Training enables staff to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. These may include:

- significant changes in children's behaviour;
- deterioration in children's general well-being;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

**All designated members of staff (DSL) who have status and authority for Child Protection within the school** have received appropriate training and support for this role – See pages 2-3 for details.  
Retraining for the roles of DSL/DDSL and DMS staff will be arranged every two years in line with KCSIE guidance.

## 15. Allegations against Staff or Volunteers

- We recognise that there will be occasions when a pupil at the school, or a parent or another person may make an allegation against a member of staff (including supply or agency staff or contracted staff) or volunteer. The term allegations refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity.
- The majority of allegations against staff and volunteers relate to their behaviour in the workplace. However, some concerns may relate to their personal life or the care of their own children. In some cases, there may have been an allegation of abuse against someone closely associated to them and this person may pose a risk of harm to the children the staff member or volunteer is responsible for.
- We expect any member of staff or volunteer who is concerned about the behaviour or presentation of a colleague, or sees an incident which concerns them, to discuss this as soon as possible with the DSL or Head. If necessary, the whistleblowing procedures can be used but an ethos should be encouraged which

enables open discussion and allows staff or volunteers to feel able to discuss any concerns without fear of reprisal. Please see **Appendix 17** for the new **Neutral Notifications Policy**

- In the event that the concern is raised with the DSL then the Head (or Principal – also trained as a DSL and with overall responsibility for Safeguarding on behalf of the Board of Directors), if allegation is against the Head) must be informed and the Wandsworth Procedures for Managing Allegations against Staff followed. This will always involve a discussion with LA officers and a referral to the Local Authority Designated Officer (LADO) where appropriate within 24 hours of the concern / allegation becoming known.
- The criteria for making a referral to The LADO is that an individual may have:
  - behaved in a way that has, or may have, harmed a child;
  - possibly committed a criminal offence against or related to a child; or
  - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children:
  - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- The LADO also offers a consultation service, which supports those investigating an allegation or concern and provides expert advice. Every consultation with the LADO is followed up in writing to reflect the advice and guidance given. This means the school will have a clear record of their correspondence with the LADO, which provides important evidence (for example if they are inspected by OFSTED). It also holds the LADO accountable for the advice given.
- In the event that an allegation is made against supply staff, the School will take the lead and keep the supply agency fully informed and involved. In no circumstance will the School simply cease to use supply staff for safeguarding reasons.
- All staff are expected to recognise the need for absolute confidentiality in these situations.
- **The School is committed to reporting any person to the DBS – whether employed, contracted, a volunteer or a student - (within one month of that person leaving the school) whose services are no longer used because he or she is considered unsuitable to work with children.**
- The school will also fulfil its duty to consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.
- Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. See Appendix 12.

## **16. Whistleblowing (Raising Concerns for Professional Reasons)**

We understand the requirement to have clear whistleblowing procedures based on the importance of the following key principles:

- we ensure that the school has culture of safety and of raising concerns.
- we ensure that the school has a culture of valuing staff and of reflective practice
- we understand that children cannot be expected to raise concerns in an environment where staff fail to do so.
- we ensure that staff are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the actions and attitude of their colleagues.
- we have clear processes for reporting allegations.
- we provide training and support for staff.
- we understand the need for transparency and accountability in relation to how concerns are received and handled.
- All staff are required to report to the Head, or Principal in his absence, any concern or allegations about poor or unsafe school practices, potential failures in the School's safeguarding regime or the behaviour of



colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

- Staff should also refer to full procedures for whistleblowing (Raising Concerns for Professional Reasons) in the staff handbook which details the school's procedures for reporting and handling concerns, including about poor or unsafe practice and potential failures in the school's safeguarding regime, provision for mediation and dispute resolution where necessary.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Please see **Appendix 17** for the new **Neutral Notifications Policy**

## 17. Safe Recruitment

- The school will ensure that it operates a safe recruitment policy to ensure that all those working in the school, in either a paid or unpaid capacity are suitable to do so as far as can be reasonably ascertained.
- Senior Leaders and any other staff involved in selection procedures are given Safer Recruitment training.
- Appropriate checks (as detailed in the "Safeguarding and Safer Recruitment Policy") are carried out on all potential employees and volunteers, and all references are taken up and verified. The school will ensure it is following the most recent guidance in respect of these issues, including taking account of the definition of regulated activity.
- All staff are checked to ensure that they are not 'disqualified from childcare' and staff are reminded regularly to disclose any relevant information in this regard. All staff are required to sign the declaration form annually.
- The school will ensure compliance with Section 3 of Keeping Children Safe in Education 2021 in relation to recruitment, recruitment checks, obtaining of references, s128 checks (where applicable) and information that must be included on the single central record (SCR).
- Interview panels will follow recommendations from the HR section in relation to practice. One member of each interview panel must have completed Safer Recruitment training.
- At interview, candidates will be asked to account for any gaps in their employment history.
- In accordance with the requirements of *Prevent* we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised.

Please refer to our '**Safeguarding and Safer Recruitment Policy**' for full guidance.

## 18. Management of Safeguarding

- The Deputy Head Pastoral and Operations is the DSL for the Prep School and the Head of Nursery is the DSL for the Nursey. They take responsibility for child protection matters including Prevent.
- It is the job of the DSL to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice. The DSLs work closely with the Head and, where appropriate, other members of staff who have received training in the role of DSL to ensure that the policy and procedures are being followed.
- The job description of the designated safeguarding lead includes the key activities of the role.
- All staff receive regular training in safeguarding and are aware of the importance of discussing any concerns they may have about welfare and safeguarding matters as well as their duty to report any welfare

and safeguarding concerns to the designated safeguarding lead, or in the absence of action, directly to local children's services.

## 19. Arrangements for Reviewing Policies and Procedures

All safeguarding policies are reviewed at least annually and at other times:

- when regulatory changes come are introduced;
- as a result of members of staff undergoing training or participating in inter-agency initiatives;
- when any shortcomings are identified; or
- when incidents within school prompt a review of our established practice.

The school's safeguarding policies and procedures are an agenda item at the Health and Safety Committee meetings at the start of each academic year but are subject to ongoing review by the DSLs.

Detailed notes about any low level concerns are retained in a secure area of the School's database and staff are encouraged to make use of this facility. This is to ensure that were there to be an accumulation of information, which independently might not cause serious concern, about a certain child, collectively this may raise alarm bells.

Details of all serious concerns are kept in a file in a locked filing cabinet in the Head's office and this is scrutinised as part of the annual review. This file is also used to complete request for Safeguard information to school when pupils leave Hurlingham.

From June, 2021 CPOMS will become the primary platform for recording and reviewing Safeguarding matters.

An annual review of the School's approach to online safety will be carried out and this will be supported by an annual risk assessment that considers and reflects the risks faced by pupils.

**Proprietorial Oversight:** The DSLs, in conjunction with the Head, undertakes an annual audit of the School's safeguarding procedures and this is then presented to the Principal who has overall Safeguarding for both the Prep School and Nursery on behalf of the Board of Directors. This document is shared annually with the Board of Advisors for discussion and review. This audit includes details on how the DSLs are satisfied that the policy is known in practice: The Principal oversees both the latest local authority S11 survey and our internal assessment questionnaires regarding policy and process. The account of the review will be minuted in sufficient detail to demonstrate both its breadth and depth.

The DSLs attend regular WSCB twilight meeting for schools to ensure that they are informed about current safeguarding practices.

## 20. Positive Handling and Physical Intervention

- Our policy on positive handling and physical intervention by staff is set out in '**Pupil Restraint Policy**' (Appendix 13) and acknowledges that staff should only use physical intervention in particular circumstances, and that even when necessary the minimum force should be used to prevent harm to the child or another child or adult.
- Risk assessments will be carried out where individual pupils have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers.
- These plans are intended to minimise the likelihood of challenging behaviour and that if and when it does occur there is less use of physical interventions and other restrictive methods.
- Physical intervention which causes injury or severe distress to a child may have to be considered under child protection or disciplinary procedures.

## 21. Specific Safeguarding Issues

Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary. The DSLs will attend relevant training and cascade information, or where relevant organise additional briefings or training input for staff. to ensure that staff are aware of issues such as those listed below, understand the indicators and recognise the complexities of these issues for young people:

- Child Sexual Exploitation
- Female Genital Mutilation
- Radicalisation
- Illness Fabricated and Induced
- Domestic Abuse (Domestic Abuse Act 2021)
- Violence in the name of Honour
- Children missing education
- Children and the court system
- Children with family members in prison
- Peer-on-peer abuse, including:  
bullying, online bullying, physical abuse, knife crime and serious youth violence, sexual violence and sexual harassment, including up-skirting, sexting (youth-produced sexual imagery), initiation/hazing type violence and rituals whether inside or outside School or online.

## Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

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, well-being, development, and ability to learn.

## Training

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

## Children who abuse other Children (Child on child Abuse)

For the purposes of this policy, “**peer-on-peer abuse**” is defined as abuse between children.

## School culture

The school prioritises cultivating a safe and respectful environment amongst pupils, and ensures that all pupils are aware that the school adopts a **zero-tolerance stance** on peer-on-peer abuse of any kind.

The school promotes respectful interactions amongst pupils, and all staff model appropriate and respectful behaviour. Staff will take care to avoid normalising harmful behaviour, particularly harmful sexual behaviour, e.g. by refraining from the use of phrases such as ‘boys will be boys’ or describing such behaviour as ‘just having a laugh’ or ‘part of growing up’.

The school will ensure that wider societal factors that exacerbate the problem of peer-on-peer abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, e.g. girls or LGBTQ+ pupils, or who are at increased risk of acting as a perpetrator in abusive situations, e.g. due to abusive home situations or anger management issues, are given additional support from an early stage.

The school manages all early help and intervention for pupils showing early signs of harmful behaviour, or early signs of being the victim of harmful behaviour, in line with the Child Protection and Safeguarding Policy.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

- It would be an expectation that in the event of disclosures about pupil on pupil abuse that all children involved, whether perpetrator or victim, are treated as being “at risk” and whatever the gender of those involved, all peer-on-peer abuse is unacceptable and will be taken seriously. Abuse is abuse and should never be tolerated or passed off as a ‘banter’, ‘just having a laugh’ or ‘part of growing up’.
- Staff are aware that ANY concerns relating to child on child abuse must be reported to the DSL and that staff have a responsibility to challenge all abusive behaviours between peers.
- All staff will be aware that peer-on-peer abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring.
- We recognise that children are capable of abusing their peers. As a school we work to minimise the risk of child on child abuse and will investigate and deal with any allegations robustly. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse (and any other children who may have been affected) and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion.
- It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse, verbal abuse (including ‘banter’, ‘just having a laugh’), sexual violence, sexual harassment, up-skirting, sexting, gender-biased issues and initiation/hazing type violence and rituals.
- Children who abuse others, when there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm’, will be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.
- In such incidences, the school will follow guidance and local procedures issued in relation to investigating and dealing with children who abuse others and recording outcomes. Referrals will be made to social care, CAMHS and / or police as and when appropriate. A strategy meeting and separate investigations for each child involved would be set up.
- Instances of sexual violence and sexual harassment will be taken seriously and responded to robustly. The school will adhere to guidance in section 5 of Keeping Children Safe in Education and follow the appropriate procedures.
- The school will ensure that staff are aware of the importance of understanding intra familial harms and will provide any necessary support for siblings following incidents.
- Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

Peer-on-peer abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm and this may also include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.

- Sexual harassment, including 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.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

### **Consensual and non-consensual sharing of indecent images and videos**

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts, e.g. the contents of the imagery, from the pupil(s) involved.
- Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the pupil or their parent in making a report.
- Unavoidable because the pupil has presented the image directly to a staff member or the image has been found on a school device or your school's network.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
- Discuss the decision with the Head or a member of the SLT.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Head or a member of the SLT.

- Make sure viewing takes place with another member of staff present in the room, ideally the Head or a member of the SLT. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the Head's office or a member of the SLT's office.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the pupil in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the school's Peer-on-peer Abuse Policy. Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

### **Children Missing from Education**

- All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect.
- We will follow the required procedures for unauthorised absence and for dealing with children who go missing from education, including appropriate notification to the Local Authority. We will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as **travelling to war zones, FGM and forced marriage. See Appendix 9 for more details.**

### **Anti-radicalisation / Prevent**

- The school supports the Prevent Strategy, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism. We have due regard to the need to prevent pupils from being drawn into terrorism or being radicalised.
- Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions.
- Extremism is defined as the holding of extreme political or religious views which may deny rights to any group or individual.
- We will ensure that staff are provided with appropriate training and information to enable them to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and identify any child who may be at risk and how to support them.
- We will also ensure that children are safe from terrorist and extremist material when accessing the internet in school. The school works within the curriculum to promote tolerance and respect for diverse views, while challenging prejudice of any kind. We are an inclusive school which values citizenship and a sense of belonging. Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.
- As with all matters pertaining to the maintenance of a safeguarding culture within the school, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.
- If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes. Concerns will be discussed with the child's parents whenever possible and advice would be sought from colleagues in LA (either Prevent co-ordinator or safeguarding services) if necessary.

## Homelessness

The DSL and deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

## Child Abduction and Community Safety Incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

## Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer.

Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

## Modern Slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## Pupils with Family Members in Prison

Pupils with a family member in prison will be offered pastoral support as necessary. Depending on the age of the pupil, they may receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

## Pupils Required to Give Evidence in Court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Depending on the age of the pupil, they may be provided with the booklet ‘[Going to Court](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## 22. Teaching Children How to keep Safe

We ensure that children are taught about safeguarding, including how to keep themselves safe online, through teaching and learning opportunities within our curriculum, PSHEE and relationships and sex education, how to stay safe, based on a wide view of what may happen to pupils, not only in School but also beyond it. We will ensure that the curriculum includes input about safe relationships and personal resilience, sexual education and health education and is in line with legislative changes which came into force for September 2020. This will also include staying safe online and the dangers of cyber-bullying and sexting – even if pupils in a particular faith community are not meant to use mobile phones or have limited access to the internet.

In planning curriculum input in relation to online safety we will ensure materials are differentiated to take account of the different ages, levels of understanding and vulnerabilities of our pupils so that all pupils are enabled to access this input effectively.

We acknowledge that as well as providing a variety of positive opportunities, the use of technology has become a significant component of many safeguarding issues and can provide the platform that facilitates exploitation of children and young people. The breadth of issues classified within online safety is considerable but can be categorised into three areas of risk:

CONTENT: being exposed to illegal, inappropriate or harmful material

CONTACT: being subjected to harmful online interaction with other users

CONDUCT: personal online behaviour that increases the likelihood of, or causes harm, such as the sending of explicit images or online bullying.

The first unit of PSHEE work for every class in every academic year focuses on how children can keep safe on the internet. The dangers of cyberbullying, grooming, abuse and radicalisation through online based resources are explored and explained in an age appropriate manner. Further information may be found in the PSHEE policy, but as a brief outline:-

- Lower School classes read and discuss storybooks together, including Jesse and Friends resources, *Digiduck's Big Decision* by Childnet and Kidscape, and *Chicken Clicking* by Jeanne Willis
- Middle School classes explore CEOP's *Lee and Kim* resources from the Thinkuknow website, including the film, song, storybook and poster
- Form V classes in Upper School examine and discuss the CEOP *Jigsaw* resource
- Form VI classes in Upper School watch and discuss *Let's Fight it Together* by Childnet.

The start-of-year PSHEE unit culminates in the children signing the Computing Agreement within their homework diaries, and having a homework task to discuss what they have seen and heard in class with their parents that evening: parents have been already informed about this in the start-of-year Welcome Evening and are asked to countersign the diary to show they have understood the agreement too, and agree to their children abiding by it both at home and in school.

We are aware of risks to children online and will ensure children are safeguarded in school from potentially harmful and inappropriate online material through appropriate filtering and monitoring systems. A permanent reminder of the key internet safety measures covered is displayed in poster form in every classroom from Form II upwards. Additional teaching input in safe and appropriate web surfing, including discernment of appropriate information following work on surf engines, is provided across the curriculum throughout the year whenever such activities are undertaken as part of ongoing schemes of work.

All year groups within the school engage in formal age-appropriate radicalisation awareness work in Citizenship lessons on an annual basis as well as part of on-going discussions in various other curriculum areas.

The school employs Open DNS Content Filtering that protects the network from Malware/Botware and Phishing sites, allows custom web content filtering and monitoring of internet site requests (websites looked up). The school also uses the Cisco Meraki wireless platform which monitors access to the school's WiFi and adds an extra layer of content filtering.



The Head and DSLs liaise with the Head of PSHEE regarding developments in the Prevent strategy, reviews all aspects of how children are taught about keeping safe on an annual basis and cascades refresher training to staff accordingly, making the appropriate resources available to teachers.

Date of policy: July 2007

Date of last review: July 2021

Updated: February 2022

Date of next review: September 2022

## The Designated Safeguarding Lead (DSL)

The DSL for the Prep School is Katy Pickford. The DSL for the Nursery is Richard McLelland.

### Job Description 2022/23

<b>Job Title:</b>	Designated Safeguarding Lead for Safeguarding & Child Protection (DSL)
<b>Accountable to:</b>	The Boards of Advisors and Directors, and the Local Authorities
<b>Role:</b>	The responsibilities and duties of the Designated Safeguarding Lead are as follows:

#### The broad areas of responsibility for the designated safeguarding lead are:

- to be alert to and recognise safeguarding issues and to raise and share concerns when appropriate;
- to know when to make referrals to social care when appropriate and ensure staff know how to contact the DSL about doing so;
- to manage referrals
  - Refer cases of suspected abuse that do not involve a staff member (except the Head) to local authority children's social care
  - Refer cases of suspected abuse that concern a member of staff to the Head and ensure he refers such cases to the local authority
  - Report cases where any member of staff is dismissed or leaves school due to risk and/or harm to a child to the Disclosure and Barring Service and, when appropriate, to the National College for Teaching and Leadership
  - Refer cases where a crime may have been committed to the Police
  - Support staff who make referrals to local authority children's social care
  - Refer cases to the Channel programme where there is a radicalisation concern
  - Support staff who make referrals to the Channel programme;
- liaise with the Head (and where appropriate the Board of Directors) to inform him or them of issues, especially ongoing "significant harm" enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.;
- to co-ordinate the Child Protection procedures in the School and act as a source of support, advice and expertise to staff (especially pastoral support staff, the Head of Media and Computing Resources and SENCOs) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- as required to liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies (the three safeguarding partners) in all matters of child protection, including keeping children safe on-line;
- to speak to parents, carers or child about any concerns if required;
- to advise and act upon all concerns, belief and evidence of abuse reported to them;
- to share information with others where necessary and keep the Head informed of all actions or issues, especially ongoing enquiries by the LA, unless the Head is the subject of the complaint;
- to ensure that good records are maintained;
- to monitor records of pupils in the school who are subject to a child protection plan to ensure that it is maintained and updated as notification is received;
- to liaise with other professionals when appropriate in respect of children in need and contribute to the multi-agency working (Team Around the Child) and any plans, meetings and decisions about a child if necessary;
- to recognise the importance of safer recruitment and ensure the implementation of safer recruitment practices;
- to recognise the importance of staff conduct and challenge poor practice in the workplace;
- to ensure that the Single Central Register is complete and fully up-to-date

- to ensure that appropriate on-line safety precautions and education are being implemented.

## **Training**

The Designated Safeguarding Lead (and any deputies) receives appropriate training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSL will undertake Prevent awareness training. Training provides DSLs and their deputies with a good understanding of their own role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of information sharing, both within School and with the three safeguarding partners, other agencies, organisations and practitioners;
- ensure each member of staff receives regular training with due regard to the recommendations detailed in the most recent publication of KCSIE;
- ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- monitor the keeping of detailed, accurate, secure written records of concerns and Referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them;
- ensure on-line safety training, both for self and others, is updated regularly and that all staff understand the unique risks associated with online safety and are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- arrange mental health awareness training, both for self and others, is updated regularly;
- understand how to identify children at risk of radicalisation and how to support them with regard to the requirements of the Prevent duty;
- ensure that any member whose role requires it is trained in safer recruitment.

## **Raising Awareness**

The Designated Safeguarding Lead ensures the School's policies are known and used appropriately in the following way:

- working with the Head and the Board of Directors, ensure the School's Safeguarding and Child Protection policies are reviewed annually and the procedures are implemented, updated and reviewed regularly;
- ensuring that the School's child protection policies are known, understood and used appropriately;
- ensuring the Child Protection policies are available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- liaising with the local authority to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- ensuring Child Protection files of pupils who have left the School are transferred securely to the new School as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained;
- ensuring that, where appropriate, relevant safeguarding enquiries are made for pupils joining the School;

- encourage a culture of openness where concerns are openly discussed and consideration is constantly given to improving and developing safeguarding practice
- helping to promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing or have experienced with teachers and the SLT. This will assist in ensuring that staff know who the children are, they understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

### **Child protection file**

Where children leave the School the DSL must ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs are aware as required.

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

### **Availability**

During term time the DSL (or a deputy) should always be available (during school hours) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

The Designated Safeguarding Lead (DSL) has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

## The Deputy Designated Safeguarding Leads (DDSLs)

### Job Description 2022/23

**Job Title:** Deputy Designated Safeguarding Lead for Safeguarding & Child Protection (DDSL)

**Accountable to:** The Designated Safeguarding Lead, the Boards of Advisors and Directors, and the LAs

**Role:** The responsibilities and duties of the Deputy DSL are as follows:

Deputy Safeguarding Leads are trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, **the ultimate lead responsibility for child protection remains with the DSL** and will not be delegated except in extreme circumstances where the DSL is unable to carry out their duties.

#### The broad areas of responsibility for the deputy designated safeguarding leads are:

- to be alert to and recognise safeguarding issues and to raise and share concerns when appropriate;
- to know when to make referrals to social care when appropriate and ensure staff know how to contact the DSL about doing so;
- to manage referrals in the absence of the DSL
  - Refer cases of suspected abuse that do not involve a staff member (except the Head) to local authority children's social care
  - Refer cases of suspected abuse that concern a member of staff to the Head and ensure he refers such cases to the local authority
  - Report cases where any member of staff is dismissed or leaves school due to risk and/or harm to a child to the Disclosure and Barring Service and, when appropriate, to the National College for Teaching and Leadership
  - Refer cases where a crime may have been committed to the Police
  - Support staff who make referrals to local authority children's social care
  - Refer cases to the Channel programme where there is a radicalisation concern
  - Support staff who make referrals to the Channel programme;
- liaise with the DSL and Head (and where appropriate the principal on behalf of the Board of Directors) to inform him or them of issues, especially ongoing "significant harm" enquiries under section 47 of the Children Act 1989 and police investigations;
- to assist the DSL in co-ordinating the Child Protection procedures in the School and act as a source of support, advice and expertise to staff (especially pastoral support staff, the Head of Media and Computing Resources and SENCOs) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- as required, in the absence of the DSL, to liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- in the absence of the DSL, to be the point of contact for parents, pupils, teaching and non-teaching staff and external agencies (the three safeguarding partners) in all matters of child protection, including keeping children safe on-line;
- in the absence of the DSL to speak to parents, carers or child about any concerns if required;
- in the absence of the DSL to advise and act upon all concerns, belief and evidence of abuse reported to them;
- in the absence of the DSL to share information with others where necessary and keep the Head informed of all actions or issues, especially ongoing enquiries by the LA, unless the Head is the subject of the complaint;
- to ensure that good records are maintained;
- to monitor records of pupils in the school who are subject to a child protection plan to ensure that it is maintained and updated as notification is received;
- in the absence of the DSL or where otherwise appropriate to liaise with other professionals in respect of children in need and contribute to the multi-agency working (Team Around the Child) and any plans, meetings and decisions about a child if necessary;
- to recognise the importance of safer recruitment and ensure the implementation of safer recruitment practices;
- to recognise the importance of staff conduct and challenge poor practice in the workplace;

- in the event of an extended absence of the DSL to ensure that the Single Central Register is complete and fully up-to-date
- to ensure that appropriate on-line safety precautions and education are being implemented.

## **Training**

The Deputy Designated Safeguarding Leads receive appropriate training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DDSLs will undertake Prevent awareness training. Training provides DDSLs and their deputies with a good understanding of their own role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of information sharing, both within School and with the three safeguarding partners, other agencies, organisations and practitioners;
- assist in ensuring each member of staff receives regular training with due regard to the recommendations detailed in the most recent publication of KCSIE;
- assist in ensuring each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- assist in monitoring the keeping of detailed, accurate, secure written records of concerns and Referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them;
- assist in ensuring on-line safety training, both for self and others, is updated regularly and that all staff understand the unique risks associated with online safety and are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- assist in arranging mental health awareness training, both for self and others, is updated regularly;
- understand how to identify children at risk of radicalisation and how to support them with regard to the requirements of the Prevent duty.

## **Raising Awareness**

The Deputy Designated Safeguarding Leads ensure the School's policies are known and used appropriately in the following way:

- working with the DSL and Head to review the School's Safeguarding and Child Protection policies and ensure that the procedures are implemented, updated and reviewed regularly;
- assist the DSL in ensuring that the School's child protection policies are known, understood and used appropriately;
- in the absence of the DSL, ensuring Child Protection files of pupils who have left the School are transferred securely to the new School as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained;
- in the absence of the DSL, ensuring that, where appropriate, relevant safeguarding enquiries are made for pupils joining the School;
- encourage a culture of openness where concerns are openly discussed and consideration is constantly given to improving and developing safeguarding practice

- assist the DSL in helping to promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing or have experienced with teachers and the SLT. This will assist in ensuring that staff know who the children are, they understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

### **Availability**

During term time the DDSLs, in the absence of the DSL, should always be available (during school hours) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DDSL would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

The DDSLs have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff in collaboration with the DSL.

### Guidance regarding potential signs of abuse from London Safeguarding Board procedures.

#### Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

#### Bruising

Children can have accidental bruising, but the following must be considered as non accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

#### Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

#### Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.



## **Fractures**

Fractures may cause pain, swelling and discoloration over a bone or a joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

## **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

## **Behavioural Indications**

Some children may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others

## **Recognising Emotional Abuse**

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

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

## **Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause

- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

## **Recognising Sexual Abuse**

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

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

## **Hurlingham School and Hurlingham Nursery Safeguarding and Child Protection Protocol and Procedures including Guidance for staff on suspecting or hearing a complaint of abuse**

The Designated Safeguarding Leads are:	Kary Pickford (Prep School) Richard McLelland (Nursery)
The Deputy Designated Safeguarding Leads are:	Simon Gould Sarah Sinclair (EYFS – Prep School) Gemma Kirk (Nursery)
The member of the Board of Directors with responsibility for Safeguarding is:	Fiona Goulden

All staff members have a statutory responsibility to safeguard and promote the welfare of all pupils at all times.

If you have a concern about a pupil or you receive information that leads you to be concerned that a pupil has been harmed or is at risk of harm or their welfare is being compromised you are required to act appropriately to ensure action can be taken to protect the pupil concerned.

The concern may be as a result of a disclosure from a pupil, a parent or a third party or may arise due to behaviour that has caused you to become concerned.

**If a pupil discloses abuse please note the following key points:**

- **Listen carefully to what the pupil is telling you without interrupting**  
Stay calm and sympathetic. Listen to what you are told without displaying shock or disbelief. Be observant and attentive without being judgmental. Do not probe or put words into the child's mouth – accept what is said. Reassure the child that it was right to tell, that you are sympathetic, that they are not alone, that you are glad they spoke up.
- **Do not promise confidentiality**  
Do not make promises that you may not be able to keep such as "everything will be alright" or "I won't tell anyone". Do not promise confidentiality to adults or children. (You have a duty to refer).
- **Remain non-judgemental and keep an open mind**
- **Do not ask leading questions, or more questions than you have to – just establish what the pupil is telling you**  
Respond calmly and openly. Do not ask leading questions (such as "What did he do then?") or interrogate. Ask open questions that will encourage a secure and sympathetic environment for the child, such as "Anything else to tell me?" "Yes?" "And?"  
Do not criticise the perpetrator or be judgmental.  
Do not ask the child to repeat it all for another member of staff.
- **Be honest with the pupil and explain what will happen next**  
Explain what you have to do next and who you have to talk to (the DSL or Head). Keep in contact with the pupil and, if a Children's Specialist Services interview is to follow, see that the child has a "support person" present if they wish (This may be you).
- **Keep a sufficient written record of the conversation.**  
Make detailed notes, preferably after the disclosure, and whenever appropriate check them with the child. Use the child's own words, not your interpretation. It is recommended that you don't take notes during the disclosure as this may inhibit the child – it is better if possible to write notes as soon as practical after the meeting. Notes written up to one hour after the disclosure may be treated as contemporaneous and used in court.

Sign and Date the notes and give them to the DSL to sign and keep). It may also be appropriate to detail any signs of injury on a body map which is available from the DSL.

The record should include:

- (a) the date and time;
- (b) the place of the conversation; and
- (c) the essence of what was said and done by whom and in whose presence.

The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Person as soon as possible. The record of what was said by the child should as far as possible be in her own words and not in the adult's reinterpretation of those words.

In the case of concerns always record the information clearly and be clear how the concern has arisen. All evidence, for example, scribbled notes, mobile phones containing text messages, clothing and computers, must be safeguarded and preserved and passed to the Designated Person. Computers or other devices that might contain relevant evidence should not be searched or accessed by the member of staff hearing the complaint.

- **Pass on to the Designated Safeguarding Lead (DSL)**

Inform the Designated Safeguarding Lead for Safeguarding (DSL) immediately if the information you have indicates that the pupil has suffered harm or there is a high level of risk.

In all other instances concerns should be passed on to the DSL at the as soon as possible – do not delay.

Any situations where a crime has been committed must be reported to children's social care or the police immediately but at most within 24 hours.

**Please remember the DSL is available to offer help, advice and guidance to staff and pupils where necessary. If you have a concern or problem and are unclear how to proceed ask for advice.**

**In all cases ensure ongoing support is offered to the pupil as appropriate.**

**Achieving the best evidence:**

- Walk and talk, literally or metaphorically
- Get alongside the child – literally
- Do it immediately
- Listen very carefully
- Allow them to speak freely
- Do not ask leading questions
- Do not make assumptions
- **Focus on establishing: WHAT, WHEN, WHERE, WHO?**

**DO:**

- Try to be available to be spoken to. The child may not be ready when you are.
- Listen carefully to what the child says without interpreting.
- Keep an open mind about what you are told.
- Believe the child, even if you cannot see any injury which would support the story.
- Refer on ASAP, via DSL.
- Be prepared to speak to the Police or Children's Specialist Services

**DON'T:**

- Promise confidentiality.
- Pre-judge or make assumptions.
- Ask leading questions, or ask any more questions than you have to – just establish what the child is telling you, then stop.
- Record the conversation.
- Delay referral.
- Be afraid of being wrong.

**All staff are reminded that:**

Schools are not an investigative agency. That is the job of the Police and Children's Specialist Services.

## **Reporting Concerns about pupils**

If a member of staff has any concern about a pupil's welfare, they will act on them immediately by speaking to the DSL or deputy DSL(s). All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL(s) with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## **Managing referrals**

The reporting and referral process outlined in flow chart below in this Appendix will be followed accordingly.

All staff members, in particular the DSLs, will be aware of the LA's arrangements in place for managing referrals. The DSLs will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the

police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

### **Children in Need**

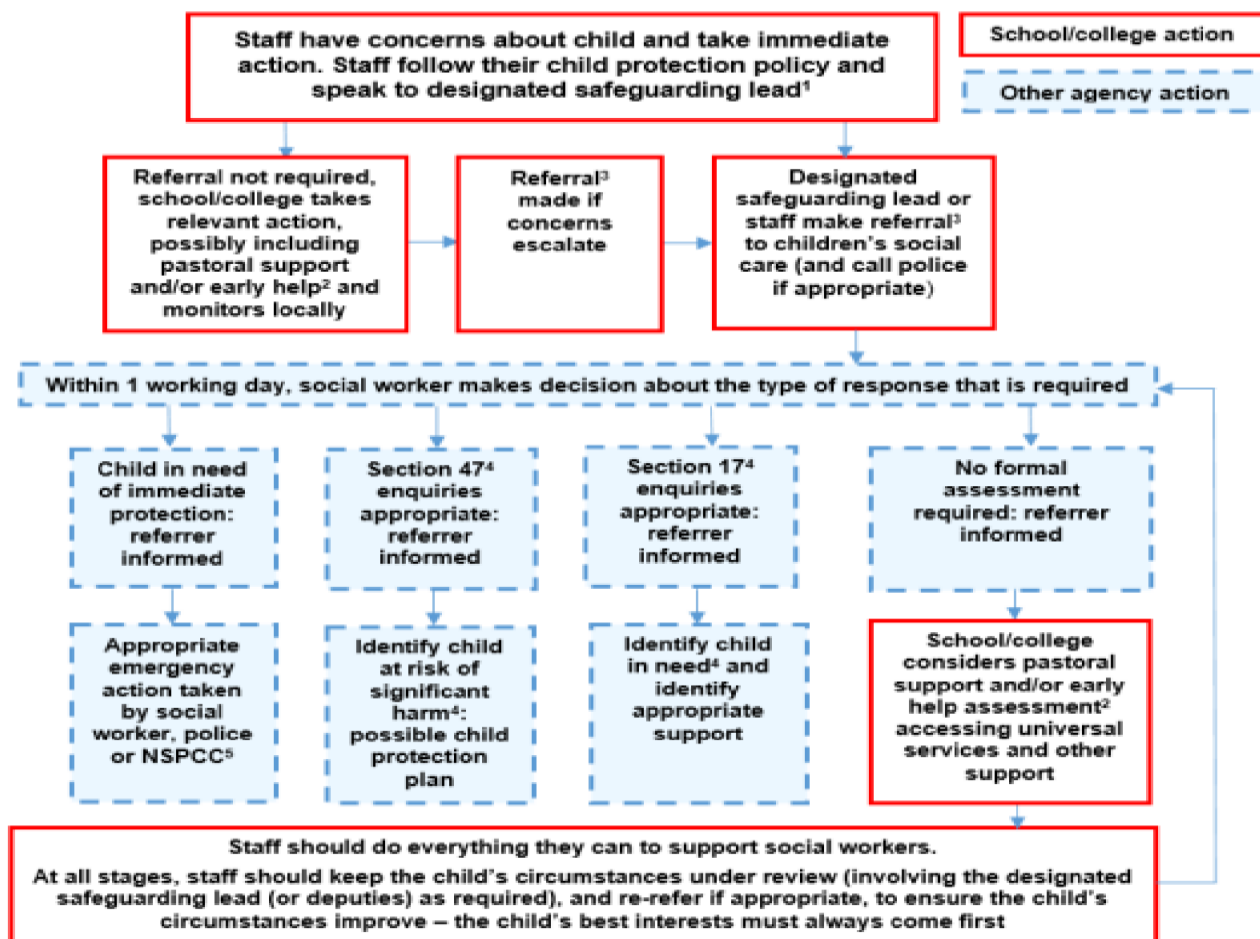
A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local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

### **Children Suffering or Likely to Suffer Significant Harm – Child at Risk**

LAs, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, FMG, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

## Referral Flow chart

### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Safeguarding recording and record keeping guidance for schools

This guidance is intended to support effective recording of key (significant) events for pupils, safeguarding concerns and Child Protection issues.

The importance of accurate recording is generally well understood by staff members but advice is frequently requested in respect of this issue.

### Significant life events

Some key events in a child or family can have a significant impact and it is essential that these are clearly recorded on the child's file. An example of a significant event would be the death of parent, sibling or other close family member. Unnecessary distress can be caused to a child or parent if such significant information is overlooked or not known, so it is important that it is recorded in such a way as to be accessible to other members of staff who may be working with the child or in a position where they may be required to contact the family.

### Key information

Schools need to have key information about pupils recorded and regularly updated. This information should include basic details such as

- which adults have Parental Responsibility for a child
- contact details for parents and any other nominated adults who can be contacted in case of emergency – it is advised that schools ask for **three contact numbers** for each child – one of which should be a trusted adult who the parent agrees can be contacted in an emergency but who does not live at the home address
- which adults the child lives with (especially in situations where parents do not live together) and contact arrangements if relevant
- any legal orders in place, particularly any which affect the care of the child
- any information which may impact on the safety of the child – eg adults who pose a risk to a child or are not permitted contact; Domestic Abuse issues etc
- details of any key professionals working with the child

### Child Protection / safeguarding concerns

Many schools have specific proforma for the recording of Child Protection (CP) / safeguarding concerns. These can be very useful as they guide staff members by the completion of certain fields / questions and ensure that key information needed is not missed. Some use a coloured paper so that they are easily recognisable. Whatever the system in place it is essential that all staff are aware of the requirement to complete recording of CP / safeguarding concerns and given guidance about distinguishing between fact and opinion. An example proforma is attached – app 3

Schools are increasingly using computerised safeguarding recording systems (eg CPOMS or My Concerns) and these are generally proving to be positive in enabling effective recording and facilitating retrieval of information when needed. Guidance given to staff about good and effective recording should be the same whether they are writing it on paper or typing it into a computer system.

If injuries have been seen these should be recorded as accurately as possible, giving a clear description of the marks seen and their location.

If a disclosure has been received from a child this should be recorded using the child's own words, rather than an interpretation of what was said.

If the concern is as a result of third party information received this must be made explicit.

CP notes should be dated and signed by the member of staff who noted the concern or received the initial information about the issue.



Designated Safeguarding Leads should record when the information was received and any discussion had with parents, other staff members or professionals from other agencies, the identity of the other professional (eg name of duty social worker) and clearly note any decisions or actions agreed. This includes recording the reasons for a decision not to make an external referral if this is relevant.

Copies of referrals made to external agencies should be kept in the child's individual confidential record, alongside minutes of any meetings held, letters, e-mails etc.

Please remember when referrals are made it is important to include

- basic family details with contact details for the parents
- whether parents have been informed / consent to the referral
- if the concerns have not been discussed with the family why this is - usually only in cases where to do so may place the child at further immediate risk; where the parent is believed to have been responsible for / colluded in the child being sexually abused; or if all attempts to contact the parent have failed
- a clear explanation of your concerns and what actions you have already taken (if applicable)

Many safeguarding and / or CP concerns will not rely on a single incident or injury and will arise as a result of a series of smaller incidents, concerns and issues which build a picture that becomes more concerning over a period of time. It is therefore really important to ensure that a log of concerns is kept which will support effective decision making and (when necessary) referrals which provide clarity and evidence - based concerns.

It is advised that all designated staff keep a single record / log to note all pupils for whom they have a safeguarding file (example attached app 1), which logs basic details, status etc

It is also advisable to record a brief risk assessment for each pupil for whom school has CP concerns as this informs the level of risk / concern and what actions may need to be taken, (example attached app 2). For some pupils where there are complex concerns / high levels of concern related to risk, a more detailed risk assessment may be required.

### **Confidentiality**

Records can be paper files or computerised. What is important is that CP information is recorded and kept securely, with access to particularly sensitive information restricted where necessary.

When passing on sensitive or confidential information to other agencies please ensure this is done in a secure manner.

### **Transfer and retention of records**

When pupils leave your school any CP / safeguarding information / records must be passed on to the receiving school (once confirmed) in a secure way and confirmation of receipt should be obtained.

Safeguarding and CP information is regarded as personal information and you do not necessarily need consent to share this. Generally, families should be made aware that information will be shared with a new school, what will be shared, with whom and why. If it is not reasonable to do this, or by doing so a child or young person's safety could be put at risk information can be shared.

Guidance as to whether copies of CP / safeguarding files should be retained in the originating school is not absolute, but local practice has been developed and it is recommended that schools seek advice from the Local Authority (or their legal provider if relevant).

In Wandsworth, therefore, we recommend that key CP / safeguarding records are copied and one copy is retained in the originating school. It is immaterial whether original is retained and copy sent or vice versa

It is fine to retain either paper or electronic records so if there is shortage of filing space records can be scanned and retained electronically – some schools have chosen to do this – however if there are **original signed notes relating to a serious disclosure** it is advisable to retain the paper copy as these could be required

The computer systems that are on the market have facilities to transfer the data to other schools. At the time of writing, this does not mean that the data is transferred, it simply means that the previous school relinquish access, and access rights are transferred to the new school; the data is kept intact. If unsure please check with your provider.

Records should be retained 'long term, until the child is 25 years of age or older, then reviewed. IRMS guidance states that records should be retained for a longer period in 'instances where detailed information about activities in school may form an important part of safeguarding for that individual'.

This guidance is included in Government guidance: [Data protection: toolkit for schools](#) and the annual review checklist.

In addition, since the Independent Inquiry into Child Sexual Abuse (IICSA) was established, organisations should not destroy any records that might be relevant. Since we may not know at the time which records may be relevant, this provides justification for retention. Judicial review also supports this stance.

Schools should update their data audit log to reflect their retention period for these records

### **Allegations against staff and volunteers**

Please note that any concerns of a safeguarding nature / allegations against staff and volunteers must be **recorded and retained**. These matters need to be treated as confidentially as possible and the records kept securely.

The records should include

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of child(ren) concerned
- how the matter was investigated
- action taken
- consultation with LADO / advice given
- outcome of above
- risk assessment
- safeguarding measures put in place
- minutes of ASV meeting (if held)
- details of any disciplinary action / hearing (where relevant)
- outcome of police involvement (where relevant)
- final LADO outcome note

Details of how an issue was investigated and the outcomes should not be included on the child's file (as details of the staff member or volunteer need to be protected. Brief reference should be put on child's file so that records can be cross referenced if required at a later stage. We need to recognise that there is an increase in non-recent allegations and good recording keeping supports any current investigations immeasurably.

### **Child on child abuse**

Similar guidance should be followed where there have been instances of child on child abuse or concerns reported about concerning or possibly abusive behaviour between pupils whether inside or outside School or online. ie

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of child(ren) concerned
- how the matter was investigated

- action taken
- risk assessment
- safeguarding measures put in place
- consultation with Safeguarding in Education Advisor / advice given
- contact with Children's Social Care
- contact with police (if relevant)

The relevant information should be recorded and retained on records for **both pupils** as well as copies of any referrals made.

## Pupils of concern list

name	Dob / class	Status e.g <i>CLA</i> ; <i>subject to CP</i> <i>plan</i> ; <i>CiN</i> ; <i>privately</i> <i>fostered etc</i>	Nature of concern e.g <i>domestic abuse</i> ; <i>CP concerns</i> ; <i>self-</i> <i>harming</i> ; <i>victim of</i> <i>bullying etc</i>	Other agencies / professionals involved eg <i>EWO</i> ; <i>EP</i> ; <i>school</i> <i>nurse</i> ; <i>social care etc</i>

## Safeguarding Risk Assessment (Individual Pupil)

Name

Date of birth

Class / tutor group

Date of assessment

Carried out by

Reason for risk assessment

*Category: personal safety / emotional safety / physical safety / other*

Identifying the risks / evidence of concern

Assessing the risk

**LOW**

**MEDIUM**

**HIGH**

Actions being taken / reducing the risk

Other professionals involved

Logged on system (date )

## Safeguarding concern report

Name

Dob / class / tutor group

Reason for concern

*eg disclosure by child; behaviour observed; injury noted etc*

Details of concern

Is parent / carer aware of concern?

Name of member of staff reporting concern

Date

Received by DMS

Date

**Actions to be taken**

### School report to Child Protection Conference or Looked After Child review

<b>School</b>	
<b>Name of child</b>	
<b>Date of birth</b> <b>Year group</b>	
<b>Name of Form teacher/ Head of Section</b>	

*When completing the sections below consider issues such as attendance and punctuality; preparation for school / learning; general appearance; emotional presentation and wellbeing; indicators that child may have suffered harm / be at risk of harm; disclosures made by child; behaviour and social development; relationships with peers and adults; academic progress/ areas requiring improvement; contact with family; etc*

What is working well?	What are we worried about?

<b>What needs to happen?</b>

<b>Signature</b>	
<b>Print name</b>	
<b>Date</b>	

**Reports should be shared with families prior to the meeting except in exceptional circumstances**  
Please send this report wherever possible at least 5 days in advance of the relevant meeting to [Childrensplanning@wandsworth.gov.uk](mailto:Childrensplanning@wandsworth.gov.uk) and bring copies for those attending the meeting.



## **Guidance for schools re children who abuse other children (Child on child Abuse)**

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this document 'child' refers to any child or young person up to the age of 18 years

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse, verbal abuse.

When dealing with such allegations, professionals should be mindful that there is significant research evidence to suggest that children who behave in a sexually inappropriate and / or aggressive way towards other children are often victims of abuse themselves.

There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

### **Process**

When an instance of child on child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, a referral should be made to children's social care in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

Where the allegation relates to an incident that took place within the school, or relates to pupils attending the same school the school should

- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident (s)
- Keep a detailed log of actions, discussions and decisions
- Carry out a risk assessment and put a risk management plan in place if necessary – ensure that non teaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening ,comments
- Contact parents where possible (unless advised otherwise, or serious concern re further risk to child or in particularly complex situations eg sexual exploitation – in these instances seek advice)
- Consider whether the situation warrants information being shared with other parents in the school (eg where press coverage is likely) and seek advice

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (eg related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)

- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

In such cases the needs of each child should be separately considered by social care. In cases where a significant incident has occurred or the alleged incident is of a serious nature the usual process will involve a separate strategy meeting in respect of each child, and s47 enquiries initiated, which will involve discussion with police (CAIT). Different social workers should be allocated for the child who is the victim and the child who has harmed, even if they are living in the same household. Police will decide whether an alleged offence should be subject to criminal investigation.

If the investigation / assessment concludes that the allegations are substantiated, the children should not necessarily be expected to continue their education in contact with each other. The child (ren) responsible for the abuse should be moved if necessary. The views and wishes of the child who has been abused and their parents should be appropriately considered in the decision making.

Once initial actions have been taken and processes are in place consideration should be given to the provision of ongoing support / counselling for the children involved, where appropriate / necessary.

Additional guidance is available via the London Child Protection procedures

[http://www.londoncp.co.uk/chapters/ch\\_harm\\_others.html](http://www.londoncp.co.uk/chapters/ch_harm_others.html)

## Guidance for schools re child on child sexual violence and sexual harassment

### Victims and alleged perpetrators

There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. For the purposes of this advice, we use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

We also use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised terms and the most appropriate to aid effective drafting of advice. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Schools need to make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Children need to understand that sexual violence or sexual harassment will not be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys" and that challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts will not be tolerated as this risks normalising such behaviour.

We understand that such behaviours may reflect wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why a whole school/college approach (especially preventative education) is important.

Some pupils (eg those with SEND, or those who are LGBT) can be particularly vulnerable. Schools also need to be aware that staff can also be victims of sexual violence or harassment and have strategies to protect staff

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person with his penis, that person does not consent to the penetration and he does not reasonably believe that they have consented.

**Assault by Penetration:** A person commits an offence if: s/he intentionally penetrates the vagina or anus of another person with a part of her/his body or anything else, the penetration is sexual, that person does not consent to the penetration and s/he does not reasonably believe that they have consented.

**Sexual Assault:** A person commits an offence of sexual assault if: s/he intentionally touches another person, the touching is sexual, that person does not consent to the touching and s/he does not reasonably believe that they have consented.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 **can never consent** to any sexual activity;
- the age of consent is 16. However, it is recognised that between the ages of 13 and 16 sexual activity may be considered by the young people to be consensual. In cases where the sexual activity is mutually agreed and non-exploitative then it is not intended to instigate criminal proceedings. An assessment against risk factors should be carried out to assist in decision making in relation to safeguarding
- sexual intercourse without consent is rape.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- upskirting (which is now a criminal offence under the Voyeurism Offences Act 2019) – this typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone, including pupils and staff, of any gender can be a victim of upskirting.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

Preventative programmes should be developed to be age and stage of development appropriate and tackle such issues as

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment.

Responding Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and

effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any report.

Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as children's social care and the police as required.

Disclosures from children should be dealt with sensitively in line with guidance about any safeguarding disclosures. The child should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

The wishes of the victim in terms of how they want to proceed should be taken into account. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how things are being taken forward.

Additional guidance is available in Part 5 of KCSiE 2021 and

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

## Children Missing from Education

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

Local Authorities (LA) have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. This requires a co-ordinated approach across schools, relevant LA sections and other agencies to ensure good monitoring systems are in place.

A child going missing from education is a potential indicator of abuse or neglect. The school will follow their established procedure for unauthorised absence and for following up children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future.

The school has both an admissions register and an attendance register, and all pupils are placed on both registers (unless pupils are boarders). Pupils must be entered on the admissions register at the beginning of the first day on which the school has agreed or been notified that the pupil will attend the school. If the pupil fails to attend the school will undertake reasonable enquiries to establish their whereabouts.

The school will make reasonable enquiries (jointly with the LA) to establish the whereabouts of a pupil who ceases to attend, before deleting the child from roll if the deletion is under regulation 8(1), sub paragraphs (f)(iii) and (h)(iii) (see table below)

The school will always inform the LA of any pupil who is going to be removed from the admission register under any of the grounds listed in the regulations (see table below)

The notification will include:

- a) The full name of the pupil
- b) The full name and address of any parent with whom the child usually resides
- c) At least one telephone number of the parent
- d) The pupil's future address and destination school (if applicable)
- e) The ground in regulation 8 under which the pupil's name is to be removed

The notification should be made as soon as the grounds above are met and prior to removal. This is essential so that the LA can take appropriate follow up action when required.

The school will also notify the LA within 5 days of adding a pupil's name to the admission register at a non-standard transition point. The notification will include all the details included in the admissions register. The school will also provide information about pupil admissions at standard transition points if requested to do so by the LA.

In line with the safeguarding duties of the school, all unexplained pupil absences will be investigated. The school must inform the LA of any pupil who fails to attend school, or has been absent without permission for a continuous period of 10 school days or more.

Established procedures will be followed, but each case needs to be treated on its own merits, taking into account all the facts of the case. Some children are at particular risk, and may also need referral to social care.

<b>Grounds for deleting a pupil of compulsory school age from the school admission register set out in the Education (Pupil Registration) (England) Regulations 2006, as amended</b>	
1	8(1)(a) - where the pupil is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the local authority for that named in the order or the order is revoked by the local authority on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.
2	8(1)(b) - except where it has been agreed by the proprietor that the pupil should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that he has been registered as a pupil at another school.

3	8(1)(c) - where a pupil is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that he has ceased to attend the school and the proprietor of any other school at which he is registered has given consent to the deletion.
4	8(1)(d) - in a case not falling within sub-paragraph (a) of this paragraph, that he has ceased to attend the school and the proprietor has received written notification from the parent that the pupil is receiving education otherwise than at school.
5	8(1)(e) - except in the case of a boarder, that he has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which he is registered.
6	8(1)(f) - in the case of a pupil granted leave of absence in accordance with regulation 7(1A), that — (i) the pupil has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted; (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
7	8(1)(g) - that he is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.
8	8(1)(h) - that he has been continuously absent from the school for a period of not less than twenty school days and (i) at no time was his absence during that period authorised by the proprietor in accordance with regulation 6(2); (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor of the school and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
9	8(1)(i) - that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the pupil will return to the school at the end of that period.
10	8(1)(j) - that the pupil has died
11	8(1)(k) - that the pupil will cease to be of compulsory school age before the school next meets and (i) the relevant person has indicated that the pupil will cease to attend the school; or (ii) the pupil does not meet the academic entry requirements for admission to the school's sixth form
12	8(1)(l) - in the case of a pupil at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a pupil of the school
13	8(1)(m) - that he has been permanently excluded from the school
14	8(1)(n) - where the pupil has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school
15	8(1)(o) where— (i) the pupil is a boarder at a maintained school or an Academy; (ii) charges for board and lodging are payable by the parent of the pupil; and (iii) those charges remain unpaid by the pupil's parent at the end of the school term to which they relate

## Policy on Procedures When a Member of Staff, Volunteer, Contractor, Child Protection Officer or Head Faces Allegations of Abuse

This policy is made available to all staff at Hurlingham School.

### 1. Introduction

The most recent guidance on this issue is to be found in Part 4 of Keeping Children Safe in Education (September 2021).

Working Together to Safeguard Children (August 2018) requires local authorities to designate an officer or team of officers to deal with the management and oversight of allegations against people who work with children.

Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

We will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. We undertake to take any allegation of abuse, involving a member of staff, very seriously

The member of staff who is informed of the allegation must:

- Record the information (it may be more appropriate to do this immediately after the meeting depending on the state of the person making the allegation). This need only be the bare facts and a synopsis of what was actually said.
- Do not grill the person making the allegation.
- Do not promise to keep it confidential.

An allegation of such seriousness must normally be made directly to the Child Protection Officer (DSL); but if another member of staff, preferably the Head, is told first, he/she must ensure that the DSL is informed immediately.

If the DSL is unavailable the Head or DSL for Early Years should be told at once.

If the DSL is involved then the referral should be made direct to the LADO.

The DSL will tell the Head unless he is personally involved in the allegation.

Where there is a conflict of interest in reporting the allegation to the Head staff will report the concern directly to the LADO. Information regarding the identity of the LADO can be found on the LA's website or on page 5 of this policy.

*Please note that from October 2016 a new system is in place in Wandsworth for making referrals when allegations are made against professionals. Their referral form (located in the Policy Documents folder on the Hurlingham School Office drive) should be completed and e-mailed to MASH (as per information on the form).*

*It will still be referred to the duty LADO for decision, but it has been agreed that all referrals should come through the 'front door' as this enables any issues for a child who may be at risk of significant harm to be assessed promptly in MASH and processes put in place if necessary in parallel with the LADO investigation (when required). The LADO office can still be contacted for advice if needed (020 8871 7208) and the duty LADO will either speak to you straightaway or call you back as soon as possible.*



When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

## **2. The First Response**

The Head will first try to establish and record the following information before contacting the Local Authority's designated officer on **Tel: 020 8871 7961** (or in the most serious cases, the police) which he will do without delay.

- Who made the allegation and the nature of it.
- When and where it happened.
- Who was involved.
- Whether there were witnesses and who else knows.
- Any past history and/or relevant documentation.

When the Head contacts the EWO they will discuss whether it is appropriate given the circumstance of the individual allegation to:

- Tell the pupils' parents; in which case the Head will inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents, in which case we will contact the Children's Specialist Services (previously Social Services) before making contact.
- Tell the member of staff about whom the allegation has been made and if so will advise him or her to contact their Trade Union or Professional Association for advice and support,
- To involve Children's Services or the Police
- To suspend the member of staff involved
- If the matter should be dealt with through the internal disciplinary process

Once informed, the EWO and the Local Authority Designated Officer (LADO) are effectively in charge of managing the allegation but the Head is responsible for looking after the interests of the School.

The School will not undertake an investigation into the allegations without prior consultation with the local authority designated officer or team of officers (LADOs), or in the most serious cases, the police, so as not to jeopardise statutory investigations.

## **3. The Next Step**

Although a formal investigation is a matter for specialists, where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, we will always:

- Invite the police to conduct the investigation,
- Consider suspending the member of staff (or volunteer) concerned.

If the matter is handed back to the School to manage:

The Head must take appropriate action within 3 working days and the disciplinary hearing must be held within 15 working days unless further investigation is required in which case this should be completed within 10 days. Following completion of the further investigation, the Head will decide whether to hold a disciplinary hearing within 2 working days and must hold it within 15 working days.

## **4. Support for the Pupil**

Our priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The Head, together with the Principal who is the school's Child Protection Officer (DSL), will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians and the Wandsworth Safeguarding Children Partnership (WSCP). The

WSCP is a new organisation launched on 12 July 2019, jointly led by the Police, Clinical Commissioning Group and the Council. They are responsible for protecting children and young people in Wandsworth from harm, abuse, neglect and exploitation, and promoting their welfare.

## **5. Suspension**

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step, and we will take legal advice beforehand, and will normally only suspend a member of staff where:

- There is a serious risk of harm (or further harm) to the child,
- The allegations are so serious as to constitute grounds for dismissal, if proven,
- The police are investigating allegations of criminal misconduct.

We recognise fully that we have a duty of care towards all of our staff, and we will always:

- Keep an open mind until a conclusion has been reached.
- Interview a member of staff before suspending him or her.
- Keep him or her informed of progress of the investigation.

Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a friend or Trade Union representative.

## **6. Alternatives to Suspension**

We will always consider whether an alternative to suspension might be appropriate.

Possibilities include:

- Sending the member of staff on leave,
- Giving him or her non-contact duties,
- Ensuring that a second adult is always present in the classroom when he or she teaches.

## **7. If the Member of Staff Resigns**

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. Our policy is always to complete every investigation into allegations of child abuse.

## **8. Compromise Agreements**

The policy at Hurlingham school is to follow the DCSF guidance set out in "Safeguarding Children and Safer Recruitment in Education" on the use of compromise agreements in cases of child abuse which is:

*"Compromise agreements, by which a person agrees to resign, and a school... ... agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases. In any case, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the Children's Barred List where circumstances require it"*

## **9. Length of Investigatory Process**

We recognise that everyone's interests are served by completing any investigatory process as swiftly as possible. Hurlingham School is a small community and we will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. We would expect almost every case to be completed within one month.

## **10. Referral to the Disclosure and Barring Service and the Teaching Regulation Agency (TRA)**

Like all schools, we have a statutory legal duty to refer an individual, where there is the risk that he or she may harm, or has caused harm to children, to the Disclosure and Barring Service (DBS) within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. Reports concerning members of staff or volunteers are normally made by the CPO. If the CPO is involved, the report is made by the Head. If the Head is involved, the report is made by the Principal.

The referral form can be downloaded from the TRA on <https://www.gov.uk/government/publications/teacher-misconduct-referral-form>. The school plays no part in the subsequent process of barring individuals from working with children and/or vulnerable adults. We also have a legal duty to respond to any requests for information that we receive from the ISA at any time.

The School will consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. This may also be appropriate if a dismissal does not reach the threshold for DBS referral.

The reasons such an order would be considered are:

- unacceptable professional conduct
- conduct that may bring the profession into disrepute
- conviction, at any time, for a relevant offence.

In the event that an individual is referred to the DBS, it is not necessary to report to the TRA as well as the two bodies share information.

## **11. Recording Allegations of Abuse**

We will record all allegations of abuse, and our subsequent actions, including any disciplinary actions, on an individual's file. A copy will be given to the individual and he or she will be told that the record will be retained until he or she reaches statutory retirement age, or for ten years, if that is longer. Records relating to malicious allegations will be removed from the personnel records. Unfounded or malicious allegations will not be included in references no matter how many there have been.

## **12. Anonymous Allegations**

If we are faced with an anonymous allegation of child abuse which names both a member of staff and a child, we will handle it in exactly the same way as if we knew the identity of the person making the allegation. We will report the matter to the Wandsworth Safeguarding Children Partnership (WSCP) and be guided by them in our handling of the allegation. Where the allegation names the member of staff; but not the pupil, we will normally interview the member of staff, and ask for his or her version of events, unless the WSCB has advised a different course of action. It could be appropriate to establish a mentoring or review programme for that individual, or to provide him or her with further training. A record would normally be kept.

## **13. Handling Unfounded or Unsubstantiated Allegations**

### **13.1 The Child**

A child who has been the centre of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. We will liaise closely with the WSCB to set up a professional programme that best meets his or her needs, an Educational Psychologist, as well as support from a School Counsellor. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help him/her to achieve as smooth a transition as possible, working closely with the parents or guardians.

### **13.2 The Member of Staff**

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun him/her on the grounds of “no smoke without fire”. If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that he or she is likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of re-training may be appropriate.

#### **14. Allegation of Abuse of a Child who is not a Pupil at the School**

If we were given information that suggested that a member of staff was abusing a child who was not a pupil at Hurlingham school, we would immediately pass such information to the Wandsworth Safeguarding Children Partnership (WSCP) to handle. We would then interview the member of staff and formally advise him/her of the allegations, making it clear that the school would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc in exactly the same way as if the allegation had involved a school pupil. If the allegation subsequently proved to be unfounded, he or she would be given full support by the school in resuming his/her career.

#### **15. Allegations Involving the Head or Child Protection Officer (DMO)**

The Principal should be told at once by the DSL of any allegation involving the Head. She will obtain legal advice before proceeding to the steps outlined above. The Head will normally be suspended for the duration of the investigatory process, and one of the Deputy Heads will be made acting Head until the conclusion of the investigation and resolution of the issue.

The Head should similarly be told at once of any allegation involving the DSL. The Principal should normally be informed on the same day, and legal advice obtained. The DSL will normally be suspended for the duration of the investigatory process. The Head or a Member of the SLT who has been fully trained in Safeguarding and Child Protection should be made acting DSL until the conclusion of the investigation and resolution of the issue.

#### **16. Anonymity**

Section 13 Education Act 2011 came into force on 1 October 2012.

Where a pupil at a school makes an allegation against a teacher (not support staff) that a criminal offence has taken place, no information can be published that would lead to the identification of that person before they are charged or summonsed. It is a Criminal Offence to publish the identity of the individual ie. Website, facebook, Twitter etc. This applies to all members of the school community including parents and pupils.

Date of creation: September 2009

Date of last review: June 2020

Date for next review: June 2021

### **AGENCY REPORTING FORM FOR ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN WITHIN THE LONDON BOROUGH OF WANDSWORTH**

#### **WHEN TO USE THIS FORM**

This form must be filled in and sent to the Wandsworth MASH in every case where it is alleged or there are concerns that a person working with children has:-

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

Every incident should be recorded on this form and reported to the Wandsworth MASH.

If you are unsure as to whether the incident or concern needs to be referred, please ring the LADO to discuss. The LADO can be contacted on [LADO@richmondandwandsworth.gov.uk](mailto:LADO@richmondandwandsworth.gov.uk) or [LADO@wandsworth.gov.uk](mailto:LADO@wandsworth.gov.uk) – or 0208 8717440

If the matter is serious or there are **immediate** concerns for the child's safety or wellbeing, the referral must be made to Wandsworth MASH. [MASH@wandsworth.gov.uk](mailto:MASH@wandsworth.gov.uk) – 0208 8716622

If you do not have any relevant information for specific sections, please make this clear.

All allegations must be reported to the Wandsworth MASH within 24 hours (Working Together, Statutory Guidance, DfE, 2018)

You will be asked to provide associated relevant documentation once the information has been evaluated by the LADO. You will be advised regarding the appropriate action to be taken.

### **AGENCY Details**

Date of referral	
Referrers name	
Referrers job title	
Place of work & address	
Tel number	
Email	
Best contact times	
Who is your Designated Manager/Child Protection Lead	
If a school, please give contact details of Head and Chair of Governors	
Status of organisation e.g. LA, private, voluntary, etc	
Who is your HR lead for allegations against staff	

### **Allegation Details**

Date of alleged incident					
Date allegation reported to referrer					
Category of Abuse Alleged – please tick	Physical	Emotional	Sexual	Neglect	

Does this referral concern mishandling of medication – if so, please give details of medication concerned and purpose of the medication	
Who has made the allegation e.g. child, parent, other professional etc	
How was the allegation e.g. in person, by phone, letter and to whom	
Who else has been informed regarding allegation	
Full details of allegation	
Where is it alleged the incident took place	
What action if any has been taken regarding the allegation	
Is there an allegation of an injury and if so pl describe	
Has a member of staff seen the injury, if so, they may be asked to complete a body map diagram	
If injury has parent been advised to take child to GP and if so, have they done so?	
Are written incident reports available and if so by whom; please supply	
Are there witnesses to the alleged incident; please give details	
If there has been a delay in reporting the allegation state why	
Are the parents/carers of the child aware of the allegation and if so state when /their views	

Is the child aware of the referral and if so when, and what their views are	
Did an allegation of physical abuse follow an authorised / unauthorised restraint?	Yes No
If the allegation relates to restraint has staff member had Team Teach or similar training and when	

**Details of person/s subject to the allegation** please repeat box if more than one person

Person subject to allegation known/unknown	
First name	
Surname	
Title	
Job title	
DOB	
Home address	
Ethnicity	
Length of employment	
Date of last DBS	
Details of references taken up	
What is the status of the employment e.g. f/t, p/t, agency, volunteer etc	
If agency etc please give contact details	
Have they been subject to previous allegations and if so, please provide full details	
Are there any other concerns/issues of relevance regarding this person	
Does this person work in any other capacity with children either paid/unpaid?	

Does this person have children of their own? If so, please provide name(s), DOB(s) and address details	
Has the person been suspended/advice taken from HR	

**Details of potential victim/child** please repeat box if more than one child

Alleged victim known or unknown/no victim	
First name	
Surname	
DOB	
Gender	
Ethnicity/Religion	
Home address/tel.	
Parent's/carers names/contact details	
Who has PR for the child	
First language of child and parents/carers – is an interpreter required	
Issues of disability/communication/literacy for child or parent/carer	
Any other family members/significant persons for this child	
Has the child made a previous allegation and if so, please give details	
Is/has this child been Looked After or subject to a Child Protection Plan, Child in Need Plan	
GP / Health Visitor / School Nurse details	
Are there any known concerns about this child / young person	
Other information of relevance re this	



child and the allegation	
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**Please give details of any other information of relevance**

**Referrer’s name:**

**Referrer’s signature:**  
(please add electronically)

**Date:**

## Prevent Strategy – information and referrals flowchart

### What is 'Prevent'?

'Prevent' is part of the government's counter-terrorism strategy, CONTEST. The aim of the 'Prevent' strategy is *"to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism."*

The *Counter-Terrorism and Security Act 2015* gives the 'Prevent' strategy legal status in that schools and colleges in England and Wales are now obliged by statute "to have due regard" to the need to prevent people from being drawn into terrorism. The Prevent strategy explains that *"schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol."*

### What is 'extremism' or an 'extremist'?

No legal definition but the Prevent strategy document defines extremism as *"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."* The document also includes in its definition of extremism *"calls for the death of members of our armed forces, whether in this country or overseas."*

### What is radicalisation?

Although the percentage of people prepared to support violent extremism in this country is very small, it is significantly greater in young people.

Radicalisation is driven by a belief which supports the use of violence. We do not need to understand the ideologies or ideas that are promoted, more the way they hook into the vulnerable.

### What is 'Channel'?

The Association of Chief Police Officers (ACPO) guidance, Prevent, Police and Schools, describes Channel as *"a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorist-related activity."*

### Safeguarding in Prevent

*Prevent* is just another form of safeguarding, a way of offering support and intervention if someone is on a pathway to extremism. Radicalisation is a process and it is unlikely that one single event will trigger a person to become radicalised and support violent extremism. *Prevent* can help steer a person away from embracing violence as a solution to the grievances they hold, whether motivated by politics or religion.

If concerns have been raised about a child, then the first person to notify is the DSL for the relevant site (Prep School or Nursery) who can make an assessment based on the information available. They may ask to speak to the child or young person themselves to pose a series of informative questions to ascertain if it is an isolated incident or indicative of a more worrying mind-set.

**Remember, they may hold information you are not aware of so, it is always advisable to report concerns, however minor they may appear at first glance.**

### What is our role as a School and your role as teachers in the context of Prevent?

Teachers' main responsibility in relation to the Prevent strategy is to protect children from extremist and violent views by:

1. having awareness of 'Prevent' and "the risks it is intended to address";
2. ensuring that children are taught "in a way that is consistent with the law and our values"; and
3. helping to identify and refer to the relevant agencies "children whose behaviour suggests that they are being drawn into terrorism or extremism".

As a school it is important for us to ensure that the *Prevent* strategy does not reduce or constrain opportunities for 'safe' and educational debate. Pupil need opportunities within appropriate subjects, curricula opportunities, or forms to express views, seek advice and have questions answered. They require the opportunity to explore the issue of diversity, human rights and understanding Britain as a multi-cultural society.

We need to ensure that we provide a learning environment for thinking and questioning, whilst promoting the importance of 'British Values' to include democracy, tolerance and respect for the rule of law, in which our pupils can raise controversial questions and concerns without fear of reprimand or ridicule.

It is our job to:

- explore and promote diversity and shared values between and within communities.
- challenge Islamophobia, anti-Semitism, far-right ideologies and other prejudices.
- support all children's and young people's sense of belonging in 21<sup>st</sup> century Britain and enable children and young people to develop respect for themselves and form mutually respectful, inter-cultural relationships with others.
- help pupils to develop knowledge of religion, history, geography, citizenship, English (particularly the critical study of the media) and analyse current issues of concern;
- help pupils to develop the skills needed to evaluate effectively and discuss potentially controversial issues;
- provide safe spaces for pupils to discuss openly issues that concern them including exploring their own identities and how these relate to the diversity of the society in which they live;
- support those at risk of being isolated or becoming disaffected from their learning or their peers by talking to relevant people (e.g. the DSL) about individual education plans or multi agency support plans.

It is vital that as a whole school we 'address issues of disparity and commonality and how we live together' and that, as teachers, you are confident in tackling controversial issues to challenge any misconceptions.

### **What are the risk factors that you may be expected to look for in individual pupils?**

The Prevent duty guidance is lacking in detail and does not address this point. However, previous guidance from the Department for Children Schools and Families (DCSF) Learning together to be safe states that *"there is no obvious profile of a person likely to become involved in extremism and there is no single indicator of when a person might move to adopt violence in support of extremist ideas."*

As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. **Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour.**

The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

### **Recognising Radicalisation**

The following signs and behaviours could indicate vulnerability:

- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Pupils accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Pupils voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Cultural and/or religious isolation
- Sudden change in religious practice
- Violent/ rhetoric language
- Hate rhetoric
- Political activism



Many of these the elements are really going to be more appropriate to older children but those which are perhaps most relevant to us and the children within Hurlingham are:

### **Cultural and/or Religious Isolation**

This means that a person will try to avoid people who are not from the same cultural or religious group. At its most extreme there will be no contact with anyone outside of the person's culture and/or religious group. They will actively avoid socialising with diverse or different groups.

Examples are:

- Someone who follows Nazi ideology will avoid people who are not white or someone who they believe may be homosexual. This is because Nazism promotes racism and homophobia.
- People who follow the teachings of a group like Al Qa'ida/ISIL/Daesh will want to avoid anyone from different religions because Islamist inspired ideologies teach hatred and mistrust of other faiths.

However, it should be noted that strong religious observance is also a strong protective factor against engaging in risk-taking behaviour for many young people and a deep or strong understanding of their religion will protect an individual being drawn in by abusive narratives and misinterpretations of that religion.

It is when religious knowledge is poor, that a person becomes more vulnerable to incorrect interpretations of that religion.

### **Sudden Change in Religious Practice**

The key issue here is the increase in religious observance (i.e. becoming more religious) when combined with a limited or poor religious understanding. Especially when the version of the religion comes from a violent extremist ideology.

### **Violent Rhetoric/Language**

Just being exposed to violent language is not the issue. The key problem here is extensive and prolonged engagement with violent rhetoric that promotes the use of violence against specific groups and justifies the use of violence against those groups. Exposure to this rhetoric will influence the decision to see violent extremism as a legitimate response against those groups.

One example is David Copeland (the 1999 London Nail Bomber) who spent many months immersed in Nazi thinking and came to believe it was not only OK, but actually necessary, to attack people who were of a non-white ethnic background or who were homosexual.

If a child is being exposed to this kind of constant violent language, then it will appear in both their normal

conversation and in the seeking out or possession of material that contains this same violent language, often from the Internet.

### **Hate Rhetoric**

Hate, specifically hatred of the 'other' (i.e. the target group), sustains violent extremism. It could be hatred of:

- a particular religious group
- 'The West'
- a particular culture
- a nationality
- a government

The use of language by a person or group that generates hatred and dehumanises any other individual or group indicates an increased risk of violent behaviour.

The use of such language will create the impression that such beliefs are normal and acceptable. This will be expressed in both casual conversation and the seeking out or possession of material containing similar hate rhetoric.

### **Political Activism**

*Prevent* is not opposed to political activism; in fact a democratic society openly encourages such activism.

However, when a person demonstrates an increased political awareness on issues that are championed by extremist groups, **as well as a motivation to act on that awareness**, we might have cause for concern.

Increased political awareness and criticism of any Government's policies is **not** a measurement for assessing a person's vulnerability to recruitment by extremists.

### **It is important to remember:**

- All of these factors are based on 'real-world' first-hand research and interviews with convicted terrorists, extremists and radicalisers.
- CHANNEL referrals have emerged as young as 13 years old, with instances of Primary Schools having been specifically targeted by violent extremists to be recruited at a very young age.
- In addition, a child that develops in a family environment with a violent extremist mind-set is more likely to mirror those views.

Once a child expresses physical evidence (in what they say, write, draw or view online) of an extremist ideology then there is a chance that they are being drawn towards that ideology.

At the very least, they may have an unhealthy interest in a subject that glorifies violence and hatred and this should be cause for concern from a safeguarding perspective.

Extremism flourishes where intolerance is allowed to prevail. A sense of 'the other' can restrict integration and create a mind-set that views hostility against those with different beliefs and backgrounds as acceptable.

**It is important to differentiate between a lack of understanding of alternative faiths and cultures and an active avoidance of and hostility towards them.**

**Further Information** 6.1. Wandsworth provide further information for teachers at:

<http://fis.wandsworth.gov.uk/kb5/wandsworth/fsd/service.page?id=qd087AZMssY>

6.2. The following link provides further information and training on the Prevent Strategy and the duties that public bodies have in being vigilant about ensuring that students are safeguarded from extremist ideology:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

6.3. A Government briefing note regarding the use of social media for online radicalisation can be found here:

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

## Staff Behaviour (Guidance for Staff on Safe Working Practice in School)

Primarily all staff must adhere, at all times, to the Staff Code of Conduct which can be found in the Staff Handbook.

### Positive Handling and Physical Intervention

Our policy on positive handling and physical intervention by staff is set out in a separate document and acknowledges that staff should only use physical intervention in particular circumstances, and that even when necessary the minimum force should be used to prevent harm to the child or another child or adult.

Risk assessments will be carried out where individual pupils have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers

Physical intervention which causes injury or severe distress to a child may have to be considered under child protection or disciplinary procedures.

Please refer to our full policy on **'Pupil Restraint'** for additional guidance.

### Staff Safeguarding themselves and Colleagues - Avoiding allegations of child abuse

Because teachers and school staff have daily contact with children in a variety of situations, including the caring role, they are vulnerable to accusations of abuse.

Teachers may unknowingly place themselves at risk of being accused of child abuse under the specified headings, for example:

**Neglect** can include failings of a teacher if a child's intellectual development suffers some impairment, because the Children Act has a wide definition of "development".

**Development**, in the Children Act, can extend to physical, intellectual, emotional, social or behavioural development.

**Physical** can extend to any physical intervention by a teacher on a pupil. It does not have to amount to punishment, deliberate or formal. For example, guiding a pupil out of a classroom, throwing any object at a pupil, pushing a child's shoulders gently to encourage them to sit down and putting a hand up to prevent a child from running away have all resulted in complaints of abuse against teachers. An allegation could result in a criminal action.

**Sexual** is clearly the form of abuse which carries with it the greatest fear and stigma and the most extreme results. An allegation of sexual abuse can be made against a teacher in what may seemingly amount to quite innocent circumstances, such as towelling young children down after swimming, kissing or embracing a child in an effort to comfort or console, touching or cuddling. Teachers must always remember that they are professionals and must always act as such. It may be inappropriate for teachers to exhibit a physically-comforting role because a child may not be used to such affection at home or it may be alien, hostile or even threatening to a child. (Sexual abuse can, of course, also amount to a criminal offence).

**Emotional** can include an allegation made by a child of harassment or victimisation where the child perceives a teacher to be constantly correcting or criticising them.

### Situations to be avoid by all staff (whether employed, contracted a volunteer or student)

Where independent evidence is available, an allegation can be investigated and cleared up quickly. If there is no such evidence, further investigation will be required and it will be more difficult to establish whether the teacher or the child is telling the truth.

This is why it is extremely important to have an independent witness in all the following situations:

- **Where a child is distressed** or shows a need for physical comfort, it is vital that any demonstration of professional comfort should only take place either in a classroom situation or in front of another appropriate senior member of staff.
- **Where a teacher has to administer medicines or first aid** in an emergency, it is always prudent – whenever possible – for another responsible adult to witness this. This is to corroborate the teacher’s diagnosis and assessment of the situation and to witness the administration of treatment to the child.
- **Where force must be used to avert an immediate danger** either inside or outside the classroom, it may not always be practicable to ensure that a witness is present. Nevertheless, the importance of the independent witness is to verify the “immediate danger” as perceived by the teacher. Where intervention results in physical contact with a pupil, this information could be used as a defence to an allegation of assault. The teacher’s actions must be held to be reasonable, taking into account the immediacy of the danger and the risk the action was intended to avoid. An independent witness can corroborate the teacher’s version of events and can counter any allegation of assault made by the pupil.
- **Where pupils are taught on a one-to-one basis by members of staff** such as individual music lessons or learning support provision. Teachers must ensure that any such teaching only takes place in teaching spaces with glazed viewing panels in either the wall or door. Should, for some reason, this not be possible, then the door to the room must be left open.
- **Where teachers must operate in a one-to-one situation under any circumstances:** a pupil at school, off site, at home, a special unit or in any form of transport (including private cars) between any of these, it is important that a responsible adult should be available to verify the purpose and nature of the tuition. For example, a senior teacher, available parent or other adult could be alerted to the potential risk placed on the teacher by a one-to-one situation and it would be wise to ask for a discreet presence to be maintained without prejudicing the child’s need for confidentiality or individual attention. It is always unwise for a teacher to suggest or propose additional tuition at the teacher’s home. Any additional tuition must take place in school or the child’s home after consultation with the parent and the Head. When teachers find themselves in a one-to-one situation with a pupil, the door to the room should always be open. Unless dealing with a *real* emergency (such as a child’s broken limb), staff should *never* find themselves in a one-to-one situation with a pupil in a changing room or toilet area.
- **When teachers participate in extra-curricular activities**, the risk of allegations of abuse increases as the teachers move away from structured professional classroom situations. Where there are after-school activities and school trips, it is important that another teacher, responsible adult or parent accompanies the party to ensure that the teacher is not placed in a potentially exposed position. The additional adult would provide evidence if a child accused a teacher of unprofessional conduct. It may also provide the teacher with support when a child’s irrational or unusual behaviour becomes cause for concern.
- **All electronic communication between a member of school staff and a pupil** *must* be through the Hurlingham School webmail. *No* pupil should be told any other e-mail address for any member of staff. Staff should not engage in any form of activity on a “Social Networking” site such as Facebook with *any* pupil. If in any doubt staff should consider blind copying their Head or Head of Section in on any electronic communication with children.

All reports of any allegation made by one teacher to another or made by other children to a teacher must be taken up with the DSL at once who will in turn liaise with the Head. Any member of staff who is seriously concerned about the physical or emotional wellbeing of a child should report this to the DSL who will liaise with the Head. Staff have a duty to report such concerns. They must not be bound by promises of confidentiality and should be wary of making any such promises.

The DSL and Head, after discussion with relevant staff, will be responsible for taking appropriate action.

The Safer Recruitment Consortium has recently updated original DfES Guidance on Safe Working Practice for professionals working in education settings. The revised guidance can be found here: <http://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf>

## Pupil Restraint Policy

This Pupil Restraint Policy applies to all aspects of Hurlingham School's work, including the Early Years Foundation Stage.

At Hurlingham School our aim is to provide a welcoming, secure and safe environment where corporal punishment is not used. The aims of this policy are that all staff understand clearly the options and strategies for restraining children safely. The school follows the principles and recommendations set out in *The use of force to control or restrain pupils: Guidance for schools in England* from the DCSF.

This policy should also be read in conjunction with the school's pupil behaviour policies. The school aims to create an environment in which the use of force in relation to a pupil is never necessary. The Head will put strategies in place so all staff are aware of how to take the heat out of serious incidents and ensure that individual plans are in place for pupils whose behaviour could give rise to such a serious incident.

Under section 131 of the School Standards and Framework Act 1998, corporal punishment is prohibited for all pupils in independent and maintained schools. The prohibition includes the administration of corporal punishment to a pupil during any activity, whether or not within the school premises. The prohibition applies to all "members of staff". These include all acting in loco parentis, such as unpaid, volunteer supervisors.

Under subsection 548(5) of the Education Act 1996, teachers may use "physical intervention" to avert "an immediate danger of personal injury to, or an immediate danger to the property of, a person (including the child himself)." Teachers' powers under section 4 of the 1997 Act to restrain pupils from engaging in certain activities remain.

Any significant incidents that require restraint will be recorded. Parents/carers will be informed of any recordable incident and will be offered an opportunity to discuss the incident with the Head, Deputy Head Pastoral and Operations or appropriate class teacher and given a copy of this policy.

It is the responsibility of the Head to ensure that staff are fully informed of the school's policy. The Head will arrange training and guidance to staff as appropriate.

Date of policy: January 2010

Date of last review: June 2020

Date of next review: June 2022



## Self-Harm Policy

### 1. Introduction

Recent research indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. School staff can play an important role in preventing self-harm and also in supporting students, peers and parents of students currently engaging in self-harm.

### 2. Scope

This document describes the school's approach to self-harm. This policy is intended as guidance for all staff including non-teaching staff and governors.

### 3. Aims

- To increase understanding and awareness of self-harm
- To alert staff to warning signs and risk factors
- To provide support to staff dealing with students who self-harm
- To provide support to students who self-harm and their peers and parents/carers.

### 4. Definition of Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

### 5. Risk Factors

The following risk factors, particularly in combination, may make a young person particularly vulnerable to self-harm:

Individual Factors:

- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills
- Hopelessness
- Impulsivity
- Drug or alcohol abuse

#### Family Factors

- Unreasonable expectations
- Neglect or physical, sexual or emotional abuse
- Poor parental relationships and arguments
- Depression, self-harm or suicide in the family

#### Social Factors

- Difficulty in making relationships / loneliness
- Being bullied or rejected by peers

### 6. Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from the DSL.

#### Possible warning signs include:

- Changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)

- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing

## **7. Staff Roles in working with students who self-harm**

Students may choose to confide in a member of school staff if they are concerned about their own welfare, or that of a peer. School staff may experience a range of feelings in response to self-harm in a student such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to students it is vital to try and maintain a supportive and open attitude – a student who has chosen to discuss their concerns with a member of school staff is showing a considerable amount of courage and trust.

Students need to be made aware that it may not be possible for staff to offer complete confidentiality. If you consider a student is at serious risk of harming themselves then confidentiality cannot be kept. As with all safeguarding matters, It is important not to make promises of confidentiality that cannot be kept even if a student puts pressure on you to do so. Any member of staff who is aware of a student engaging in or suspected to be at risk of engaging in self-harm should consult the school's DSL or the Head.

Following the report, the DSL and/or the Head will decide on the appropriate course of action. This may include:

- Contacting parents / carers
- Arranging professional assistance e.g. doctor, nurse, social services
- Arranging an appointment with a counsellor
- Immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- If a student has self-harmed in school a first aider should be called for immediate help.

## **8. Further Considerations**

Any meetings with a student, their parents or their peers regarding self-harm will be recorded in writing including:

- Dates and times
- An action plan
- Concerns raised
- Details of anyone else who has been informed

This information will be stored in the School's safeguarding file. It is important to encourage students to let you know if one of their peers is in trouble, upset or showing signs of self-harming. Friends can worry about betraying confidences so they need to know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action & being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult the DSL.

When a young person is self-harming it is important to be vigilant in case close contacts with the individual are also self-harming. Occasionally schools discover that a number of students in the same peer group are harming themselves.

Date created: Autumn 2014

Date of last review: July 2022

Date of next review: September 2022

## Use of Mobile Phones and Cameras

This appendix should be read in conjunction with the separate school documents *Taking, Storing and Using Images of Children*, *The Bring Your Own Device (BYOD) Policy for Staff, Parents and Visitors* and the Staff Code of Conduct.

Electronic devices (including, but not limited to, mobile phones and cameras) should only ever be used to take photographs, videos or other recordings of children if the equipment is the property of the school and the children are made aware that their image, voice or both are being recorded.

As soon as the electronic file has been created, it should be transferred onto the relevant area of the school network media drive at the first possible opportunity and the file on the device should then be deleted. The file should only be retained on the school media drive for the time duration of its potential reasonable use in school. If it will no longer be used, it should be deleted.

Portable storage devices must be manually scanned with the school's anti-virus software before any files are transferred or opened. If you are unsure of how to do this, please ask the Head of Media and Computer Resources. Data should only be temporarily stored on portable storage devices and in accordance with the school's data protection policy and should be encrypted.

No images of children should ever be uploaded to photo or video sharing sites.

**No applications within mobile telephones which make use of the device's audio or video recording features, whether those recording facilities are intended to be used or not, should ever be activated in a room where EYFS (Nursery and Reception) children are present.**

### Mobile Telephones

**No mobile telephones should ever be taken into an area of the school where EYFS (Nursery and Reception) children are present.**

Staff are permitted to have their mobile phones turned on during the school day but the phone must be set to silent and should only ever be used in the staffroom or an empty classroom. It is inappropriate to receive calls, read texts or use a mobile phone when children are present or school business is being conducted unless the communication in question is both urgent and school-related. Any calls made or received during the day should be dealt with quickly and should not take up valuable time which could be used for teaching, planning or other work commitments.

Should a member of staff wish to use their mobile telephone for a teaching purpose relevant to the lesson being undertaken (for example, to conduct a piece of internet research and no other device is available to them,) this is acceptable providing there are no children of EYFS age present, and the teacher clearly articulates what they are doing, in real-time as they do it, and tells the children why they are doing it.

**Children must never be photographed by cameras built into mobile phones; the only exception may be for the use of school owned property which should then be returned to the Head of Computer and Media Resources.**

### Cameras

**The only cameras used in school should be school property; staff should not use their own devices.**

Should a photograph or video of a child be taken using a digital camera, the image or video file must be transferred onto the school network media drives at the first possible opportunity and the file on the camera must then be deleted. No images or films of children should ever be uploaded to photo or video sharing sites.

## Reference Documents

### London Child Protection Procedures, 5<sup>th</sup> edition

available electronically via Wandsworth Safeguarding Board website [www.wscb.org.uk](http://www.wscb.org.uk) and London SCB website – [www.londonscb.gov.uk](http://www.londonscb.gov.uk)

### London Safeguarding Children Board supplementary procedures

These provide detailed information related to specific safeguarding issues. They are available via the London SCB website (as above).

### Keeping Children Safe in Education

DfES statutory guidance issued Sept 21

Keeping Children Safe in Education 2022

Or via [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

**This guidance contains links to guidance and advice about many of the key specific safeguarding issues.**

### Working Together to Safeguard Children 2018

### What To Do If You Are Worried a Child Is Being Abused

[What to do if you are worried – revised guidance for all professionals to use if they are worried a child may be being abused](#)

### Information Sharing Guidance

[Information Sharing Guidance 2015 – revised guidance on information sharing for all professionals](#)

### Managing Allegations Against Staff

WSCB guidance, available on WSCB website. [www.wscb.org.uk](http://www.wscb.org.uk)

### Children Missing from Home and Care

WSCB procedures, available on WSCB website [www.wscb.org.uk](http://www.wscb.org.uk)

### Positive Handling

WSCB guidance, available on WSCB website [www.wscb.org.uk](http://www.wscb.org.uk)

### Sexual exploitation

WSCB protocol and guidance, available on WSCB website [www.wscb.org.uk](http://www.wscb.org.uk)

### Domestic Violence – guide for schools

Wandsworth guidance issued June 2012

### Thresholds for Intervention – Multi-Agency guidance

Wandsworth Guidance updated 2020, available on WSCP website [www.wscp.org.uk](http://www.wscp.org.uk)

### Counselling in Schools: a blueprint for the future (February 2016)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/497825/Counselling\\_in\\_schools.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf)

### Mental Health and Behaviour in schools – departmental advice for school staff

DfE guidance, issued June 2014

DFE-00435-2014 [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

### Whistleblowing policy – Wandsworth Council HR or general guidance can be found at

<https://www.gov.uk/whistleblowing>

**DfE advice for schools:** teaching online safety in schools

**UK Council for Internet Safety (UKCIS) guidance:** Education for a connected world

**UKCIS guidance:** Sharing nudes and semi-nudes: advice for education settings working with children and young people

**The UKCIS external visitors guidance** will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

**National Crime Agency's CEOP education programme:** Thinkuknow

**Public Health England:** Every Mind Matters

**Harmful online challenges and online hoaxes** - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

**LGFL 'Undressed'** provides schools with advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

The NSPCC what you can do to report abuse dedicated helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Safeguarding Children and young people from knife crime  
OFSTED report March 2019

Vulnerable Children in a Digital World  
Adrienne Katz and Dr Aimen El Asam in partnership with Internet matters.org

Wandsworth Safeguarding Children Partnership – published arrangements 27<sup>th</sup> June 2019

Ofsted framework for Inspecting safeguarding in early years, education and skills

## Low-Level Concerns and Neutral Notifications at Hurlingham School Policy

Hurlingham School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

We pride ourselves on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

### Definitions

For the purposes of this policy, a **low-level concern** is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold, or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Staff Behaviour (Guidance for Staff on Safe Working Practice in School) in Appendix 12 of this policy.

Low-level concerns are differentiated from concerns that can cause **harm**. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

### School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the Staff Behaviour (Guidance for Staff on Safe Working Practice in School) in Appendix 12 of this policy, as well as the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

## Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Head immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than **24** hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Head or deputy Head verbally, or by submitting a Neutral Notification on CPOMS, see below. When submitting concerns, staff will take care to ensure that they observe the Allegations of Abuse Against Staff Policy, and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Head, it should be reported to the Principal.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Head, who will, in turn, inform the employer of the subject of the concern.

## Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct or violates the Staff Behaviour Guidance.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

## Evaluating concerns

Where the Head is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Head will discuss the concern with the DSL, and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the Head will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Safeguarding and Child Protection Policy, at all times.

To evaluate a concern, the Head and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.

- Speak to any witnesses.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

## **Acting on concerns**

### **Where the concern is unfounded**

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Head will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Head will discuss the concern with the DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL, Head and Principal will work together to resolve this with input from other staff members, as necessary.

### **Where the concern is low-level**

Where the Head determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
  - Talk to the individual in a non-accusatory and sympathetic manner.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.
  - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
  - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct and/or the Staff Behaviour (Guidance for Staff on Safe Working Practice in School), depending on the nature of the concern.
- The DSL, Head and Principal will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the Head will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

When a low-level concern has been raised by a third party, the head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

The Head will ensure that all details of the low-level concern, including the name of the person reporting (respecting wishes to remain anonymous as far as reasonably possible) any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The Head will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.



The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If we are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with our LADO.

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

### **Where the concern is serious**

The Head may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Head will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

### **Record keeping**

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Head will ensure that all records include the most accurate and up-to-date information and will store them in the secure CPOMS platform. The Head will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Head and Principal to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

Consideration will be given as to whether any wider cultural issues exist in School which enabled the behaviour to occur and whether any policy revisions or additional training should be implemented in order to minimise the risk of recurrence.

All rationale relating to any decisions and actions taken will be recorded in the neutral notification section of the CPOMS platform.

## **Neutral Notifications**

Neutral notifications is a reporting system for low-level concerns for use by all staff and will become an integral part of the school's safeguarding provision. The aims are as follows:

- To ensure there is a formalised mechanism for reporting low-level concerns;
- To identify patterns of behaviour that are concerning;
- To allow staff to self-report to the school to protect themselves in situations where they may have found themselves compromised;
- To ensure the school continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

**Staff can access neutral notifications through the School's CPOMS platform. Any neutral notifications posted on CPOMS will only be visible by the DSLs, Fiona Goulden and Simon Gould.**

**Should your concern involve Fiona Goulden, please report your concern directly to the LADO. Should your concern involve Simon Gould, please report your concern verbally to the DSL and Fiona Goulden in the first instance.**

Any member of staff who wishes to discuss the details of the system may speak with either of the DSLs in the first instance or the Principal who has responsibility for all safeguarding matters on behalf of the Board of Directors.

## **Context**

During any period of remote education, staff, pupils and parents are encouraged to report any concerns related to online behaviour by emailing the Head of Section or Head in the first instance. This is in recognition of the increased time pupils would spend online and the possibility this might precipitate a greater number of behavioural concerns revolving around access to the internet. It is important that there is a quick and efficient way of alerting the safeguarding team of such matters.

This protocol will remain in place for any pastoral concerns which parents wish to inform the school about. Concerns will continue to be assessed by the safeguarding team and acted upon as necessary with the support of the relevant pastoral staff.

For staff, the neutral notifications section on CPOMS should be used to report incidents when they may have inadvertently ended up in a one-to-one meeting with a pupil online, emailed a pupil to their private email address or were concerned about the behaviour or appearance of a pupil during a lesson. This system is particularly effective in ensuring staff are able to self-report when their behaviour could potentially be misconstrued, misinterpreted or leave them vulnerable.

In light of paragraph 408 of KCSIE 2021, the recommendations in response to recent serious case reviews (most notably the Davies Review), and research conducted by the Safeguarding Unit at Farrer and Co, the school recognises the importance of developing its own robust mechanism for staff to report low-level concerns within an educational context and where adults are working with young people.

## Self-reporting

As such, we have created a **neutral notification** category through which staff can alert the **DSL (and Head)** to any occasion where they feel their behaviour or actions may be misconstrued or misinterpreted. When thinking about whether it is appropriate to use neutral notifications, it is helpful to consider whether it would be prudent to notify the DSL at an early stage while the facts are clear in the mind rather than being required to recall the incident at a later date, should it be required. In the vast majority of cases there is a perfectly innocent or logical reason for the behaviour and staff should not feel that by self-reporting they will suffer any detriment or stigma. Reporting of such concerns is a neutral act, designed to protect the member of staff and pupil through transparency. Such reporting also helps the school to evolve its practice and ensure appropriate training and protocols are in place for the benefit of all staff and their safety. The DSL will, on receipt of a notification, decide how best to approach the issue and whether any further action is required. In all instances, the member of staff will receive a response via email or have the opportunity to meet with the DSL.

## Concerns regarding the behaviour of another adult towards a child

Equally, staff may use the Neutral Notifications category on CPOMS to report any behaviour by an adult towards a pupil or another child that may have concerned them. It is important that any concerns or incidents which might give rise to concerns about the conduct of a member of staff are reported to the DSL, not just where it is clear that a role or professional boundary has been broken. Again, such reporting is to protect both pupils and staff and allows for a simple record to be kept in case events are later referred to or any patterns emerge. Staff are not passing judgment on the behaviour but simply presenting it.

It is accepted that there are occasions when school staff, as professionals, have to make decisions and act in a particular way in order to protect the health, safety and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position or cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation in future. In this scenario, staff must make a neutral notification.

The process of reporting

Neutral notifications may be made in person to the DSL or in the neutral notification category in CPOMS. If the notification is made in person in the first instance, staff may be required to complete an electronic form later. A staff member who makes a neutral notification, or a more serious allegation, in good faith will be supported through the process, and will benefit from the protection set out in the Whistleblowing Policy.

## When to use neutral notifications

Circumstances in which a member of staff should make a neutral notification are as follows:

- Any incident where s/he feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation;
- Any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- Any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (school medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons etc.;
- Any incident where a member of staff engages in a one-to-one meeting with a pupil online that has not been arranged following the accepted protocols.
- Any incident where a member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- Any social contact with pupils outside of school (other than planned / authorised events, educational trips, or trivial incidents such as passing a pupil in the street or the supermarket or noticing that they are sitting, separately in the same restaurant, cinema, etc.) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- If a pupil becomes aware of / or uses a staff member's home address, mobile or home phone, or non-school email address other than in accordance with agreed protocols;

- The fact of, and explanation for, any one-to-one contact with a pupil on school trips, particularly if this takes place in a bedroom or other private space;
  - Any incident where, for whatever reason, a member of staff has not complied with the Code of Conduct; This is not intended to be an exhaustive list and there will be other circumstances where using the neutral notification system will be appropriate. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved.
- Staff who are unsure of whether to complete a neutral notification are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made – nothing is lost by acting in this way.

### **Storage and action**

Neutral notifications are stored on a confidential category within CPOMS which can be accessed only by the **Head, DSL and Principal**. A member of staff will always be made aware of any notification that relates to them.

Date of policy: October 2021

Date of last review: July 2022

Date of next review: september 2022