

St Helen's School

Child Protection and Safeguarding Policy

September 2023



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I. Policy statement

1.1 **This policy sets out all the School's Child Protection and Safeguarding procedures in relation to children under the age of 18 who are pupils of St Helen's School.** It has been authorised by the Governing Body and has regard to the following documents:

- *Keeping Children Safe in Education* (September 2023) (hereafter referred to as KCSIE)
- KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (September 2018)
- KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015)
- *Working together to Safeguard Children* (July 2018) (hereafter referred to as WT) (updated December 2020)
- WT refers to the non-statutory advice: *Information sharing* (July 2018)
- *Revised Prevent Duty Guidance: for England and Wales* (April 2021) (Prevent). Prevent is supplemented by:
 - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
 - *The use of social media for on-line radicalisation* (July 2015)
 - *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (February 2021)
- *Preventing and Tackling Bullying* (July 2017)
- *Mental Health and Behaviour in Schools* (November 2018)
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education* (September 2021)
- *Hillingdon Safeguarding Children Partnership arrangements and procedures*

This Policy is published on the School website and available in hard copy to parents on request. This policy can be made available in large print or other accessible formats if required. This policy and its procedures apply wherever staff or volunteers are working with pupils even when this is away from the School, for example on an educational visit. It also applies to the Early Years Foundation Stage (**EYFS**) provision.

1.2 Every pupil should feel safe and protected from any form of abuse. St Helen's School (**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. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Adults in our School will always take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Our staff strive to build trusted relationships with children and young people which facilitate communication. We will always act in the **best interests of the child**.

At St Helen's, pupils are taught about Safeguarding, including on-line safety, through various teaching and learning opportunities, and particularly as part of Personal, Social, Health and Citizenship Education (PSHCE). Children are taught to recognise when they are at risk, how to report abuse and how to get help when they need it. Our pupils know that their concerns will be taken seriously and that they can safely express their views to any member of staff.

All staff are aware that abuse can take place wholly online. The Acceptable Use of IT Policy for Pupils contains clear guidance for pupils about the use of social media and the internet in general and should be read in conjunction with this policy.

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL or a Deputy DSL if they have any concerns about a child.

Safeguarding children means:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

The School will take all reasonable measures to:

- I.2.1 ensure that, in line with the School's published Staff Selection and Recruitment Policy, we practise safer recruitment in checking the suitability of staff, staff of contractors, supply staff and volunteers (including members of the Governing Body and staff employed by another organisation) to work with children and young people in accordance with: the guidance given in *KCSIE*; the Education (Independent School Standards) Regulations 2014 and the Statutory Framework for the Early Years Foundation Stage.
- I.2.2 ensure that in line with the School's Prevent Strategy and the protocols in the Staff Handbook, volunteers and visitors working with pupils on site are appropriately checked and supervised.
- I.2.3 ensure that where staff from another organisation are working with our pupils on another site, we have received assurances that appropriate child protection checks and procedures apply to those staff.
- I.2.4 follow the local inter-agency procedures of the Hillingdon Safeguarding Children Partnership to ensure that all staff and volunteers are aware of the need to refer any concerns immediately to the Designated Safeguarding Lead (DSL), or children's social care. Contact details for the DSL, her deputies and children's social care are listed in Appendix I of this Policy.
- I.2.5 protect each pupil from any form of abuse, whether from an adult or another pupil, regardless of gender, ethnicity, disability, sexuality or belief. Abuse is a form of maltreatment of a child. See Appendix 3.

- 1.2.6 identify children who may be in need of extra help or who are suffering, or are likely to suffer significant harm, abuse or neglect in the School and from outside; referring these concerns to the DSL if necessary, otherwise to relevant pastoral staff, and taking appropriate action; working with others, including services outside the School, including use of Common Assessment Framework (CAF), Team around the Child (TAC) and Multi Agency Safeguarding Hub (MASH) to support the child.
- 1.2.7 deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with any agreed child protection plan, taking into account the wishes of the child.
- 1.2.8 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
- 1.2.9 be alert to the medical needs of children with medical conditions and provide appropriate support. The School will work with medical professionals as necessary to support pupils as best as it is able.
- 1.2.10 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse.
- 1.2.11 teach pupils about safeguarding, including how to keep themselves safe on-line and to recognise when they are at risk and how to get help when they need it, through the use of on-line resources, the curriculum and PSHCE. More detailed information is available in the PSHCE and Relationships, Sex and Health Education (RSHE) Policies and the Acceptable Use of IT Policy for Pupils.
- 1.2.12 take all practicable steps to ensure that the School premises are as secure as circumstances permit.
- 1.2.13 monitor attendance regularly, refer any concerns to the authorities as necessary, report monthly to the local authority.
- 1.2.14 have regard to guidance issued by the Secretary of State for Education (DfE) in accordance with Section 157 of the Education Act 2002 and associated regulations.
- 1.2.15 identify pupils at risk of radicalisation and extremism.
- 1.2.16 provide a safe space in which young people can understand and discuss sensibly topics including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge these ideas.
- 1.2.17 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in our local area and pay particular attention to the Safeguarding questions raised by the increased use of technology in teaching, learning and administration. The School's Staff IT Acceptable Use Policy is detailed in the Employment Manual.

- I.2.18 ensure that where necessary an appropriately trained and informed person is appointed to promote the educational achievement of any child who is a 'looked after child' (LAC). The Designated Safeguarding Lead should have details of the child's Social Worker as well as details about the child's care arrangements and the levels of authority looking after them. (See Appendix 3 for more information regarding LAC).
 - I.2.19 the School assesses the risks and issues in the wider community when considering the wellbeing and safety of its pupils.
- I.3 *Keeping Children Safe in Education* requires that the inspection of independent schools will ensure that the Independent School Standard which concerns the welfare, health and safety of children, is met.
- I.4 This policy is supported by Appendices I- II as follows:
 - I.4.1 Appendix 1 – Key Contacts;
 - I.4.2 Appendix 2 - Role of the Designated Safeguarding Lead;
 - I.4.3 Appendix 3 - Types and signs of abuse;
 - I.4.4 Appendix 4 - Specific Safeguarding Issues;
 - I.4.5 Appendix 5 - Online Safety;
 - I.4.6 Appendix 6 - What staff should do if they suspect or hear a complaint of abuse, or have other concerns about a child;
 - I.4.7 Appendix 7 - Flowchart of action where there are concerns about a child;
 - I.4.8 Appendix 8 - Dealing with allegations and concerns about teachers, including supply teachers, other staff, volunteers, contractors and governors;
 - I.4.9 Appendix 9 - Photographs and Videos (including in the EYFS);
 - I.4.10 Appendix 10 - Forms for Recording Low-Level Concerns;
 - I.4.11 Appendix 11 – St Helen's Enterprises Limited
- I.5 Further guidance on safeguarding arrangements where children are engaged in close one-to-one teaching is contained within the Staff Code of Conduct.
- I.6 Further guidance on staff/pupil relationships and communications, including use of social media, is contained within the Acceptable Use of IT Policy for Pupils, and the following policies that are contained within the Employment Manual: Staff IT Acceptable Use Policy, Staff Social Media Policy and the Staff Code of Conduct.

2. The Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs)

- 2.1 The School has appointed a member of the School's senior leadership team (SLT) to undertake the role of the Designated Safeguarding Lead (DSL) and other members of the SLT to be Deputy Designated Safeguarding Leads (DDSLs); together, they are responsible for matters relating to child protection and welfare. The contact details for these members of staff are at the front of this Policy.
- 2.2 The DSL and DDSLs are 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 inter-agency meetings and to contribute to the assessment of children.
- 2.3 Parents are welcome to approach the DSL or a DDSL 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 Headmistress who will notify the DSL in accordance with these procedures.
- 2.4 All DSLs and DDSLs have undertaken Level 3 Child Protection training and training in inter-agency working and attend refresher training at regular intervals. The Headmistress is also trained to the same level.
- 2.5 If, at any point, there is a risk of immediate harm to a child, a referral should be made to children's social care immediately. Anyone may make a referral. Anyone can offer Early Help Intervention. Contact details are at the front of this document.

3. Duty of employees, governors and volunteers

- 3.1 Every employee and governor of the School as well as every volunteer who assists the School is under a general legal duty:
 - 3.1.1 to protect children from abuse;
 - 3.1.2 to be aware of the School's child protection and safeguarding procedures and to follow them;
 - 3.1.3 to know how to access and implement the School's child protection procedures, independently if necessary;
 - 3.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this policy;
 - 3.1.5 to report any matters of concern immediately to the DSL, and
 - 3.1.6 to make an immediate referral to children's social care if there is a risk of immediate serious harm to a child.
 - 3.1.7 to make an immediate report to the police if they discover that FGM appears to have been carried out on a girl under 18.
- 3.2 **Providing Early Help:** All staff should, in particular, be alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

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

3.3 Children with special educational needs and disabilities:

Staff are aware that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges both online and offline. They are aware of all pupils in school with SEND and know that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- adults making assumptions that indicators of possible abuse such as behaviour, mood and injury are related to the child's condition, without further exploration;
- these children being more prone to peer group isolation or bullying than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges; and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content

3.4 Children absent from education and children missing education:

All staff are aware that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

The DSL ensures that all children have at least two emergency contacts where this is reasonably possible. Attendance and absence are closely monitored. The DSL, with assistance from the Assistant Head Pastoral, Director of Pastoral Care, Head of Prep and Attendance Officer, monitor unauthorised absence and take appropriate action, including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff are alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. These procedures help prevent the risk of pupils becoming children missing education.

3.5 Children in Need:

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

In situations where a child has not suffered significant harm and is not at risk of suffering significant harm, but risk factors are present, or the child is in need of support from one or more agencies, the Designated Safeguarding Lead (DSL) should be consulted and a course of action agreed. The DSL will advise on early help and preventative work that can be done within school. An agreed member of staff will talk to the child's parents/carers, sharing the School's concern about the child's vulnerability and discussing how the family and School can work together to reduce the risk.

Each case of a Child in Need is kept under review and an initial action plan for early help does not prevent a further referral to children's services if the child's situation does not improve.

3.6 Children who are Lesbian, Gay, Bi or Trans (LGBT)

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

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. Full support is available from staff in cases of homophobic, biphobic and transphobic bullying and abuse.

3.7 Governors:

The Governors ensure that the School's safeguarding arrangements take into account the procedures and practice of the Hillingdon Safeguarding Children Partnership. The Governing Body has nominated one of its members as the Safeguarding Governor who is responsible for liaising with the DSL regarding all child protection issues.

The role is strategic rather than operational. The Safeguarding Governor can be contacted care of 01923 843220.

4 Training

- 4.1 All new staff, including temporary staff and volunteers, are provided with Level 1 annual induction training that includes:
 - 4.1.1 this policy (which includes the policy and procedures to deal with child-on-child abuse);
 - 4.1.2 sections from the School Employment Manual, including the Staff Code of Conduct, Staff IT Acceptable Use Policy, Staff Social Media Policy, Whistleblowing Policy, Pupil Behaviour Policy, Anti-bullying Policy and Missing Child Policy;
 - 4.1.3 the role, identity and contact details of the DSL and her Deputies;
 - 4.1.4 online safety (including an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring);
 - 4.1.5 the most recent version of Part 1 of *Keeping Children Safe in Education* and Annex B for all school leaders and those staff who work directly with children, or, Annex A only for those staff who do not work directly with children and where the DSL judges this to be appropriate.
- 4.2 Additional advice on handling disclosures is contained within the Staff Handbook.
- 4.3 All staff, including the Headmistress, receive a copy of this policy annually after it has been updated together with the relevant section(s) of KCSIE (as noted in 4.1.5), and are required to confirm that they have read and understood these. The Headmistress, all staff members and the nominated Governor undertake regular and appropriate child protection training which will be updated regularly in accordance with the London Safeguarding Children Partnership guidance. This training includes Prevent awareness and online safety, and is supplemented as required and at least annually, with updates via email, staff bulletins and briefings. All staff working directly with children also undertake a further online safety training course.
- 4.4 The Headmistress and senior members of staff undertake Safer Recruitment Training every three years and are updated by the HR Manager annually of any changes; this is aimed at preventing people who pose a risk of harm from working with children at St Helen's School.
- 4.5 All Governors receive appropriate safeguarding training at induction, and this is updated annually.

5 Procedures

Complaints of abuse

- 5.1 Every complaint or suspicion of abuse, sexual violence or sexual harassment from within or outside the School is taken seriously and action is taken in accordance with this policy. All staff reassure victims that they are being taken seriously and that they will be supported and kept safe.

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

- 5.2 The child protection and safeguarding training provided to staff considers the types and signs of abuse staff should be aware of and reminds staff of the action they should take if they are concerned about a child. Further details are set out in Appendix 2.

6 Child at Risk - Action by the Designated Safeguarding Lead

If a member of staff is concerned that a pupil may be suffering harm or is likely to suffer harm, the matter should be referred to the DSL (or a Deputy DSL) as soon as possible. If at any point there is a risk of significant harm a referral should be made to children's social care immediately.

- 6.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the DSL will take into account:
- 6.1.1 the local inter-agency procedures of the London Safeguarding Children Partnership;
 - 6.1.2 the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care and the police;
 - 6.1.3 **the child's wishes** or feelings; and
 - 6.1.4 duties of confidentiality, as far as applicable.
- 6.2 If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care. 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 (and in any event within 24 hours). Receipt of referral should be received within one working day.
- 6.3 If the initial referral is made by telephone, the DSL will confirm the referral in writing to children's social care within 24 hours. If no response or acknowledgement is received within two working days, the DSL will contact children's social care again.
- 6.4 The DSL will inform the Headmistress and the Safeguarding Governor of all referrals as soon as practically possible.
- 6.5 See Appendix 6 for details about the steps that member of staff should take if they have safeguarding concerns about a child.

7 Dealing with allegations against / concerns raised about teachers, supply teachers, other staff, volunteers, and contractors

- 7.1 The School has procedures for dealing with allegations against and concerns about staff (including supply staff), volunteers and contractors 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 8 and follow Part 4 of *Keeping Children Safe in Education*.

7.2 The Local Authority Designated Officer(s) will be informed within one working day of all allegations against staff and volunteers that come to the School's attention and appear to meet the harm threshold. See Appendix 8 for further details.

7.3 Early Years Foundation Stage:

The DSL for the EYFS is Rachael Marriott.

The School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on School premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

7.3.1 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

7.4 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 is contained in the Employment Manual and the teaching staff Handbook.

7.5 Whistleblowing:

We hope that staff feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime in relation to children with the DSL, or the Headmistress. All concerns will be taken seriously. Staff should consult the separate School Whistleblowing Policy. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other channels are open to them as follows:

- General guidance can be found at <https://www.gov.uk/whistleblowing>.
- Staff can call the NSPCC Whistleblowing helpline on 0800 028 0285 from 8.00am to 8.00pm, Monday to Friday, or email help@nspcc.org.uk.

8 Allegations against pupils including allegations of child-on-child abuse

8.1 Any allegation of bullying, including cyber-bullying and bullying outside School, will be dealt with according to the School's Anti-bullying Policy.

8.2 Where an incidence of bullying is suspected/reported, the advice of the Phase Leader/ Head of Year, or Prep Assistant Head/Assistant Head Pastoral/Director of Sixth Form, should be sought immediately. The Deputy Head Pastoral must be kept informed and consulted about possible sanctions and support.

8.3 Where there is reasonable concern that a child may be suffering or likely to suffer significant harm as a result of child-on-child abuse, this will be brought to the attention of children's social care. See Appendix 4 for further details about child-on-child abuse.

8.4 A pupil against whom an allegation of child-on-child abuse has been made may be suspended from the School during the investigation and the School's Pupil Behaviour Policy will apply.

- 8.5 The School will take advice from children's social care as necessary 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.
- 8.6 If it is necessary for a pupil to be interviewed by the police in relation to allegations of child-on-child 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 accordance with PACE Code C 2019).

9 Informing parents

- 9.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Headmistress, the Local Authority Designated Officer(s) (LADO), children's social care and / or the police without informing parents.
- 9.2 See also Appendix 8 for details about the disclosure of information where an allegation has been made against a member of staff or volunteer at the School.

10 Missing child procedures

- 10.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting any pupil missing from School. See the School's separate Missing Child Policy for further details.

11 Secure school premises and visitors

- 11.1 The School takes all practicable steps to ensure that School premises are as secure as circumstances permit.
- 11.2 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. All visitors are asked to read a summary of our safeguarding procedures as they sign in at Reception. This identifies the DSL and invites them to request a meeting with the DSL if they have any concerns about the welfare of a pupil during their visit.
- 11.3 The School has a clear Visitor and Visiting Speaker Policy. The use of appropriate visiting speakers to enrich the experiences of pupils and staff, and to stimulate debate is encouraged. However, staff must ensure that visiting speakers are appropriately vetted and supervised in accordance with the Visitor and Visiting Speaker Policy.

Any messages communicated to pupils by visiting speakers must be consistent with the ethos of the school and the Fundamental British Values, and must not marginalise any communities, groups or individuals, or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.

The organiser will obtain such formal and informal background information about the speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School and complete the online Visiting Speaker Risk Assessment available on the staff portal.

Authorisation for the visit must be received from the Head of Prep or Deputy Head Pastoral before bookings are confirmed.

Through this procedure, the School will have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE Annex B.

- 11.3 Please see Appendix 9 of this Policy, Staff Code of Conduct, Staff IT Acceptable Use Policy and Staff Social Media Policy in the Employment Manual for details of the School's policy on the use of cameras and mobile phones, including in the EYFS setting.
- 11.6 Full written risk assessments are carried out for all volunteers, and professional judgement and experience are used when deciding what checks, if any, are required. Volunteers on whom no checks have been obtained are never left unsupervised or allowed to work in regulated activity.

12 Records, confidentiality, and information sharing

- 12.1 **All** concerns, discussions, decisions made, together with the reasoning for those decisions, actions taken, and outcomes are recorded, either in writing or in our secure electronic recording system 'CPOMS'. A separate file is kept for each child.
- 12.2 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 co-operate with police and children's social care 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 (December 2020).
- 12.3 Where allegations have been made against staff, the School will consult with the Local Authority Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 12.4 Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:
 - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
 - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and where the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or, if to gain consent would place a child at risk.
 - not providing pupils' personal data where the 'serious harm test' (explained [here](#) on the Disclosure and Barring Service website) under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

13 Disqualification under the Childcare Act 2006

- 13.1 This relates to staff and other people working in the Early Years and those involved in childcare for children **under the age of eight in before- and after-school settings**. Schools must not knowingly employ people to work in childcare or allow them to be directly concerned in its management if they themselves are directly 'disqualified' from childcare.

Schools must either check whether people are disqualified or ensure others have done so (eg their own employer or training provider). The grounds for disqualification can be found in *KCSIE*. Further details are in our Recruitment, Selection and Disclosure Policy.

14 Monitoring and governance

- 14.1 After any serious child protection incidents at the School, consideration will be given to a review of the safeguarding procedures and a report made to the Governors if appropriate. Where a child protection incident involves a member of staff, the Local Authority Designated Officer(s) (LADO) will assist in this review to determine whether any improvements can be made to the School's procedures.
- 14.2 The Safeguarding Governor carries out a termly audit of child protection records and low-level concern records.
- 14.3 The Safeguarding Governor oversees the annual review of filtering and monitoring provision.
- 14.4 The DSL holds a meeting at least once per half term with the Safeguarding Governor to review safeguarding procedures and implementation.
- 14.5 The DSL and Safeguarding Governor will ensure that any deficiencies or weaknesses in regard to child protection arrangements, policies or procedures at any time are remedied without delay.
- 14.6 The full Board of Governors undertakes an annual review of this policy and its procedures. They receive annually a report which details developments in safeguarding policy and procedures, training undertaken by staff, referral numbers, issues and themes that may have arisen and the contribution the School has made to multi-agency working in individual cases or local discussions on safeguarding matters.
- 14.7 The Governors receive child protection and safeguarding training at induction and annually thereafter; this is designed to give them the knowledge to provide strategic challenge to test that the policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding (including online safety) which is compliant with statutory guidance.

15 Remote Learning and Reporting a Concern in the Event of School Closure

- 15.1 In circumstances where teaching and learning are provided to pupils remotely (for example, due to enforced school closure or whilst pupils are self-isolating for Covid reasons), staff will communicate with pupils in accordance with the Remote Learning Protocol for Staff and Remote Learning Protocol for Students, through Microsoft Teams and school email accounts. Pupils and parents will be reminded of the Remote Learning Protocol for Students.
- 15.2 This Child Protection and Safeguarding Policy will continue to apply, and all staff will continue to be vigilant for any signs of safeguarding issues or concerns. Any additions to this Policy that are necessitated by the fact that teaching and learning is being provided remotely will be communicated to everybody as and when needed.
- 15.3 Where staff have a concern about a pupil during a period of enforced school closure they should continue to follow the process outlined in this Policy.

The DSL or her deputies will be available via email during school hours and can arrange a phone call to discuss matters arising. Staff should also record concerns in CPOMS, which can be done remotely without access to a networked school computer, by logging on to sthelensnorthwood.cpoms.net. Staff are reminded of the need to report any concern immediately and without delay.

Authorised by	Resolution of the Council of Governors
Effective date of the policy	1 st September 2023 – 31 st August 2024
Review period	Annual

Appendix I KEY CONTACT DETAILS

Internal Contacts

Designated Safeguarding Lead (DSL) and Senior Mental Health Lead	Neelam Varma (whole school)	Deputy Head Pastoral	Tel: 01923 843209 neelam.varma@sthelens.london
Deputy Designated Safeguarding Leads (DDSLs)	Paul Arnold (whole school)	Deputy Head Academic	Tel: 01923 843326 paul.arnold@sthelens.london
	Becky Workman (whole school)	Head of Prep	Tel: 01923 843312 becky.workman@sthelens.london
	Edward Walter (whole school)	Deputy Head Co-curricular, Operations and Partnerships	Tel: 01923 843288 edward.walter@sthelens.london
	Rachel Williams (whole school)	Assistant Head Sixth Form and Pupil Progress Y7-13	Tel: 01923 843238 rachel.williams@sthelens.london
	Rebecca Reidel-Fry (senior school)	Assistant Head Pastoral and Designated Teacher	Tel: 01923 843337 rebecca.reidel-fry@sthelens.london
	Hayley Stein (senior school)	Director of Sixth Form	Tel: 01923 843298 hayley.stein@sthelens.london
	Nicola Carzana (senior school)	Director of Pastoral Care	Tel: 01923 843322 nicola.carzana@sthelens.london
	Rebecca Whiteman (Prep school)	Deputy Head of Prep School	Tel: 01923 843296 rebecca.whiteman@sthelens.london
	Sudeep Gupta (Prep school)	Prep Assistant Head	Tel: 01923 843308 sudeep.gupta@sthelens.london
	Juliette Harvey (Prep School)	Pastoral Support Lead (Prep)	juliette.harvey@sthelens.london
EYFS Safeguarding Lead	Rachael Marriott (EYFS)	Phase Leader EYFS	Tel: 01923 843399 rachael.marriott@sthelens.london

Safeguarding Governor	Suzi Davis	Care of the Clerk to the Governors	Tel: 01923 843210 suzi.davis@sthelens.london
Chair of Governors	Philip Young	Care of the Clerk to the Governors	Tel: 01923 843210 philip.young@sthelens.london

External Contacts

If at any point, there is risk of immediate serious harm to a child, a referral will be made to the Local Authority where the child is resident immediately. Anyone can make a referral. The school may also contact the Local Authority for advice. It is not a requirement for parental consent for referrals to statutory agencies and this should be taken into consideration when parents may be involved in the abuse. The most common Local Authority contacts are listed here:

Local Authority	Telephone Number for Referral	Telephone Number for Advice
Hillingdon MASH	01895 556 006	
Hertfordshire MASH	0300 123 4043	01438 737511
Harrow MASH	0208 901 2690	
Buckinghamshire MASH	0845 460 0001 or 01296 383 962	
Brent	0208 937 4300	
Ealing	0208 825 8000	
Barnet	0208 359 4066	

Hillingdon Local Authority Designated Officer (LADO): Hannah Ives

- Telephone: 01895 250 975 or 07753 431 285
- Email: hives@hillingdon.gov.uk

Hillingdon Child Protection Adviser to Schools and Deputy LADO: Nicole Diamond

- Telephone: 01895 250 010 or 07943 097 366
- Email: ndiamond@hillingdon.gov.uk

LADO Address:
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Other useful telephone numbers for support and advice are given below:

<u>Organisation</u>	<u>Telephone Number</u>	<u>Email</u>
Childline	0800 1111	
NSPCC	0808 800 5000	
Ofsted's Whistleblower Hotline	0300 123 3155	
Local police (non-emergency)	101	
Hillingdon Local Authority Prevent Team	07946 714637	fgibbs@hillingdon.gov.uk (Fiona Gibbs) Referrals to: preventreferrals@met.pnn.police.uk
Extremism: DfE non-emergency helpline	0207 340 7264	counter-extremism@education.gsi.gov.uk
Hillingdon Participation Team (school attendance issues)	01895 250858	participationteam@hillingdon.gov.uk Childrenmissingeducation.gov.uk
Forced Marriage Unit	0207 008 0151	fmu@fco.gov.uk
FGM	0800 0283550 Police: 999	

Appendix 2

Role of the Designated Safeguarding Lead (DSL)

I **The main responsibilities of the Designated Safeguarding Lead (DSL) are set out below:**

1.6 **Manage referrals**

The DSL is expected to:

- Refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- Refer cases to the Channel* programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required. **NPCC - When to call the police** should help understand when to consider calling the police and what to expect when working with the police.

**The Channel programme is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into terrorism – see page 39*

1.2 **Work with others**

The DSL is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Headmistress to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations – this includes an awareness of the requirement for children to have an Appropriate Adult (in accordance with the PACE Code C 2019);
- as required, liaise with the “case manager” (as per Part 4 of KCSIE) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, and special educational needs coordinator (SENCO)), on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Headmistress and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Note that the DSL is also the School's Senior Mental Health Lead. The DSL is fully aware that safeguarding concerns may be linked to mental health.

1.3 **Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.

Where children leave the school or college (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare, and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to have support in place upon arrival of children who have had a social worker and been victims of abuse.

1.4 **Raising Awareness**

The DSL should:

- Ensure each member of staff has access to, and understands, the School's child protection and safeguarding policy and procedures, especially new and part-time staff;
- Ensure the School's child protection and safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;

- Ensure the child protection and safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the Hillingdon Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

1.5 Training, knowledge, and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children in social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

1.5 Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

1.6 Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings among all staff, and in any measures the school may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

1.7 Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

1.8 Availability

During term time, the DSL or a Deputy DSL is always available in person (during school hours) for staff and pupils to discuss any safeguarding concerns. For any out of hours/out of term activities arranged by the school for its pupils, the DSL or a Deputy DSL is on call and available by telephone.

During school holidays, there is a rota for a DSL or a Deputy DSL to check the school's secure electronic recording system 'CPOMS', and their own school emails, at least once daily. The person on the rota is also available to attend any Child Protection meetings arranged by Children's Services.

Staff are asked to contact the police during holidays if they have any reason to believe that a pupil might be at imminent risk of significant harm, and then to record full details on CPOMS.

If staff have concerns in the holidays about a pupil's welfare which does not suggest they are at imminent risk of significant harm, they are asked to put full details on CPOMS, which the DSL or deputy DSL allocated to check CPOMS during that period will read and follow up as appropriate.

Appendix 3

Types and Signs 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others e.g. in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, or in an institutional or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children. Children's poor behaviour and/or change of behaviour may be a sign that they are suffering harm or that they are traumatised by abuse.

Types of Abuse

Keeping Children Safe in Education (September 2023) defines the following types of abuse:

- **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.
- **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.
- **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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse can take place online and technology can be used to facilitate offline abuse.

The sexual abuse of children by other children is a specific safeguarding issue in education (also known as child-on-child abuse) and all staff should be aware of the School's procedures for dealing with it. See pages 31-34 for further detail.

- **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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- All staff are aware that **child sexual** and **child criminal exploitation** are forms of child abuse.

Signs of Abuse

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame, or confusion, particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children or young people needs to be vigilant to the signs listed below.

Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development. Children with learning difficulties, physical disabilities or health related issues may be at a different developmental stage to most of their peers. However, children who have experienced abuse or neglect from a young age may also display developmental delays compared to children their own age. In such cases, the lack of a clear medical explanation for these delays may be an indicator of abuse.

Below are some general warning indicators that may signal abuse:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;

- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Possible Signs of Physical abuse:

It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation. Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. Be vigilant to possible abuse if a child is frequently described as ill by their parent but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition.

Signs of physical abuse, as well as the more general indicators listed above, may include:

- Frequent injuries;
- Unexplained or unusual fractures or broken bones;
- Unexplained bruises or cuts, burns or scalds or bite marks;
- Improbable excuses or refusal to explain injuries;
- Wearing clothes to cover injuries, even in hot weather;
- Fear of medical help or examination.

Possible Signs of Emotional abuse:

It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another, and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child, such as those listed above and:

- Children who are excessively withdrawn, fearful or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child;
- Parents or carers who humiliate their child, for example by name-calling or making negative comparisons;
- Physical, mental and emotional development lags;
- Sudden speech disorders;
- Continual self-deprecation ('I'm stupid, ugly, worthless, etc');
- Overreaction to mistakes;
- Extreme fear of any new situation;

- Inappropriate response to pain ('I deserve this');
- Neurotic behaviour, unusual or excessive nervousness (obsessive, compulsive behaviours, rocking, hair twisting, self-mutilation);
- Self-harm; and/or
- Extremes of passivity or aggression.

Normal Sexual behaviour for adolescents:

It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Normal sexual behaviour for adolescents includes:

- Kisses, hugs, dates others, may have longer term relationships;
- Is interested in and asks questions about body parts, relationships and sexual behaviour. Is aware of the need for privacy;
- Uses sexual language and talks about sexual acts with peers;
- May look at sexual pictures including internet images;
- Masturbates in private; and/or
- Experiments sexually with adolescents of similar age.

Possible Signs of Sexual abuse:

Behaviours which might be concerning depend on the child's age and the situation. The following are possible indicators of sexual abuse in adolescents:

- Displaying knowledge or interest in sexual acts inappropriate to their age;
- Using sexual language or having sexual knowledge that you would not expect them to have;
- Asking others to behave sexually or play sexual games;
- Physical sexual health problems including soreness in the genital or anal areas, sexually transmitted infections or underage pregnancy;
- Regressing to younger behaviour patterns;
- Sudden loss of appetite or compulsive eating;
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder;
- Trying to be 'ultra-good' or perfect; overreacting to criticism;
- Self-harm.

Possible Signs of Neglect:

It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin. Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse.

However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected.

Possible signs of neglect include:

- Hunger, tiredness or poor personal hygiene;
- An indisputably dirty or unsafe home (e.g. around drugs, alcohol or violence);
- Poor state of clothing;
- Emaciation;
- Untreated medical problems;
- No social relationships;
- Compulsive scavenging;
- Destructive tendencies including anger, aggression or self-harm;
- Poor physical development e.g. delayed puberty.

Appendix 4

Specific Safeguarding Issues

All staff are aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, misuse of alcohol, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as youth produced sexual imagery) put children in danger.

All staff should be aware of the safeguarding issues listed below. Further information is to be found in Annex B of KCSIE.

Sharing Nudes and Semi-Nudes

The UK Council for Internet Safety (UKCIS) defines the sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

When dealing with cases involving the sharing of nudes and semi-nudes, we give due regard to the DfE guidance *Searching, Screening and Confiscation* and to the guidance document *Sharing nudes and semi-nudes: how to respond to an incident (UKCIS)*. All staff are aware that they should **never** view, copy, print, save or forward nude or semi-nude imagery. They should not ask the pupil to disclose any information regarding the imagery but should explain they need to report the matter to the DSL (or a deputy DSL) immediately and that the pupil will receive support and help from this colleague.

Child-on-Child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school, and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff understand that, even if there are no reports of child-on-child abuse in the school it does not mean it is not happening, it may be the case that it is just not being reported. Staff are clear about the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

If a member of staff has any reason to believe that child-on-child abuse may have occurred, they must speak to the DSL (or a deputy DSL) immediately. This includes cases where an adult discloses that they suffered child-on-child abuse when they were a child.

It is essential that all staff challenge inappropriate behaviours between peers, such as those listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between children (known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and / or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element especially around chat groups, and the sharing of abusive images and pornography).

The School's Pupil Behaviour Policy and Anti-bullying Policy make clear the expectations on pupils of acceptable behaviour towards other pupils and the actions that will be taken when behaviour falls short of expectations. When there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm, staff **must** report the child-on-child incident to the DSL. Such incidents are addressed as Child Protection concerns and the DSL will take advice from Local Authority Children's Social Care, in accordance with the flowchart of actions in Appendix 6. All children involved will be treated as being 'at risk'.

Staff must seek advice from the DSL if they are in any doubt about whether a child is suffering, or is likely to suffer, significant harm.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence

When referring to sexual violence in this policy, we do so in the context of child-on-child sexual violence and are referring to the following sexual offences:

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. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
 - sharing of unwanted explicit content

- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Sexual violence and sexual harassment can occur between two or more children of **any age and sex** from primary through to secondary stage and into college. They 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 and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. The School adopts a **zero-tolerance approach** to sexual violence and sexual harassment, regardless of where and when it has taken place.

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 reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows that girls and children with special educational needs and disabilities (SEND) are three times more likely to be abused than their peers.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be that it is just not being reported;
- making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are 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 physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If a member of staff has any reason to believe that a child may have suffered sexual violence or sexual harassment, they must speak to the DSL (or a deputy DSL) immediately. The DSL (or deputy DSL) will follow the guidance in Part Five of KCSIE 2023 about how to respond to the report. Staff must also speak to the DSL immediately if an adult discloses that they suffered sexual violence or sexual harassment when they were a child.

See Part Five of KCSIE 2023 for detailed advice about sexual harassment and sexual violence.

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

The DSL is the School's Senior Mental Health Lead; she and all other members of the Pastoral Committee are qualified youth mental health first aiders who can deal with any mental health issue and advise colleagues. If staff have a non-immediate mental health concern about a pupil, they should speak to the relevant Head of Year and record it in CPOMS. The Head of Year will then lead on an action plan and provide appropriate support.

For concerns about self-harm, staff should speak to the Head of Year, Assistant Head Pastoral (Senior School), Prep Assistant Head or the DSL, as soon as possible on the day that the matter came to their attention, and also record it in CPOMS.

Staff should contact the DSL or a Deputy DSL, without delay, if they think a child may be at risk of immediate harm.

Domestic Abuse

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

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home, which makes them victims in their own right, and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

If staff have a concern that a child may be witness to, or suffering from, domestic abuse, they should speak to the DSL or one of her Deputy DSLs immediately.

The School is part of Operation Encompass, which means that the Metropolitan Police Service notify the School's DSL, prior to the start of the next school day, when a child or young person living in one of their boroughs has experienced domestic abuse. The DSL has been trained in the Operation Encompass procedures as the Key Adult allowing us to then use the information that has been shared, in confidence, to support the child or children in our care.

Serious Violence

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

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Children who need a Social Worker

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

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children Absent from Education

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education 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 can also be a sign of child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse, or risk of forced marriage. 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.

The School has procedures for monitoring attendance and for managing children who go missing from education, particularly on repeat occasion. See the *Missing Child Policy*. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The School has admissions register, and an attendance register and all pupils are placed on both registers. The School informs the local authority of any pupil who is going to be deleted from the admission register where any of the grounds for deletion listed in *Children Missing Education* (September 2016) are met. This is done as soon as the grounds for deletion are met, and no later than deleting the pupil's name from the register.

The School is required to inform the local authority via a monthly return of any pupil whose attendance falls below 90%, who has been absent for 10 or more consecutive school days or has been removed from roll. Children admitted to the School roll outside standard transition points must also be reported and Looked After Children specifically identified.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

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

Some of the following can be indicators of both CCE and CSE where children:

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

Some additional specific indicators that may be present in CSE are children who:

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

More information is included in Annex B of KCSIE.

County Lines

County lines is a form of CCE. It is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

So-called 'honour based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA encompasses crimes which have been committed to protect/defend the honour of the family/community and include, FGM, forced marriage, and practices such as breast ironing.

Female Genital Mutilation (FGM) and Mandatory Reporting Duty

FGM 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.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals, to personally 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 may face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's DSL and involve children's social care as appropriate.

There are a number of factors that might indicate that a girl is at risk of FGM or that it is imminent. Signs that female genital mutilation may already have taken place include:

- Difficulty walking, sitting or standing or talking about pain or discomfort between her legs (she may even look uncomfortable).
- Spending longer than normal in the bathroom or toilet, or away from the classroom during the day, with bladder or menstrual problems.

- Prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on return from being away.
- Reluctance to undergo normal medical examinations or change for PE.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

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, threat or any other form of coercion is used. Threats can be physical, emotional, or psychological.

In addition, since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's or college's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, the possible indicators listed below should be taken into consideration alongside other factors and contexts. These possible indicators are not a cause for concern on their own.

Outward appearance

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with children who are different
- Becoming abusive to children who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups

Online behaviour

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or deputy) making a Prevent referral.

The DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent Duty

Since 1 July 2015, Schools have been subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

All staff undertake a Prevent Duty training course (provided by the Home Office) which gives them a general understanding of the risks affecting children and young people, and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. All concerns are reported to the DSL. The DSL and deputies are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

The School has internet filters in place which aim to ensure that children are safe from terrorist and extremist material when accessing the internet in school. The School monitors pupil use of the internet and teaches pupils about online safety more generally – see Appendix 4 for further detail.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the School may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a close relative* in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. The School will notify the Local Authority to allow them to check the arrangement is suitable and safe for the child.

(*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great-grandparents or cousins.)

Looked After Children (LAC) and Previously Looked After Children

A child who is looked after by a local authority is referred to as a 'looked after child' (LAC) as defined in section 22 Children Act 1989; this means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. The most common reason for children becoming looked after is as a result of abuse and / or neglect. All staff are aware that looked after children and previously looked after children are a particularly vulnerable group.

The Headmistress has appointed a designated teacher who will work with local authorities to promote the educational achievement and wellbeing of all registered pupils who are looked after. The designated teacher is suitably trained and supported, has the relevant qualifications and experience, and has access to all relevant information about the care arrangements and support structure for each looked after student.

The designated teacher will work with the virtual school head* to discuss how funding can best be used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked after children.

The DSL has details of the social workers allocated to looked after children and the names of virtual school heads in the authorities who look after these children. The DSL and designated teacher ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status and the child's contact arrangements with birth parents or those with parental responsibility.

In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker.

**the virtual school head is in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and for managing the pupil premium funding for these children*

Appendix 5

Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. All staff are aware that abuse can take place wholly online, and they understand that the use of technology is a significant component of many safeguarding issues e.g. in incidents of child sexual exploitation, radicalisation, and sexual predation.

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and financial scams.

We have a whole school approach to online safety, doing all we can to minimise the risk of exposure to harmful material through the School's IT system. This includes appropriate filtering and monitoring systems (e.g. Smoothwall) which are reviewed at least annually and meet the **DfE's filtering and monitoring standards**, and a clear Acceptable Use of IT Policy for Pupils (AUP) which should be read in conjunction with this policy. The AUP includes the clear expectation that pupils up to and including those in Year 11 must have personal mobile phones switched off during school hours and sanctions for violation of this rule are outlined in the Pupil Behaviour Policy. Other expectations pertaining to the management of pupil access to the internet via other personal internet-capable devices, as well as via the Pupil Learning Devices are outlined in the AUP. The content of the AUP is highlighted to all pupils and parents at least annually.

Online safety training for staff and pupils is an integral part of our overarching approach to safeguarding. It is encompassed within the annual safeguarding training that all staff complete; all staff understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring, including how to escalate concerns once identified. Those staff who work directly with children also undertake a more detailed training course in online safety.

Much of the education of pupils regarding online safety is delivered through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) as well as Health Education - these are core components of our PSHCE programme.

The Designated Safeguarding Lead (DSL) has lead responsibility for online safety and for understanding the filtering and monitoring systems and processes in place.

The DSL is supported in this by the following colleagues who work together to ensure that the DfE's filtering and monitoring standards are met and have key roles and responsibilities as outlined below:

- Director of IT – responsible for ensuring and maintaining a safe technical infrastructure at the School, the security of our hardware system, that use of the school Wi-Fi is monitored on all IT devices in School, and keeping abreast of the rapid succession of technical developments;
- Assistant Head Pastoral – Deputy DSL with delegated responsibility for online safety including line management of the 'Smoothwall' Alerts Coordinator and the education of pupils on this topic; has completed 'CEOP Ambassador' training;
- Director of Digital Learning – responsible for training teaching staff in the use of technology, including software for actively monitoring pupil use of learning devices in lessons, updating the Pupil AUP (with the DSL) and ensuring that every student has read and agreed to keep to the terms of the AUP;
- 'Smoothwall' Alerts Coordinator – responsible for monitoring alerts produced by the filtering system and following up as appropriate in liaison with the Assistant Head Pastoral; has DSL training;
- The Safeguarding Governor - responsibility for overseeing online safety, including oversight of the annual review of filtering and monitoring;
- Assistant Head of Prep School – lead responsibility in Prep School for educating pupils and Prep parents on topics related to online safety; works with the Smoothwall Alerts Coordinator to follow-up on Smoothwall alerts relating to Prep School pupils; works with the Assistant Head Pastoral to create a whole-school approach to online safety education;
- Director of Sixth Form – lead responsibility for educating Sixth Form students on topics related to online safety; works with the Assistant Head Pastoral to create a whole-school approach to online safety education.

We keep our parents up to date regarding online safety by providing reputable resources and information and discussing the matter at relevant parent information evenings. For information regarding remote teaching and learning, see page 17.

Appendix 6

What staff should do if they suspect or hear a complaint of abuse, or have other concerns about a child

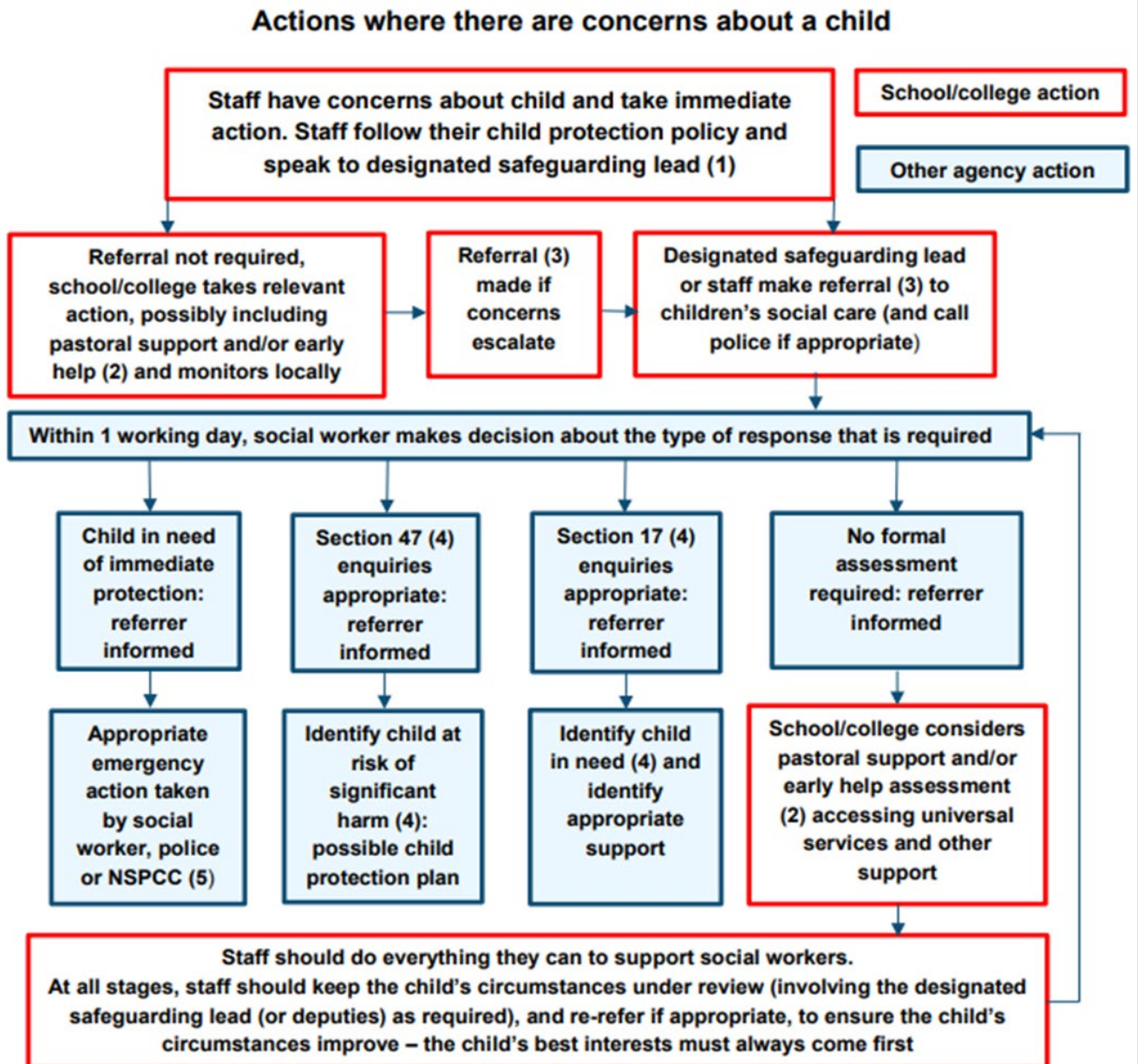
I. Action staff must take

A member of staff suspecting or hearing a complaint of abuse:

- I.1 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
- I.2 must not ask leading questions, i.e. a question which suggests its own answer
- I.3 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 DSL (or a Deputy DSL) who will ensure that the correct action is taken
- I.4 must keep a sufficient written record of the conversation. The record should include:
 - (a) the date and time
 - (b) the place of the conversation and
 - (c) the words used by the child; do not add any opinion or interpretations.
- I.5 The record should be signed by the person making it and should use names, not initials. The record should also use roles, such as Head of Year, where appropriate. The record must be kept securely and handed to the DSL as soon as possible.
- I.6 All evidence, for example, scribbled notes, mobile phones containing text messages, clothing or computers, must be safeguarded and preserved and passed to the DSL.
- I.7 All suspicions or complaints of abuse must be reported to the DSL (or a Deputy DSL) immediately, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 7 should be followed. If there is a risk of immediate serious harm to a child and it is not possible to report to the DSL or Deputy DSL, a referral should be made to children's social care immediately.
- I.8 See Appendix 7 for a flowchart which sets out the process for staff.

Appendix 7

Flowchart of action where there are concerns about a child (from Keeping Children Safe in Education (2022) – Part 1)



Appendix 8

Dealing with allegations and concerns about teachers, including supply teachers, other staff, volunteers, contractors, and governors

Reporting a safeguarding concern or allegation from an adult relating to childhood

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation that they were abused as a child, they should be advised to report the allegation to the police. The disclosure should be shared immediately with the DSL who will report it to the Local Authority Designated Officer(s) (LADO). The LADO will coordinate with children's social care and the police as appropriate.

Reporting a safeguarding concern or allegation against staff who no longer work at the school

Allegations against a member of staff, supply staff, volunteer or contractor who is no longer working in the school should be shared immediately with the DSL. The DSL will refer to the LADO who will advise of next steps.

Reporting a safeguarding concern or allegation about a governor of the school

- Any allegation against a Governor other than the Chair of Governors should be reported within one working day to the Chair of Governors;
- Any allegation against the Chair of Governors must be reported within one working day to the LADO.

Reporting a safeguarding concern or allegation about another staff member, including supply staff, volunteer, or contractor currently working at the school which MAY meet the harm threshold

Harm Threshold

The **harm threshold** is met where the member of staff, supply teacher, volunteer or contractor has:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against, or related to, a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour that may have happened in their personal life, outside of school premises/hours, and is called **transferable risk**.

Transferable risk

Examples of matters that may constitute transferable risk are if the individual:

- has been arrested for a violent offence on an adult or for the possession of a weapon;
- has, as a parent or carer, become subject to child protection procedures;
- is closely associated with someone in their personal life (such as partner, household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering;
- has been involved in domestic violence at home (even if no children were involved);
- has been involved in misuse of alcohol or substances;
- has made inappropriate comments about children to colleague(s);
- has made comments in a personal social media conversation or verbally that are homophobic, racist or not in keeping with British Values.

The referring member of staff does not need to decide whether a concern meets the harm threshold; if they think that it *might* be met, then their duty is to refer the matter, including full details, as set out below:

How to report an allegation

- The matter should be reported **immediately to the Headmistress**, and, if possible, in person; in her absence, the report should be made to the DSL unless the concern involves the DSL, in which case the report should be made to the Chair of Governors (contact details on page 3 of this policy);
- Where the concern / allegation is about the Headmistress, the matter should be reported immediately to the Chair of Governors, or in their absence the Safeguarding Governor, without first notifying the Headmistress.

The person leading any investigation is known as the "case manager"; this will be the Headmistress or a senior colleague chosen by her, unless the allegation is about the Headmistress, in which case it will be the Chair of Governors.

The initial response to an allegation

Where the School identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.

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

- Looking after the welfare of the child - the Designated Safeguarding Lead (or a Deputy DSL) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The School applies common sense and judgement, deals with allegations as quickly, fairly and consistently as possible and provides effective protection for the child and support for the person subject to the allegation.

Contacting the Hillingdon LADO

- When the DSL / Headmistress / Chair of Governors believes that the harm threshold is met a referral should be made to the LADO within one working day.
- When the DSL / Headmistress / Chair of Governors is unsure if the harm threshold is met or if this is a low-level concern, they should contact the LADO withing one working day to seek advice.
- When the DSL / Headmistress / Chair of Governors does not initially feel the harm threshold is met but plans to conduct further enquiries, these should be conducted as soon as reasonably possible in line with the perceived risk. If at any point whilst conducting further enquiries the harm threshold is then considered to be met or possibly be met, the LADO should be contacted within one working day from that point.
- Where the DSL / Headmistress / Chair of Governors is confident the harm threshold is not met then this does not need to be referred to the LADO.

Before contacting the LADO, the School should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, the School should consider whether the individual was in the School at the time of the allegations, whether they did or could have come into contact with the child, whether there are any witnesses and whether there is any CCTV footage.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account [this DfE Policy](#) which states that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

No further action

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

Further enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's or college's staff. Where there is a lack of appropriate resource, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator.

The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

Supply teachers and all contracted staff

In some circumstances, schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business.

We ensure all such allegations are dealt with properly. Under no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care.

The school will usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are taken into account by the school during the investigation.

When using a supply agency, schools should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Organisations or Individuals using school premises

The school may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). Such activities are arranged through St Helen's Enterprises Limited (STHNEL) which is a company owned by the School. STHNEL has its own Designated Safeguarding Lead who is employed by the School, and who leads on all child protection and safeguarding matters related to STHNEL activities, including informing the LADO where an allegation relating to an adult arises – see Appendix 11 for further details.

Governors

Where an allegation against a Governor is substantiated, the school will follow procedures to consider removing them from office.

Suspension

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and children's social care where they have been involved.

Where a school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at a school or sixth form college, they should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the investigation by the Teaching Regulation Agency (TRA), the individual must not carry out teaching work.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the school or college, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

Based on advice from the school or college's HR provider and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension. This will, however, depend upon the nature of the allegation.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support.

The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views.

Duty of care

The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers should:

- manage and minimise the stress caused by the allegation;
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- advise the individual to contact their trade union representative, or a colleague for support;
- appoint a named representative to keep the person informed about progress of the case;
- provide access to counselling or medical advice where appropriate; and
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

Confidentiality and Information sharing

In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the school should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

The school must make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- the point that the accused person is charged with a relevant offence; or
- the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

Allegation outcomes

The definitions that should be used when determining the outcome of an allegation are set out below:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,

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

The options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position; an individual should be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services,

the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Following a criminal investigation or a prosecution

The police should inform the LADO and the employer immediately when:

- a criminal investigation and any subsequent trial is complete;
- it is decided to close an investigation without charge; or,
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmistress will consider whether to take disciplinary action in accordance with the School's Pupil Behaviour Policy.

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

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

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

Resignations and 'settlement agreements'

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school or college investigation where that is appropriate.

Schools should not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate.

It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools and colleges sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, schools and colleges should not let it prevent the employer from:

- fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Non-compliance of this duty is a criminal offence; or
- providing a reference to potential employers when requested; or
- considering whether to make a referral to the Teaching Regulation Agency (TRA) where the criteria are met.

Record keeping

Details of allegations found to have been false or malicious will be removed from personnel records.

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, unfounded or malicious will not be referred to in employer references.

Reporting a safeguarding concern or allegation about another staff member (including supply staff), volunteer, or contractor currently working at the school which DOES NOT meet the harm threshold i.e. reporting a Low-Level Concern

Concerns which do not meet the harm threshold (set out on page 46) are low-level concerns. These 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 school; or as a result of vetting checks undertaken.

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers, and contractors) are shared responsibly and with the right person, and dealt with promptly and appropriately. This is an important element of training given during new staff induction.

Our aim is to ensure that the expected behaviour set out in the staff code of conduct are constantly lived, monitored, and reinforced by all staff. Such an ethos enables us 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 are clear about professional boundaries and act within these boundaries.

Low-level concerns

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold set out in the previous section. 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 harm 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, humiliating children.

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.

Staff code of conduct

Our Staff Code of Conduct sets out our expectations of behaviour of staff. We ask all staff to share any low-level safeguarding concerns, including self-referrals, and we provide a responsive, sensitive, and proportionate handling of such concerns when they are raised.

We support individuals to correct any inappropriate behaviour at an early stage and reflect on whether there is any weakness in the safeguarding system.

All staff are encouraged 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 may fall below the expected professional standards.

Sharing Low-Level Concerns

A '**Sharing a Low-Level Concern**' Form (see Appendix 10) must be completed by any member of staff who has a low-level concern about themselves or about another member of staff. They should share the completed form with the relevant colleague as explained below and endeavour to talk to them in person as well.

- **All low-level concerns that are not about the Headmistress or the DSL should be shared with the DSL** using the Microsoft Form** on the staff portal. If the member of staff feels unable to share with the DSL, they should share the concern with the Headmistress instead.
- For low-level concerns that are **about the Headmistress**, the Word version** of the Form should be completed and **emailed to the Chair of Governors**, or in their absence, the Safeguarding Governor.
- For low-level concerns that are **about the DSL**, the Word version** of the Form should be completed and **emailed to the Headmistress**.

**Three formats of the 'Sharing a Low-Level Concern' Form (all requiring the same information) are available as follows:

- i. **Microsoft Form** on the staff portal – gives you the option to save the details and goes to the DSL once 'submit' is clicked;
- ii. **Word version** on the staff portal - save into your own OneDrive, complete and email to the relevant person as set out above;
- iii. **Hard copy** at Reception in Senior School, Woolfson and Sports Centre - for use where access to digital formats is not straightforward.

Staff DO NOT need to be able to determine in each case whether their concern is a low-level concern, or serious enough to meet the harm threshold (set out on page 46). Once staff share what they believe to be a low-level concern by submitting the 'Sharing a Low-Level Concern' Form, that determination will be made by the DSL, Headmistress or Chair of Governors as appropriate. However, if a member of staff is unsure about whether there are grounds for concern, they can discuss this first with the DSL or the Headmistress, as appropriate.

Responding to low-level concerns and recording actions taken

- The DSL will inform the Headmistress of all the low-level concerns received and in a timely fashion according to the nature of each particular concern.
- The School will share reports about supply staff and contractors with their employers so that any potential patterns of inappropriate behaviour can be identified.
- If the individual sharing their concern wishes to remain anonymous on the written record, then that will be respected as far as reasonably possible.
- The DSL or another Deputy nominated by the Headmistress will collect as much evidence as possible by speaking directly to the person who raised the concern (unless it has been raised anonymously) and to the individual involved and any witnesses.
- The information collected will be shared with the Headmistress and will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this information will be recorded along with the rationale for the decisions and action taken on an 'Actions Taken Following the Sharing of a Low-Level Concern' form (see Appendix 10) and the record kept under review. For all low-level concerns which are not about the Headmistress, she is the ultimate decision maker. However, she may wish to consult the DSL and take a more collaborative decision-making approach.
- Some low-level concerns will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of guidance and/or training.
- In many cases, a conversation with the individual about whom the concern has been raised will be all that is needed. Any such conversation should clarify to the individual why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- If a low-level concern raises issues of misconduct or poor performance the Headmistress in conjunction with the Head of HR may determine that the School's Disciplinary Procedure is triggered; in this case, the School must ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.
- All 'Sharing a Low-Level Concern' Forms and 'Actions Taken' Forms will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

- Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or, where the pattern of behaviour suggests the harm threshold has been met, it will be referred to the LADO. If there is any doubt as to whether the harm threshold has been met, then the LADO will be consulted.
- Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and, where appropriate, policies will be revised, or extra training delivered, to minimise the risk of it happening again.
- Such information is retained at least until the individual leaves their employment.

References

The school will only provide substantiated safeguarding allegations in references. Low-level concerns will 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.

Appendix 9

Photographs and Videos (including in the EYFS)

Staff Personal Mobile Devices: Staff may not take any images of children using personal mobile devices. Staff must ensure they switch off personal mobile devices and keep them out of sight and out of pupils' reach during pupil contact time.

General Permission: Teaching staff and marketing staff may obtain and use photographs and images (including video recordings) of pupils for educational purposes as part of the curriculum or extra-curricular activities, and for use in the School's promotional activities, in line with the Acceptable Use, GDPR and Child Protection and Safeguarding Policies, Staff Code of Conduct and our Terms and Conditions.

Exceptions: Staff are made aware of any pupils who must not feature in photographs or videos under any circumstances (for example, because of safeguarding concerns, or because parents have withdrawn consent through the appropriate channels).

Specific Permission: For all circumstances not covered by the general permission above, specific permission must be obtained from the Headmistress prior to taking photographs or videos of pupils. Permission must also be obtained to show such images that may have been taken with permission but are then intended to be shown for purposes other than educational or promotional activities.

The School may seek specific consent from parents before using a photograph or video recording of a pupil where the School considers that the use is more privacy intrusive.

Further Guidance: Where permission has been obtained, the following should be considered:

- The purpose of the activity and what will happen to the photographs or videos should be clear. Staff must be able to justify images in their possession.
- Appropriate consents for taking and displaying photographs should be obtained from parents where necessary – staff should consult the Head of Marketing in advance to discuss this.
- All images should be made available to the Headmistress in order to determine acceptability.
- Images should not be made during one-to-one situations or taken secretly.
- Staff must ensure that the pupil understands why the images are being taken and has agreed to the activity.
- Staff must only use equipment provided or authorised by the School. Staff may not take images of children using personal mobile devices or store images of school pupils on personal IT equipment.

- If an image is to be displayed in a place to which the public have access it should not display the pupil's full name. Similarly, where a pupil is named (in a school prospectus, for example) the name should not be accompanied by a photograph, unless specific permission has been obtained from the parents.
- All images of children should be stored securely on school networks only, and only accessed by those authorised to do so. Images should not be retained for any longer than is necessary.

Appendix 10

SHARING A LOW-LEVEL CONCERN

Name and role of person to whom concern relates	
Name of person completing form	
Date(s) of concerning incident(s)	
Date of submitting this form to the DSL/Headmistress/Chair of Governors* <i>(delete as appropriate)</i>	
Time of submitting this form	
Means of submitting form: Microsoft Form/hard copy/email <i>(delete as appropriate)</i>	
Signature	

Details of concern – please include context, dates, and times, and be as precise as possible:

****All LLCs must be submitted to DSL unless about the DSL or the Headmistress. If about the DSL, send to the Headmistress. If about the Headmistress, then send to the Chair of Governors***

ACTIONS TAKEN FOLLOWING THE SHARING OF A LOW-LEVEL CONCERN FORM

Name and role of person to whom the concern relates	
Name of person who shared the concern	
Date low level concern form was submitted to DSL/Head/CoG <i>(delete as appropriate)</i>	

**Include full details in chronological order with dates.
Insert repeated subheadings as appropriate (eg it may be that more discussions and decisions are needed after the first set of actions are taken).
Some sections may not be relevant – enter 'None' or 'N/A'.**

FURTHER INFORMATION GATHERED (eg conv'n with person who submitted LLC, witnesses):
(Date / /)

CONSIDERATION OF PREVIOUS CONCERNS (if relevant):

DISCUSSIONS (eg with LADO/ Head/ HR Manager) & DECISIONS ON ACTIONS TO BE TAKEN (with rationale where appropriate):
(Date / /)

ACTIONS TAKEN:
(Date / /)

OUTCOME INCLUDING ANY WIDER ACTIONS TO BE TAKEN:
(Date / /)

Signature of DSL/Head/CoG <i>(delete as appropriate)</i>	
Date of completion of record	

Note: This form must be filed alongside the relevant 'Sharing a Low-Level Concern' form.

Appendix 11

St Helen's Enterprises Limited (STHNEL)

St Helen's School owns a separate company called St Helen's Enterprises Limited (STHNEL) which offers venue hire and the use of Sports Centre facilities outside of regular school hours to external individuals and organisations / bodies i.e. in the evenings, at weekends and during school holidays. All such organisations / bodies are expected to comply with the DfE guidance **Keeping children safe in out-of-school settings**.

STHNEL has its own Child Protection and Safeguarding Policy, its own Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs) who are all employed by the School, and its own named Board Director of Safeguarding. The DSL/DDSLs for STHNEL undertake full training to allow them to carry out their roles and this is updated regularly. The DSL for STHNEL (or a DDSL in their absence) leads on all safeguarding and child protection matters related to Enterprise activities, including informing the LADO where an allegation relating to an adult arises. The DSL for STHNEL keeps the named Board Director of Safeguarding for STHNEL, the School's DSL and the School's Headmistress fully informed of all such matters.

A member of St Helen's staff who has a safeguarding concern during a STHNEL activity (e.g. when the member of staff is using the STHNEL provision) should contact the DSL for STHNEL immediately and provide full details.

Where services or activities are provided on the school site under the supervision of adults who are not employed by the School, the DSL for STHNEL seeks assurance that the provider/body concerned has appropriate safeguarding and child protection procedures in place (including inspecting these as needed), and that arrangements are made clear for the provider to liaise promptly with the DSL for STHNEL on all safeguarding matters. This applies regardless of whether or not the children who attend any of these services or activities are pupils of St Helen's School.

Safeguarding arrangements are included in any transfer of control agreement (eg lease or hire agreement) as a condition of use and occupation of the premises; failure to comply with this leads to termination of the agreement.

DSL for St Helen's Enterprises	Nikki Watmore	Head Of Enterprises	01923 843273 or 07957764233 Nikki.watmore@sthelens.london
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