



## Safeguarding: Child Protection Policy

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Knightsbridge School including Early Years Foundation Stage

Date Approved by Proprietor: August 2023

Date when the policy is due for Review July 2024 or in the event of regulatory changes

**Key Safeguarding contacts:**

At Knightsbridge School, the Designated Safeguarding Lead for the School including the EYFS is **Mrs Gillian Conlon**, Head of Nursery & SMT Member who may be contacted on 0207 590 9000.

The Deputy Designated Safeguarding Leads are **Mr Domingo Benasco Perez** (seniors) and **Ms Francesca Torrigiani-Spagnoli** (juniors), who may be contacted on 0207 590 9000.

E-safety is the overall responsibility of the DSL supported by the Head of Computing, **Mr Rob Conway**.

**SAFEGUARDING AND CHILD PROTECTION CONTACTS FOR SCHOOLS****Bi Borough Safeguarding and Child Protection Training, Consultation and Advice:**

- **Elaine Campbell** – Bi Borough Safeguarding and Child Protection Schools and Education Officer  
Direct line: 07712 236 508  
[elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk)

**Bi Borough Safeguarding Review and Quality Assurance:**

- **Angela Flahive** – Bi Borough Head of Safeguarding Review and Quality Assurance (Mon-Thurs only)  
Direct line: 020 7361 3467/07971 320 888  
[Angela.Flahive@rbkc.gov.uk](mailto:Angela.Flahive@rbkc.gov.uk)

**Bi Borough Safeguarding:**

- **Anna Carpenter** – Safeguarding Review and Quality Assurance Manager  
Direct line: 020 8753 5124  
[Anna.Carpenter@lbhf.gov.uk](mailto:Anna.Carpenter@lbhf.gov.uk)
- **Sarah Mangold** – Bi Borough Safeguarding Lead  
Direct line: 020 7598 4440/07866 973 266  
[Sarah.Mangold@rbkc.gov.uk](mailto:Sarah.Mangold@rbkc.gov.uk)

**Bi Borough Child Sexual Exploitation (CSE) – Advice/guidance:**

- **Sarah Stalker** – The Royal Borough of Kensington and Chelsea Family Support and Child Protection Advisor (Mon-Weds only)  
  
Direct Line: 020 7598 4640/07971 322 482  
[Sarah.Stalker@rbkc.gov.uk](mailto:Sarah.Stalker@rbkc.gov.uk)
  
- **Cathy Smith** – Westminster Family Support and Child Protection Advisor (Mon-Weds only)  
Direct Line: 020 7641 7675  
[cjsmith@westminster.gov.uk](mailto:cjsmith@westminster.gov.uk)
  
- **Leonie Bingham** – Westminster Child Protection Advisor  
  
Direct Line: 020 7641 4199  
[lbingam@westminster.gov.uk](mailto:lbingam@westminster.gov.uk)
  
- **Emily Harcombe** – Hammersmith and Fulham Family Support and Child Protection Advisor (Mon-Weds only)  
  
Direct Line: 020 8753 6918/07467 734 648  
[Emily.Harcombe@lbhf.gov.uk](mailto:Emily.Harcombe@lbhf.gov.uk)
  
- **Kamal Patel** - Multi – Agency Safeguarding Hub (MASH) Team Detective Inspector  
  
Direct Line: 020 3276 2841  
[Kpatel4@westminster.gov.uk](mailto:Kpatel4@westminster.gov.uk)

**Bi Borough Private Fostering – Referrals and advice/guidance:**

- **Janet Lewandowski** – Bi Borough Senior Practitioner, Private Fostering Advisor  
Direct line: 020 7641 7564  
[jlewandowski@westminster.gov.uk](mailto:jlewandowski@westminster.gov.uk)

**Bi Borough FGM – Advice/guidance:**

- **Gourita Gibbs** – Child Protection Advisor  
  
Direct line: 020 7641 1610

[ggibbs@westminster.gov.uk](mailto:ggibbs@westminster.gov.uk)

**Bi Borough (Hammersmith & Fulham and Royal Borough Kensington & Chelsea**

**PREVENT – Advice, guidance, training queries and referrals to Channel Panel**

- Bi Borough (Hammersmith & Fulham and Royal Borough Kensington & Chelsea PREVENT – Advice, guidance, training queries and referrals to Channel Panel
- **Aysa Esakji** - Tri Borough Prevent Schools & Colleges Officer – Counter Extremism Prevent Education Officer

Environment Department / Environment and Communities  
Hammersmith & Fulham Council and Kensington & Chelsea Council  
07717864849  
[david.ellard@lbhf.gov.uk](mailto:david.ellard@lbhf.gov.uk)

- **Mark Chalmers** – Prevent Programme Manager, Westminster enquiries only  
Direct Line: 020 7641 6032  
[mark.chalmers@westminster.gov.uk](mailto:mark.chalmers@westminster.gov.uk)

**Bi Borough Multi-Agency Safeguarding Hub (MASH):**

- **Nasheen Singh** - Interim Head of Assessment and MASH  
Direct Line: 020 7641 3986/07508 004 125  
[nsingh@westminster.gov.uk](mailto:nsingh@westminster.gov.uk)
- **Catherine Hoy** – MASH Service Manager  
Direct Line: 020 7641 5428  
[choy@westminster.gov.uk](mailto:choy@westminster.gov.uk)

**Child Protection Referrals, Consultation & Advice about a child/young person resident in Hammersmith & Fulham:**

- **Hammersmith and Fulham Duty Line**  
Duty Line – 020 8753 6600  
Out of hours – 020 8748 8588
- **Emily Harcombe** – Hammersmith and Fulham Family Support and Child Protection Advisor (Mon-Weds only)  
Direct Line: 020 8753 6918/07467 734 648  
[Emily.Harcombe@lbhf.gov.uk](mailto:Emily.Harcombe@lbhf.gov.uk)

**Child Protection Referrals, Consultation & Advice about a child/young person resident in The Royal Borough of Kensington and Chelsea (RBKC):**

▪ **Kensington and Chelsea Duty Line**

Duty Line – 020 7361 3013  
Out of hours – 020 7361 3013

▪ **Rupinder Virdee** – Family Support and Child Protection Advisor

Direct Line: 07989 155 271  
[Rupinder.Virdee@lbhf.gov.uk](mailto:Rupinder.Virdee@lbhf.gov.uk)

▪ **Sarah Stalker** – Family Support and Child Protection Advisor (Mon-Weds only)

Direct Line: 020 7598 4640/07971 322 482  
[Sarah.Stalker@rbkc.gov.uk](mailto:Sarah.Stalker@rbkc.gov.uk)

▪ **Angela Clayton** – Family Support and Child Protection Advisor (Weds-Fri only)

Direct Line: 07807 159 907  
[Angela.Clayton@rbkc.gov.uk](mailto:Angela.Clayton@rbkc.gov.uk)

**Consultation & Advice about a child/young person resident in the City of Westminster**

▪ **Westminster Duty Line**

Duty Line: 020 7641 4000  
Out of hours: 020 7641 6000

▪ **John Griffin** – Child Protection Advisor

Direct Line: 020 7641 1615  
[jgriffin@westminster.gov.uk](mailto:jgriffin@westminster.gov.uk)

▪ **Gabby Bernard** – Child Protection Advisor

Direct Line: 020 7641 3195/07903 154 517  
[gbernard@westminster.gov.uk](mailto:gbernard@westminster.gov.uk)

- **Charlotte Holt** – Child Protection Advisor

Direct Line: 020 7641 5364  
[cholt@westminster.gov.uk](mailto:cholt@westminster.gov.uk)

- **Leonie Bingham** – Child Protection Advisor

Direct Line: 020 7641 4199  
[lbingam@westminster.gov.uk](mailto:lbingam@westminster.gov.uk)

**Contact details for the Bi-Borough Local Authority Designated Officer (LADO) for referral and management of allegations against staff**

**Aqualma Daniel** – Bi Borough Safe Organisations Manager and Local Authority Designated Officer (LADO)

Direct Line: 07870 481712  
[KCLADO.Enquiries@rbkc.gov.uk](mailto:KCLADO.Enquiries@rbkc.gov.uk)

Make LADO referrals to the following phone numbers/emails depending on the borough where the incident took place or where the employing agency is.

Unsure? Send it in and we will ensure it gets to the right person. Referrals are dealt with by Child Protection Advisors who hold delegated LADO powers across all three boroughs.

**London Borough of Hammersmith and Fulham:** 0208 753 5125/  
[LADO@lbhf.gov.uk](mailto:LADO@lbhf.gov.uk)

**Westminster:** 020 7641 7668/ [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk)

**Kensington:** 020 7361 3013/ [KCLADO.Enquiries@rbkc.gov.uk](mailto:KCLADO.Enquiries@rbkc.gov.uk)

**Local Safeguarding Children's Board (LSCB) for Hammersmith & Fulham, Kensington & Chelsea and City of Westminster**

- **Emma Biskupski** – Bi Borough LSCB Business Development Manager (Interim)  
Direct Line: 020 8753 3759  
[emma.biskupski@lbhf.gov.uk](mailto:emma.biskupski@lbhf.gov.uk)

**Bi Borough ACE Team:**

- **Elizabeth (Liz) Spearman** - Bi Borough Head of ACE  
Direct Line: 020 7745 6610  
[Elizabeth.Spearman@lbhf.gov.uk](mailto:Elizabeth.Spearman@lbhf.gov.uk)
  
- **Richie Adeyeye** - Bi Borough Lead Advisor (FPNs and Child Employment enquiries)  
  
Direct Line: 020 7641 7616/020 7745 6611  
[Richie.Adeyeye@rbkc.gov.uk](mailto:Richie.Adeyeye@rbkc.gov.uk)
  
- **Kyria Parsons** – Lead Advisor (EHE enquiries)  
Direct Line: 020 7745 6615  
[Kyria.Parsons@rbkc.gov.uk](mailto:Kyria.Parsons@rbkc.gov.uk)
  
- **Kathy Costello** – Bi Borough Children Missing Education (CME) and Data Officer  
Direct Line: 020 7745 6613/07833 295 386  
[Kathy.Costello@lbhf.gov.uk](mailto:Kathy.Costello@lbhf.gov.uk)
  
- **Paul Worts** – Bi Borough Senior Exclusions Officer  
Direct Line: 020 7745 6614  
[Paul.Worts@rbkc.gov.uk](mailto:Paul.Worts@rbkc.gov.uk)

**Contact details for Youth Offending Services in Hammersmith & Fulham, Kensington & Chelsea and City of Westminster**

- **Elaine Weldon** – The Royal Borough of Kensington and Chelsea Service Manager  
Direct Line: 020 7598 4712/07976 060 126  
[Elaine.Weldon@rbkc.gov.uk](mailto:Elaine.Weldon@rbkc.gov.uk)
  
- **Alison Sabaroche** – Hammersmith and Fulham Service Manager  
Direct Line: 020 8753 4602  
[Alison.Sabaroche@lbhf.gov.uk](mailto:Alison.Sabaroche@lbhf.gov.uk)
  
- **Kiran Hayer** – Westminster Service Manager

020 7641 5390  
[khayer@westminster.gov.uk](mailto:khayer@westminster.gov.uk)

### **Safeguarding and child protection contacts for Bi Borough of Kensington & Chelsea/Westminster City Council**

The Local Police Station is Belgravia Police Station, 202 Buckingham Palace Rd, Belgravia, SW1W 9SX which is open Monday to Sunday 8am to 10pm. Dial 101 for non-emergency contact.

The DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors on extremism is 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

The following telephone numbers may be useful for pupils:

**Childline** - 0800 1111

**NSPCC** – 0808 800 5000

**Ofsted's Whistle-blower Hotline** – 0300 123 3155

**Forced Marriage Unit** – 0207 008 0151 ([fmufco@fco.gov.uk](mailto:fmufco@fco.gov.uk))



## Policy

### 1 Safeguarding – a definition

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children are growing up in circumstances that are consistent with the provision of safe and effective care;
- Taking action to enable all children to flourish and to achieve their full potential as people and as members of the school and of the wider community.

The aim of safeguarding is to enable children to have optimum life chances and to enter adulthood successfully.

### **What’s the difference between Safeguarding and Child Protection?**

Safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a school should do for all children; Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or are at significant risk of being harmed. Policies and procedures for Child Protection are, therefore, included in the Safeguarding policy and procedures.

Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this should be reported to children’s social care immediately. Action should also be taken to promote the welfare of children who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances should be addressed through inter-agency assessment using local processes.

### **The role of the school staff with regards to child centred and co-ordinated approach**

Safeguarding and promoting the welfare of children is everyone’s responsibility and all persons working with children should maintain an attitude of ‘it could happen here’. In order to fulfil this responsibility effectively, all staff and persons involved with children should make sure their approach is children-centred and at all times should consider what is in the best interest of the child.

Staff should be prepared to identify children who may benefit from early help, which means providing support as soon as a problem emerges at any point in a child’s life.

Staff recognise that a child is likely to disclose an allegation to someone they trust, this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust

## Policy statement

1.1 The Proprietor of Knightsbridge School is Dukes Education Limited acting through its Board of Directors

1.2 The School's Safeguarding Child Protection Policy and Procedures has regard to statutory guidance: *Keeping Children Safe in Education 2023*, including the *Disqualification under the Childcare Act 2006* (February 2015), EYFS Framework 2023 and *What to do if you're worried a child is being abused* (March 2015), *Prevent Duty: departmental advice for schools and childminders* (June 2015), *Working Together to Safeguard Children 2018 (updated 2022)*, *The use of social media for on – line radicalisation* (July 2015) and:

1.2.1 has been authorised by the proprietor of the School and has been fully implemented in practice;

1.2.2 is published on the School website and available in hard copy to parents on request;

1.2.3 can be made available in large print or other accessible format if required;

1.2.4 its procedures apply wherever staff, Directors, Advisors or volunteers are working with pupils even where this is away from the School, for example an educational visit;

1.2.5 the policy also applies to the Early Years Foundation Stage (EYFS).

1.2.6 This policy should be read in conjunction with the school's [Safer Recruitment Policy](#), the Staff Code of Conduct, Whistleblowing Policy, Keeping Children Safe in Education May 2022 Part1 & Annex A, Anti-bullying, ICT and E-safety, Behaviour and Discipline Policy, Physical Restraint Policy and Child-on-Child Abuse Policy..

1.3 Every pupil should feel safe and protected from any form of abuse and know that abuse is abuse and should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'. The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The School will take all reasonable measures to:

1.3.1 ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including Advisors and staff commissioned by the school from any external from another organisation) to work with children and young people in accordance with the guidance given in Keeping Children Safe in Education, the Education (Independent School Standards) (England) Regulations 2014 and the Statutory Framework for the Early Years Foundation Stage. See also the School's separate Safer Recruitment Policy;

1.3.2 ensure that staff from another organisation who are working with our pupils on another site will have been subject to appropriate child protection checks and procedures including safer recruitment requirements and DBS checks;

1.3.3 follow the local inter-agency procedures of Local Safeguarding Children Board for the two Local Authorities of Kensington and Chelsea and Westminster

1.3.4 be alert to signs of abuse both in the School and from outside and to protect each pupil from any form of abuse, including instances where there is a concern that a child or young person may be at risk of being radicalised or drawn into extremism or Child Sexual Exploitation or Child Criminal Exploitation whether from an adult or another pupil;

1.3.5 Recognise that children with special educational needs and disabilities can be more prone to peer group isolation than other children and will consider extra pastoral support for those children.

1.3.6 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;

1.3.7 promote safe practice and professional conduct to safeguard children within the organisation and to mitigate against the potential for misunderstandings or situations being misconstrued so teachers and other staff are not vulnerable to allegations;

1.3.8 be alert to the medical needs of children including those children with longer term medical conditions;

1.3.9 address both the mental and emotional welfare of children and families through the provision of individual counselling at Place2Be and a group/individual listening service at Place2Talk

1.3.10 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

1.3.11 teaches pupils about keeping themselves safe, for example through use of online resources and through the curriculum and Life Skills (PSHEE) which incorporates peer-on-peer abuse. The Life Skills curriculum also covers relationship, health and sex education (RHSE) and e-safety (see the [ICT and E-safety policy](#)). All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Children need to adjust their behaviour in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Children are taught to understand the risk posed by adults or young people, who use the internet, to bully, groom, abuse or radicalise other people.

1.3.12 take all practical and appropriate steps to ensure that School premises are as secure as circumstances permit;

1.3.13 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area; and

1.3.14 not knowingly employ people to work in child care or allow them to be directly concerned in its management, if they have been Disqualified or others who live or work within their homes meet the criteria outlined within the Disqualification by Association guidance (see Safer Recruitment policy)

1.3.15 ensure appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online (see ICT and E-Safety Policy and KS Policy for Providing Online Learning)

1.4 Keeping Children Safe in Education provides that the inspection of independent schools will ensure that the Independent School Standard which concerns the welfare, health and safety of children is met.

## **2 The Designated Safeguarding Lead**

**In 2023-24 the DSL is Mrs Gillian Conlon. The DDSLs are Mr Domingo Benasco Perez and Mrs Francesca Torrigiani-Spagnoli.**

2.1 The School has appointed a member of staff on the School's leadership team with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to child protection and welfare, including overall responsibility for E-Safety, and the Prevention of Radicalisation, with arrangements for the Deputies Designated to act on the Designated Lead's absence.

2.2 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or multi-agency meetings and to contribute to the assessment of children The school fully contributes to inter-agency working in accordance with the LSCB including MASH, TAC & CAF and the Designated Safeguarding Lead has undertaken multi-agency training with the Bi-borough Team.

2.3 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School. If preferred, parents may discuss concerns in private with the child's form teacher or the Head who will notify the Designated Safeguarding Lead in accordance with these procedures.

2.4 The name and contact details together with the main responsibilities of the Designated Safeguarding Lead are set out at the start of this policy

2.5 If the Designated Safeguarding Lead is unavailable her duties will be carried out by the Deputy Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead's details are also set out in Appendix 1. In this policy, reference

to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Designated Safeguarding Lead is unavailable.

2.6 The DSL has the lead responsibility for understanding the filtering and monitoring systems at school.

### **3 Duty of employees, the Proprietor, Advisors and volunteers**

3.1 Every employee, Director, Advisor and volunteer of the School is under a general legal duty:

3.1.1 to protect children from abuse;

3.1.2 to be aware of the terms and procedures in this Policy including early help and the referrals process and to follow them;

3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;

3.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and to always report any matters of concern without delay to the Designated Safeguarding Lead.

3.2 The school must ensure that:

3.2.1 the DSL has a clear job description and the proprietor ensures that the DSL has sufficient time, funding, supervision and support to fulfil his or her child welfare and safeguarding responsibilities effectively.

3.2.2 the proprietor considers how pupils may be taught about safeguarding, including online, through the curriculum and PSHEE and RSE (Life Skills & Perspectives). child on child abuse is embedded in the Life Skills curriculum, for example when covering peer relationships and e-safety. It will be adapted where appropriate to cover child on child sexual violence and sexual harassment. Pupils need to adjust their behaviours in order to reduce risk and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet (further guidance is provided Appendix A3 of the Schools Behaviour Policy). In particular, pupils must understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

3.3 The School's child protection procedures are not intended to prevent any person from making an immediate referral to children's social care if there is a risk of immediate serious harm to a child without parental consent having to be obtained

3.4 The proprietor ensures that the School's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Children Board for the two Local Authorities of the two Local Authorities of Kensington and Chelsea and

Westminster. The Proprietor manages child protection incidents and liaises with external agencies where this is required eg if an allegation is made against the Principal. The Proprietor is Aatif Hassan

3.5 A designated teacher will be appointed by the Proprietor to promote the educational achievement of any children who are “looked after” by a Local Authority. The Proprietor will ensure that staff have the skills, knowledge and understanding necessary to keeping “looked after” children safe. In particular they will ensure that the information they need in relation to the child's “looked after” status, his / her care arrangements and the levels of authority delegated to the carer by the authority looking after him / her is made available to them.

### 3.6 Training

3.6.1 Induction - All staff, including temporary staff and volunteers, will be provided with induction training on the day that the person starts work, if not before. This includes:

- this policy;
- The staff code of conduct which covers the staff/pupil relationship and communication including the use of social media, including the Whistleblowing procedures;
- the identity and role of the Designated Safeguarding Lead, Deputy and Safeguarding team;
- child protection training in accordance with Royal Borough of Kensington and Chelsea Safeguarding Children Board procedures; and will include the risk of radicalisation and extremism, Child Sexual Exploitation (CSE) and Child Criminal Exploitation. (CCE)
- a copy of Part 1 and Annexe A of Keeping Children Safe in Education and Annexe B for all staff working directly with children.
- Pupil Behaviour
- Online Safety
- How to manage a report of child on child sexual violence and sexual harassment
- Procedures for children who go missing from education

### 3.6.2 Child protection training

All staff including school leaders, external providers, volunteers and all those working directly with children, will receive a copy of this policy and KCSIE Sept 2023 Part 1 & Annexe A and B and will be required to confirm that they have read and understood

them. In the event of any updates, all staff will be updated and further confirmation that they have read the new version will be required

All staff will receive refresher training in:

- The staff code of conduct which covers the staff/pupil relationship and communication including the use of social media, including the Whistleblowing procedures;
- the identity and role of the Designated Safeguarding Lead, Deputy and Safeguarding team;
- a copy of Part 1 and Annex A and B of Keeping Children Safe in Education.
- Pupil Behaviour
- Online Safety
- How to manage a report of child on child sexual violence and sexual harassment
- Procedures for children who go missing from education
- How to raise low level concerns

Following consultation with the Local Safeguarding Children Board (LSCB) for the two Local Authorities of Kensington and Chelsea and Westminster, all staff members and the Proprietor will undertake appropriate child protection training regularly, annually for all staff and every 2 years for the Safeguarding Team in line with requirements within Keeping Children Safe in Education September 2023 which will include local inter-agency protocols and training in the LSCB for the two local authorities' approach to Prevent duties.

All staff undertake Prevent training annually and Knightsbridge School liaises with Di Donaldson, the Bi-Borough Safeguarding and Child Protection Schools and Education Officer for Safeguarding:Child Protection training. The staff also undertake on-line training through Educare.

The safeguarding team revisit the policy and procedures through the year in twilight sessions and through team meetings.

### 3.6.3 Designated Safeguarding Lead

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken higher level child protection training and training in inter-agency working, training in the LSCB's approach to Prevent duties, and will attend refresher training at two yearly intervals. For further details about the training of the Designated Safeguarding Lead, see Appendix 1.

3.6.4 All training will be carried out in accordance with the Local Safeguarding Children Board for the two Local Authorities of Kensington and Chelsea and Westminster to ensure quality assurance .

### 3.7 Disqualification

3.7.1 KCSiE incorporates the Disqualification under the Childcare Act 2006 (Feb 2015) updated in 2019 with regard to how people can be disqualified.

3.7.2 Knightsbridge School never knowingly allows people to work in childcare or in the school as a whole or allows them to be directly concerned in its management, if they are 'disqualified'. This guidance does not only apply to employees but also includes volunteers, supply/agency staff, self-employed people, and staff of other organisations contracted to provide childcare.

3.7.3 The grounds for disqualification include being on the DBS Children's Barred List; being cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad; being the subject of certain other orders relating to the care of children; refusal or cancellation of registration relating to childcare or children's homes or being prohibited from private fostering

3.7.4 Knightsbridge School will remind all relevant people regularly of their duties to disclose information about disqualification; all staff, whether they are involved in childcare or not, are requested to sign a form on an annual basis declaring that they are not disqualified from working with children under the requirement of the Childcare Act 2006 (Feb 2015 updated Sept 2018). The school will keep all such records and show also on the Single Central Register all staff employed to work at Knightsbridge School and including the date disqualification checks were completed.

3.7.5 In taking steps to gather information, staff can be expected to disclose all their convictions and cautions including those which are spent but cannot be required to disclose spent convictions and cautions of those who live and work in their households. By definition, a person who is disqualified cannot lawfully do the work from which they are disqualified. If a person is found to be disqualified, or if there is doubt over that issue, then pending resolution they must be removed from the work from which they are or may be disqualified. There is no requirement automatically to suspend or dismiss all individuals found to be disqualified; there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the Designated Officer, Local Authority (LADO) when appropriate.

3.7.6 Knightsbridge School will inform Ofsted (not ISI, although ISI can be copied in) where they are satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Staff who are disqualified, may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.



## 4 Procedures

### 4.1 Complaints of abuse

4.1.1 Every complaint or suspicion of abuse, including child on child, sexting and any other relevant issues from within or outside the School will be taken seriously and that abuse is abuse and should never be tolerated or passed off as 'banter' or just having a laugh' or 'part of growing up' and action taken in accordance with this policy.

4.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware :-

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Physical and Emotional Neglect
- Bullying (off and online)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploration (CCE) including County Lines
- Honour Based Abuse
- FGM
- Forced Marriage
- Pupils Missing from Education
- Pupils in Danger of Significant Harm / Serious Violence
- Pupils at Risk of Radicalisation
- Child on child Abuse including sexual violence and sexual harassment (including the sharing on explicit images online and Upskirting)
- Racial Abuse
- Domestic Abuse

#### Mental Health Issues as a sign of possible Safeguarding Concerns

Further details are set out in Appendix 2 of this document and in Appendix A of KCSiE Sept 2023. Staff should also refer to: Mental health and behaviour in schools: departmental advice (Nov 2018) and Promoting children and young people's emotional health and wellbeing (March 2015)

4.1.3 If a member of staff is concerned that a pupil may be suffering harm or any abuse including child on child abuse by gangs and domestic violence the matter should be referred to the Designated Safeguarding Lead as soon as possible. If a member of staff suspects or hears a complaint of abuse, the procedures set out in Appendix 3 must be followed.

4.1.4 If at any point there is a risk of immediate serious harm a referral should be made to Children's Social Care without delay. Anybody can make a referral without parental consent having to be obtained

4.1.5 If a member of staff in the course of their work discovers that an act of FGM (Female Genital Mutilation) appears to have been carried out on a girl under the age of 18, then this must be reported to the police

## **4.2 Action by the Designated Safeguarding Lead**

4.2.1 On being notified of a complaint or suspicion of abuse, including radicalisation or Child Sexual Exploitation or child on child abuse including sexting and any other relevant issues, the action to be taken by the Designated Safeguarding Lead will take into account:

4.2.1.1 the local inter-agency procedures of the Local Safeguarding Children Board for the Two Local Authorities of Kensington and Chelsea and Westminster.

4.2.1.2 the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the police immediately as well as Children's Social Care

4.2.1.3 the child's wishes or feelings; and

4.2.1.4 duties of confidentiality, so far as applicable.

4.2.2 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with Child Protection Advisors with Kensington and Chelsea Safeguarding Team on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Children's Social Care will be made without delay without parental consent having to be obtained

4.2.3 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to Children's Social Care within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact Children's Social Care again to clarify the position.

4.2.4 In circumstances where a child has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with the Early Help Service within Children's Social Care and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.

## **4.3 Dealing with allegations against staff, the Proprietor, Advisors and volunteers**

4.3.1 The School has procedures for dealing with allegations against staff, the Proprietor, Advisors, and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of Keeping Children Safe in Education.

4.3.2 The Designated Officer(s) at the local Authority will be informed immediately and in any event within one working day of all allegations against staff and volunteers that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.

4.3.3 Should Knightsbridge School find reasons to cease using a person's services, it would be for the following reasons: dismissal through the school's disciplinary process; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

4.3.4 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. This guidance concerning professional conduct is contained in the Staff Handbook and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

4.3.5 Further guidance to staff is given in the Staff Code of Conduct

4.3.6 The School's Whistleblowing Policy sets out the procedure for reporting wrongdoing by staff in the workplace including the safeguarding and welfare of children if the person raising the concern does not believe the matter is being addressed. There are 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. Training is provided to staff at the beginning of the year Inset. At all times there is transparency and accountability in relation to how concerns are received and handled.

4.3.7 Staff are required to log low level concerns regarding the behaviour of their peers or themselves with the DSL. What constitutes a low level concern is outlined in the Code of Conduct, Staff Handbook and is addressed during the Safeguarding briefing during Inset/induction.

#### **4.4 Allegations against pupils (including those by other pupils):**

4.4.1 A pupil against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

4.4.2 Child on child abuse where there is a risk of significant harm will be treated as a child protection concern and will be reported to the Bi borough in accordance with

this policy and which Borough they live in. Where the risk is not deemed to be significant, the school's behaviour policy and sanctions will be applied.

4.4.3 The School will seek advice from Children's Social Care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

4.4.4 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children's Social Care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to exclude him / her during the investigation. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the LCSB and/or the Police as appropriate

4.4.5 Harmful sexual behaviour which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia may be reported to the Police. Rape, assault by penetration and sexual assaults will be passed to the Police.

4.4.6 If the DSL decided to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered

4.4.7 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and will have access to Place 2 Be, Support from external agencies if relevant and have the support of the school's pastoral support teams including the Wellbeing Lead.

#### **4.5 Children missing from education procedures**

Knightsbridge school ensures that every child has 3 possible responsible adults who can be contacted if this child is missing from school. If none of these can be contacted and given the schools' knowledge of the family situation then the following will apply:-

4.5.1 Knightsbridge School shall inform the applicable local authority (within which the pupil resides when not at Knightsbridge School) of any pupil who is going to be deleted from the admission register where he or she:

- Has been taken out of school by his/her parents and are being educated outside the school system e.g home education
- has ceased to attend Knightsbridge School, leaving the school at a non-standard exit point
- has been certified by a doctor as unlikely to be in a fit state of health to attend Knightsbridge School before ceasing to be of compulsory school age, and neither

he/she nor his/her parent has indicated the intention to continue to attend Knightsbridge School after ceasing to be of compulsory school age

- is in custody for a period of more than four months due to a final court order and Knightsbridge School does not reasonably believe he/she will be returning at the end of the period or has been permanently excluded

4.5.2 The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to: fulfil its duty to identify pupils of compulsory school age who are missing in education and follow up with any pupil who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Knightsbridge School shall inform the applicable local authority of any pupil who fails to attend regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between Knightsbridge School and the local authority (or in default of such agreement, at intervals determined by the secretary of state).

#### **4.6 Informing parents**

4.6.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the LADO, Children's Social Care and / or the police before discussing details with parents e.g. concerns regarding possible sexual abuse.

4.6.2 See also section 10 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head, or Principal, of the School.

#### **5 Visiting speakers**

5.1 Any visiting speakers coming into Knightsbridge School will require a risk assessment to be carried out.

5.2 All visiting speakers will be checked for suitability and will be appropriately supervised. If necessary, these checks will include an internet search as per the Prevent duty.

5.3 An ID will be requested from any visiting speaker outside the school community.

5.4 A list of visiting speakers will be compiled by HR (Natalie Barker).

#### **6 Secure school premises**

6.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit. Reviews will take place on a regular basis.

The School keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. If necessary, visitors will be asked for proof of identity.

6.2 The School's ICT and E Safety Policy including the EYFS setting, covers the use of mobile devices and is as follows:

6.2.1 The School's Acceptable Use Policy sets out the expectations on pupils from Year 1 to Year 10. Due to the EYFS setting, pupils are not permitted to keep mobile phones or any mobile device with a camera facility with them while on the premises - these are handed in to reception in the morning and returned at dismissal.

6.2.2 Staff and volunteers should use mobile phones and cameras in accordance ICT and E-Safety Policy as detailed below:-

- Staff mobile phones or communications devices must be switched off or kept on silent and out of sight of pupils at all times, except when necessary to conduct duties off-site or in the event of an emergency
- Mobile phones and any personally-owned communication devices should not be used during lessons or formal school time. They should be switched off or on silent at all times, and should never be used for personal reasons except in the staff room/offices
- No images or videos should be taken on personally-owned mobile devices without the prior consent of the person(s) concerned and in the case of pupils, without the consent of a teacher or supervising member of staff; any images taken in school must be downloaded from the device and deleted from the device before the end of the day
- Staff should use school provided ICT facilities for making contact with parents, guardians or pupils when outside of school. In limited circumstances, such as school visits and trips, staff may have to use personal mobile phones for school business but only within the bounds of their professional capacity
- In the event of the above, staff should hide their own mobile number (by either configuring their caller visibility or first inputting 141) for confidentiality purposes
- The Bluetooth or similar peer connectivity functionality of mobile phones or communications devices should be 'hidden' or switched off at all times and not be used to send images, files or messages to others mobile phones or to connect with other devices
- If members of staff have an educational reason to allow children to use mobile phones or a personally-owned device as part of an educational activity then it will only take place when approved by a member of the senior management team

- School mobile phones are available for staff use on trips
- Safeguarding policies and procedures should be followed and appropriate referrals to external agencies should be made when a third party organisation or individual is using the school's premises.

6.2.3 Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

6.2.4 Parents should not use their mobile phones for any other purpose while on school premises.

#### Searching Pupils

- School staff can search a pupil for any item if the pupil agrees.
- The Head and staff authorised by them have a statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have a prohibited item. Prohibited items are:
  - knives or weapons
  - alcohol
  - illegal drugs
  - stolen items
  - tobacco and cigarette papers and e-cigarettes/vaping
  - fireworks
  - pornographic images
  - any article that the member of staff reasonably suspects has been, or is likely to be, used:
    - to commit an offence, or
    - to cause personal injury to, or damage to the property of, any person (including the pupil).
- The Head and authorised staff can also search for any item banned by the school rules which has been identified in the rules as an item which may be searched for.

## 7 Confidentiality and information sharing

7.1 The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will cooperate with Children's Social Care and police to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children (2018).

7.2 Where allegations have been made against staff, the School will consult with the LADO and directly with the police where appropriate to agree the information that should be disclosed and to whom.

## **8 Monitoring and review**

8.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor and the Advisors. Any child protection incidents at the School will be followed by a review of these procedures by the Designated Safeguarding Lead and a report made to the proprietor. This will be discussed by the Governance committee at the next meeting. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

8.2 In addition, the Safeguarding Governor (on behalf of the Proprietor) will come into the school and work alongside the Designated Safeguarding Lead to ensure that there is a thorough review of this policy annually. The outcome of the annual review by the Designated Safeguarding Lead and the Proprietor will be reported to the Governance committee who will review this Policy and the implementation of its procedures, including securing good cooperation with local agencies, and consider the proposed amendments to the Policy, from both the Designated Safeguarding Lead and its own members, before giving the revised Policy its final approval. Detailed minutes recording the review by the Governance committee and Proprietor will be made. See also 3.3 above

8.3 The Proprietor and the DSL together ensure that a review of the school's child protection policies take place annually, including an update and review of the effectiveness of procedures and their implementation and that there is good communication with the Local Safeguarding Children Board for the two Local Authorities of the two Local Authorities of Kensington and Chelsea and Westminster. A report is submitted annually to the Governance committee and the Proprietor including training records, referral information in respect of requests for help and support for individual children (anonymised), issues and themes which may have emerged in the school and how they have been handled. The minutes of the Governance are sufficiently detailed to demonstrate the depth and breadth of this review.



8.4 The Proprietor makes sure that the policy is known in practice by visiting the school and talking to a number of staff right across the school to see if they would know who to go to in cases of suspected abuse and what needs to be said in terms of comments they might make to a child.

8.5 In addition, the proprietor is kept up-to-date about how pupils are taught about safeguarding, including the concerns about possible radicalisation and the use of social media for on-line radicalisation

### **9. Contacts: Safeguarding and child protection contacts for Bi Borough of Kensington & Chelsea/Westminster City Council – See The start of this policy.**

Also:

The Local Police Station is Belgravia Police Station, 202 Buckingham Palace Rd, Belgravia, SW1W 9SX which is open Monday to Sunday 8am to 10pm. Dial 101 for non-emergency contact.

The DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors on extremism is 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

9.1 The following telephone numbers may be useful for pupils:

**Childline** - 0800 1111

**NSPCC** – 0808 800 5000

**Ofsted's Whistle-blower Hotline** – 0300 123 3155

**Forced Marriage Unit** – 0207 008 0151 ([fmufco@fco.gov.uk](mailto:fmufco@fco.gov.uk))

## **Appendix 1**

In accordance with Keeping Children Safe in Education (2020), the main responsibilities of the Designated Safeguarding Lead are:

### **The Designated Safeguarding Lead**

1 The Designated Safeguarding Lead for the School site including the EYFS setting is Mrs Gillian Conlon, Head of Nursery & SMT Member who may be contacted on 0207 590 9000.

2 The Deputy Designated Safeguarding Leads are Mr Domingo Benasco Perez and Ms Francesca Torrigiani-Spagnoli, who may be contacted on 0207 590 9000.

3 E-safety is the overall responsibility of the DSL supported by the Head of Computing, Mr Rob Conway.

### **3.1 Managing referrals**

(a) To take lead responsibility for referring to the Local Authority Designated Officer (LADO) all child protection concerns which involve a member of staff.

(b) To take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) and to the DfE & Teaching Regulation Agency (TRA) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child (advice about whether an allegation against a teacher is sufficiently serious to refer to the DfE & TRA can be found in Teacher misconduct: the prohibition of teachers (July 2018)

(c) To take lead responsibility for making referrals to Children's Social Care and the police where a crime may have been committed which involves a child.

(d) Liaising with the Head in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School.

(e) To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

### **1.2 Raising awareness**

(f) Ensure this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governance committee and Proprietor regarding this. See 7. Monitoring and review above

(g) Ensure this Policy is available publicly by posting it on the parents' forum and the school website, and making it available by request from the school office.

(h) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Children's Social Care without parental consent having to be obtained

(i) Maintain links with the Local Safeguarding Children Board for the Local Authorities of Kensington and Chelsea and Westminster to ensure staff are aware of training opportunities and the local policies on safeguarding.

(j) When children leave the School ensure their child protection file is copied for any new school or college as soon as possible but transferred securely separately from the main pupil file.

The DSL is the person responsible for the prevention of radicalisation

4 The Designated Safeguarding Leads (Deputies) will carry out this role where the Designated Safeguarding Lead is unavailable.

5 The Designated Safeguarding Lead and Deputies have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:

5.1 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;

5.2 have a working knowledge of how local authorities conduct a child protection case conference, core group meetings and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

5.3 ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;

5.4 be alert to the specific needs of children in need, including those with special educational needs, who may be more vulnerable, and young carers;

5.5 be able to keep detailed, accurate, secure written records of concerns and referrals;

5.6 obtain access to resources and attend any relevant or refresher training courses;

5.7 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 and to meet the requirements and procedures of the Local Safeguarding Children Board for the Local Authorities of Kensington and Chelsea, and Westminster

## **Appendix 2**

### **Types and signs of abuse**

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

## Types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (child on child abuse). Abuse can take place wholly online or technically can be used to facilitate offline abuse as well as sex abuse by children. Part one of Keeping Children Safe in Education defines the following types of abuse.

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

### Signs that may indicate physical abuse:

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft areas of the face such as cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings
- Injuries to genital areas

Injuries need to be accounted for. Inadequate, inconsistent or what may seem like excessively plausible explanations, or a delay in seeking treatment, should signal concern.

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

**Signs that may indicate emotional abuse:**

- Over-reaction to mistakes
- Lack of self-confidence / esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and / or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection
  
- Changes in the mental health of a child or young person.

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

**Signs that may indicate sexual abuse:**

- Sudden changes in behaviour and school performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need for constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Bed wetting / incontinence
- Unexplained gifts or money
- Depression or withdrawal
- Fear of undressing for gym activities
- Sexually transmitted disease
- Fire setting

It is important to note that there may be no signs.

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

abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Signs that may indicate neglect:**

- Excessive hunger
- Poor personal hygiene
- Frequent tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight (the same applies to weight gain or being excessively overweight)
- Low self esteem
- Poor dental hygiene

**5. Bullying:** this may be defined as repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. It may be deliberate harassment or an aggressive act of omission which causes physical or psychological hurt. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction.

**Bullying can include:**

- Physical: pushing, hitting, kicking, pinching etc.
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm
- Emotional: tormenting, ridiculing, humiliating, ignoring
- Racial: taunts, graffiti and gestures
- Religious / cultural
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments
- Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email
- child on child abuse including particular consideration to vulnerabilities of those with SEN/D

**Signs that may indicate bullying:**

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school etc.
- A marked drop off in performance at school
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol
- A shortage of money or frequent loss of possessions.

The school's anti-bullying policy sets out the details of the policy and procedures that are in place in order to prevent bullying and to deal with it if and when it occurs within the school.

### **Child-on-child abuse (See Child-on-child Abuse Policy)**

- Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but not limit to):
  - o Bullying (including cyber bullying)
  - o Sexual violence and sexual harassment
  - o Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
  - o Sexting and initiation/hazing type violence and rituals

### ***Keeping Children Safe in Education* also acknowledges the following as specific safeguarding issues:**

**7a Child sexual exploitation (CSE):** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **Signs that may indicate child sexual exploitation:**

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;

- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Such indicators may be spotted when speaking to the young person or to family or friends.

### 7.b. Child Criminal Exploration (CSE)

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

“Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.”

Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person’s vulnerability include:

- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues
- being in care (particularly those in residential care and those with interrupted care histories)
- being excluded from mainstream education, in particular attending a Pupil Referral Unit.

## 8. Honour Based Abuse



So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abused (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead. 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

### *Indicators*

There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

### *Actions*

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

**9. Female genital mutilation:** FGM, as a cultural or religious phenomenon practised in certain communities and in certain parts of the world, involves procedures that intentionally alter or injure the female genital organs for non-medical reasons. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK, and a form of child abuse with long-lasting harmful consequences. 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. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

#### **Circumstances that may point to FGM happening:**

- A child talking about getting ready for a special ceremony

- A child's family taking a long trip abroad
- A child's family being one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghanistan, Kurdistan, Indonesia and Pakistan)
- Knowledge that a sibling has undergone FGM
- A child talking about going abroad to be 'cut' or to prepare for marriage

### **Mandatory Reporting Duty**

With effect from October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Under this duty, teachers must now report to the police cases where they discover that an act of FGM appears to have been carried on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

### **10. Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **11. Children missing from education**

All staff should be aware that children going missing or who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

**Pupils who run away or go missing:** as soon as it is discovered that a pupil has run away or gone missing, the parents will be contacted. If the pupil cannot be found, the LCSB will be contacted and their advice followed.

**12. Pupils who are in danger of significant harm and those that are in need:** the school will differentiate between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. The former will be reported to Children's Social Care immediately; the latter should lead to inter-agency assessment using local processes, including use of the Common Assessment Framework (CAF) and the Team Around Child (TAC) approaches.

### **13. Radicalisation:**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The Government's Prevent Strategy 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 people with different faiths and beliefs'. The definition also includes 'calls for the death of members or our armed forces in this country and overseas'.

This is wholly in keeping with our school ethos and approach to promote a broad, tolerant and open minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra and co-curricular activities, or in any other aspect of the school's activities.

In line with Government guidance, we see the Prevent Duty as being an integral part of our duty of care and of our Safeguarding responsibilities towards our students, including promoting British Values. Just as we need to be vigilant about signs of possible physical, emotional, sexual and other types of abuse, so we need to be alert to signs of any of our students being at risk of being radicalised or drawn into extremism.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised. Any such concerns must, therefore, be reported without delay to the DSL.

If any pupils are identified as being at risk of radicalisation, the level of risk will need to be ascertained to identify the most appropriate referral, which could include Channel or Children's Social Care.

Although decisions to seek support for a pupil in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, if there are reasonable grounds to believe that a pupil is at risk of significant harm, parental consent will not be required.

Whilst we consider the school low risk, we will continue to monitor behaviour in conjunction with our existing curriculum and pastoral policies.

### **Possible signs of extremism/radicalisation include:**

#### **Vulnerability**

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

#### **Access to extremism / extremist influences**

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?

- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### **Experiences, Behaviours and Influences**

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside the UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

### **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

### **Social Factors**

- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?

- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist views or sympathies?

**More critical risk factors could include:-**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

The Local Safeguarding Children Board for the local Authorities of Kensington and Chelsea and Westminster and the NSPCC website are good sources of information and advice.

#### 14. Domestic Abuse

The school adheres to the cross-government definition of domestic violence and abuse, which is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are,

or have been, intimate partners or family members regardless of gender or sexuality.

Domestic abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and vulnerable young people; those affected may blame themselves, feel isolated, scared or ashamed of what is happening, and may experience disruption associated with factors such as sudden house moves. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Domestic abuse can be difficult to spot as it usually takes place within the family home and abusers are often adept at masking their behaviour in public. Children witnessing domestic abuse is recognised as 'significant harm' in law and staff should be alert to any unusual behaviour or sudden changes in behaviour such as increased aggression, anti-social behaviour or anxiety.

### **Child on child abuse. Children can abuse other children.**

This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### **Context**

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 physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

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

### **What is Sexual violence and sexual harassment?**

#### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/105 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

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

**What is consent?** 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.

#### **Sexual harassment**



When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

### **Upskirting**

'Upskirting' 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. It is now a criminal offence.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by domestic reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the guidance in 4.1.3. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). Additional advice and support Abuse or Safeguarding issue Link to Guidance/Advice Source

Abuse What to do if you're worried a child is being abused DfE advice Domestic abuse: Various Information/Guidance Home Office Faith based abuse: National Action Plan DfE advice Relationship abuse: disrespect nobody Home Office web

Hazing type violence and rituals :-

**refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups. The initiation rites can range from relatively benign pranks, to protracted patterns that rise to the level of abuse or criminal misconduct. Hazing may include nudity or sexual assault**

### **Gang Abuse - Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>98</sup> should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years; • can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The

guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children with family members in prison**

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

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to children's welfare. Indicators that a family might be at risk of homelessness include:

- Financial hardship
- Domestic abuse
- Anti-social behaviour

## **Appendix 3**

### **Guidance for staff and volunteers on suspecting or hearing a complaint of abuse**

#### **1 Action staff must take**

A member of staff or volunteer suspecting or hearing a complaint of abuse, including child on child abuse:

- Must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
- Must not ask leading questions, i.e. a question which suggests its own answer;
- Must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken; and must keep a sufficient written record of the conversation.

The record should include:

- The date and time;
- The place of the conversation; and
- The essence of what was said (in the child's own words) 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 Safeguarding Lead as soon as possible.

All evidence, for example, notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the Designated Safeguarding Lead.

All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 4 should be followed. If there is a risk of immediate serious harm to a child and it is not possible to report to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead who will consider making a referral to children's social care.

**All reports should be recorded on CPOMS.** Where this is not possible, the primary concern is reporting the incident in the quickest time possible and reports can be given directly to the DSL or DDSL.

## **Appendix 4**

### **Dealing with allegations against members of staff, The Head, Principal, one of the Advisors or volunteers**

#### **1. The School's procedures**

1.1 The School's procedures for dealing with allegations made against staff will be used where the member of staff, the Principal, Head, one of the Advisors or volunteer 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; or
- behaved towards a child or children in a way that indicates they would pose a risk of harm if they worked regularly or closely with children.

1.2 Any allegations not meeting these criteria will be dealt with in accordance with the London Child Protection Procedures and Keeping Children Safe in Education Department for Education Statutory Guidance 2023. In all cases, including "borderline cases", advice will be sought from the LADO.

1.3 All such allegations must be dealt with as a priority so as to avoid any delay.

#### **2. Reporting an allegation against staff or volunteer**

2.1 Where an allegation or complaint is made against any member of staff or volunteer, the matter should be reported immediately to the Head, or in her absence to the Principal. Where appropriate, the Head will consult with the Designated Safeguarding Lead and the Safeguarding Governor - the allegation will be discussed immediately with the LADO before further action is taken.

2.2 No investigation must take place without prior consultation with the LADO team of officers, or in the most serious cases, the police. In borderline cases, discussions with the LADO can be held on a consultation basis without naming the school or individual.

2.3 Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Principal, or in his absence the Proprietor, without first notifying the Head. Again, the allegation will be discussed immediately with the LADO before further action is taken. If the allegation is against the Principal, it should be reported to the Proprietor without first informing either the Head or the Principal. If the allegation is against the Proprietor, it should be reported to the LADO.

2.4 If it is not possible to report to the Head or the Principal in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if they are unavailable, the Deputy Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Proprietor.

2.5 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

### **3. Disclosure of information**

3.1 The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

3.2 The Parents or carers of the relevant child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it based on the advice of the LADO. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.

3.3 Where the LADO advises that a strategy discussion is needed, or the police or Children's Social Care need to be involved, the case manager will not inform the alleged perpetrator or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

3.4 The reporting restrictions preventing the identification of a teacher or other member of staff who is the subject of such an allegation in certain circumstances will be observed.

### **4. Further action to be taken by the School**

4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation through the school's HR/Personnel arrangements. The School will take action in accordance with Keeping Children Safe In Education 2023 and the School's employment procedures.

## **5. Ceasing to use staff**

5.1 If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Board of Directors without delay.

5.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services and a prohibition order may be appropriate, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service and the Dfe & TRA as soon as possible if the criteria are met. The reasons for a prohibition order may include: unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence.

5.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, a referral to the DFE & TRA must also be considered.

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

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

6.2 Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to terminate the child's placement at the School on the basis that they have treated the School or a member of staff unreasonably unless a working relationship based on trust, respect and transparency is established going forward. At all times seeking to work in the interests of the child will be the priority in determining the way forward .

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

## **7. Record keeping**

7.1 Details of allegations found to be malicious will be retained within personnel records to guard against the possibility of the same matter being re referred and potentially requiring re-investigation For all other allegations, full details will be

recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.

## **Appendix 5**

### **Concerns that do not meet the harm threshold/Low level concerns**

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

#### **Low level concerns**

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

**What is a low level concern?** The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
  - being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
  - using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. Staff code of conduct and safeguarding policies

As good practice governing bodies and proprietors should set out their low-level concerns policy within their staff code of conduct and safeguarding policies as set out in Part two of this guidance. They should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and embed a culture of openness, trust and transparency in which the school's or college's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

As set out in Part two of this guidance, the governing body or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

**Schools and colleges can achieve the purpose of their low-level concerns policy by, for example:**

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;



- empowering staff to share any low-level safeguarding concerns with the designated safeguarding lead (or a deputy);
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the school's safeguarding system.

### **Sharing low-level concerns**

Low-level concerns about a member of staff should be reported to the Head.

Schools should ensure they 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 a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the Head, and recorded in accordance with the school's low-level concern/staff code of conduct policy and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Recording low-level concerns**

All low-level concerns should be recorded in writing by the designated safeguarding lead. *A Low Level Concerns Form is available on Teachers Read and G-Drive for this purpose. The form is handed to the Head who is the only person with access to the forms which are stored securely.* The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate

policies could be revised or extra training delivered to minimise the risk of it happening again.

It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

#### References

Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

#### Responding to low-level concerns

Concerns about safeguarding should be reported to the designated safeguarding lead or their deputy. The school or college policy should set out the procedure for responding to reports of low-level concerns.

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

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

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

A good low level concerns policy will simply be a reflection and extension of the school's or college's wider staff behaviour policy/code of conduct. More detailed guidance and case studies on low-level concerns can be found in Developing and implementing a low-level concerns policy ([farrer.co.uk](http://farrer.co.uk)).

**Reviewed by:** Gill Conlon (DSL) and Shona Colaco (Head) July 2023



**Approved by:** Aatif Hassan August 2023



***This policy will be reviewed annually.***