



Safeguarding & Child Protection Policy

Date of issue:	September 2025
Date for review/update:	September 2026 (or as required)
Named person responsible for review:	Designated Safeguarding Lead
Approved by:	Governing Body
POLICY CHANGES	
Date of amendments See below	Page number and update See below.

Keeping Children Safe in Education 2024 addition	Page number
<u>Para 129</u> : a note has been added to say that revised guidance on Relationships, Sex, and Health Education was published July 2025 for introduction September 2026	Page 36
<u>Para 135</u> : Updated to clarify misinformation, disinformation and conspiracy theories are safeguarding harms. <u>Para 136</u> Removed hyphen from antisemitism	Page 38

<u>Para 143</u> : Link added to the plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.	Page 40
<u>Para 143</u> : Link added to DfE guidance on the use of generative AI in education (2025) at end of filtering and monitoring (FM) section to support schools and colleges.	Page 41
<u>Paras 168 - 170</u> : information added to clarify that it was developed to help schools improve its cyber resilience.	Page 47
<u>Para 177</u> : updated to clarify ‘working together to safeguard attendance’ ‘is now ‘statutory’ guidance.	Page 49
<u>Para 184 - 187</u> : updated to remove references to funding grant support for SMHLs training as this programme has ended	Page 50 & 51
Para 190_split into paras 189 and 190 for cosmetic reasons only (to retain paragraph numbering)	Page 52
<u>Para 199</u> : has been amended to clarify that the role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.	Page 54
<u>Para 205</u> : removal of ‘spectrum’ and ‘disorder’ to align with the SEND code of practice. Updated note: We expect to publish the revised guidance on gender questioning children soon. Once published we will signpost to this guidance in KCSIE 2025.	Page 56
<u>Para 260</u> : reference to TRA’s Employer Access Service removed and replaced with new link to GOV.UK page.	Page 73 – 74
<u>Para 266</u> : references to TRA’s Employer Access Service removed and replaced with new link to GOV.UK page	Page 75
<u>Para 319</u> : reference to Employer Secure Access removed and replaced with link to GOV.UK for SI28 checks.	Page 85
<u>Para 422</u> : amended to correct the title of the Information Commissioner’s employment practice guidance.	Page 106
<u>Para 545</u> : Link added to the Lucy Faithfull Foundation’s ‘Shore Space’. which offers a confidential chat service supporting young people concerned about their own or someone else’s sexual thoughts and behaviours.	Page 140

Annexes A, B, C, D and E	
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Annex B – page 157	The definition of extremism has been updated on page 157 to reflect the definition used within the Prevent guidance.
Annex B – page 163	Link added to the CSA Centre’s Supporting practice in tackling child sexual abuse. Resources for education settings CSA Centre
Annex B – page 164	Link added to Preventing Child Sexual Exploitation – The Children’s Society. Preventing Child Sexual Exploitation The Children's Society
Annex B – page 167 & 170	Updated links to National Crime Agency and CEOP following rebranding (Thinkuknow has been retired and replaced with CEOP Education)

Appendices

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Key external contact details

Local Authority Designated Officer (LADO)	Elaine Campbell Tel: 020 7361 3000 / Mobile: 07712 236508 email: elaine.campbell@rbkc.gov.uk
Local Authority Children’s Social Services	The relevant Local Authority will be contacted: numbers for all Authorities can be found at the end of this document.
Multi-Agency Safeguarding Hub	Tel: 0207 641 3991 Email: kduncan1@westminster.gov.uk
Support and Advice about Extremism	Metropolitan Police <ul style="list-style-type: none"> • Crimestoppers: 0500555111 • Emergency: 999 • Non-emergency: 101 • Anti-Terrorist hotline: 0800 789 321

	<ul style="list-style-type: none"> • Met Police online reporting here. • Met Police reporting on possible terrorist activity here.
NSPCC Whistleblowing Advice Line	<p>0800 028 0285</p> <p>help@nspcc.org.uk</p> <p>Weston House 42 Curtain Road London EC2A 3NH</p>
Disclosure and Barring Service	<p>03000 200 190</p> <p>customerservices@dbs.gov.uk</p> <p>DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF</p>
Teaching Regulation Agency	<p>0207 593 5393</p> <p>misconduct.teacher@education.gov.uk</p> <p>Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT</p>
OFSTED Children Safeguarding	<p>0300 123 4666</p> <p>CIE@ofsted.gov.uk</p>

Key school contact details

Governors	Chair of Governors Paul Barnaby 0207 976 5456 Paul.Barnaby@fairleyhouse.org.uk
	Nominated Safeguarding Governor Lawrence Dore 0207 976 5456 lawrence.Dore@fairleyhouse.org.uk
Designated Safeguarding Lead (DSL)	Shantha Appavoo 0207 976 5456 sa@fairleyhouse.org.uk
Deputy Designed Safeguarding Lead (DDSL)	Alex Benkreira 0207 976 5456 ajb@fairleyhouse.org.uk

1. Aims

Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.

The school aims to ensure that:

- Appropriate action is always taken, in the best interests of the child and in a timely manner to safeguard and promote children's welfare. The school will hold more than one contact number for each child – one identified as the priority contact to be used for emergencies.
- All staff are aware of their statutory responsibilities with respect to safeguarding to ensure that all pupils are safe from abuse, neglect, exploitation and harm.
- Staff are properly trained in recognising and reporting safeguarding issues. The policy applies to Fairley House School and is reviewed and updated annually and is available on the school website and on parental request.

Our school will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning; Through PSHE and other curriculum contexts, pupils are encouraged to talk about feelings and deal assertively with pressures, are listened to, and know to whom they can turn to for help and advice;
- creating a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and These will be underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum;
- providing pupils with a range of appropriate adults to approach if they are in difficulties; and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it;'

- supporting the child's development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly; plus, Relationship and Sex Education and Health Education (RSHE) requirements;
- liaising and working together with other support services and those agencies involved in safeguarding children;
- ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they might or can talk to and will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including, sexual harassment, child on child abuse, 'sexting' and the displaying of 'Harmful Sexualised Behaviour';
- having a behaviour policy and anti-bullying policy that are aimed at supporting all pupils in the school;
- clear procedures are in place for addressing and minimising the risk of child-on-child abuse, including sexual violence and sexual harassment - these procedures are easily understood and easily accessible;
- acknowledging the importance of 'contextual safeguarding,' which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare;
- liaising with a range of Early Help assessment agencies that support the pupil such as Health Services, Child and Adolescent Mental Health Services, Education Welfare Services.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance **Keep Children Safe in Education 2024** and **Working Together to Safeguard Children (2025)** and the **Governance Handbook**. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.

- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence, exploitation and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights \(ECHR.\)](#)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, trans and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they are being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- [Childcare Act 2006](#), which set out who is disqualified from working with children.

This policy also takes into account the procedures and practice of Tri-borough (Hammersmith and Fulham, Kensington and Chelsea and Westminster) as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children’s Partnership for Hammersmith & Fulham, Kensington and Chelsea and Westminster.

3. Definitions

Safeguarding and promoting the welfare of children is defined (Keeping Children Safe in Education, 2024):

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- promoting the upbringing of children
- in with their birth parents, or otherwise their family network
- through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix I explains the different types of abuse. The impact on children of all forms of domestic abuse, including where they see, hear or experience their effects. Abusive behaviour is usually also harmful to the perpetrator.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix I defines neglect in more detail.

Exploitation is when an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child, young person, or adult. This can result in financial or other advantages for the perpetrator or facilitator and may involve violence or threats of violence.

Youth-produced sexual imagery is where children share nude or semi-nude images, videos or live streams.

Child sexual exploitation (CSE)

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

Child criminal exploitation (CCE)

Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines). In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Children who have been exploited will need additional support to help keep them in education.

Indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- where there are unexplainable and/or persistent absences from education

Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA.)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The chief officer of police for a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse and exploitation, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

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

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Tri-borough Multi Agency Safeguarding Hub. Our policy and procedures also apply to extended school and off-site activities.

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

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

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.
- What constitutes sexual harassment and sexual violence and why they are always unacceptable.

5.1 All staff

All staff will read and understand part I and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. Staff attendance in all safeguarding training will be monitored by the DSL and DDSL. All staff must confirm that they have read and understood all policies relating to safeguarding and pupil welfare through school designated online platform.

All staff will be aware of:

our systems which support safeguarding, including the staff code of conduct, the role and identity of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to

- children who have unexplainable and/or persistent absences from education;
- the early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- what to do if they identify a safeguarding issue or a child tells them they are being abused, exploited or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- the fact that children can be at risk of harm inside and outside of their home, at school and online;
- the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children;
- what to look for to identify children who need help or protection.

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Our DSL is the Deputy SENCo, Mrs Shantha Appavoo. The DSL takes lead responsibility for child protection and wider safeguarding. The Headteacher can be contacted by e-mail or by mobile telephone.

When the DSL is absent, the Deputy Head Teacher, Mrs Alex Benkreira, will act as cover.

If the DSL and Deputy Head Teacher are not available, the Senior School SENCO, Heather Smith, will act as cover (for example, illness, during out-of-hours/out-of-term activities).

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated:

Managing referrals

The designated safeguarding lead is expected to:

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

5.3 The governing board

The governing board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- discuss with IT and service providers what needs to be done to support the school to meet those standards Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and information sharing with our school's local multi-agency safeguarding arrangements;
- appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL;
- ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners;
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Make sure that:
 - the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
 - online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
 - the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;
 - the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members

(including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure;

- the school will keep accurate and secure written records of concerns and referrals;
 - that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse, exploitation or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

5.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including supply staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL and the Deputy Designated Safeguarding Lead have appropriate time, funding, training and resources.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3.)

Training

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.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via ebulletins, 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 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;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent Duty Guidance: England and Wales (2023) 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 SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;

and

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

All staff

All staff will receive appropriate safeguarding, child protection and Prevent training to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse, exploitation or neglect. This training will include policy and procedures for dealing with child-on-child abuse and exploitation, on-line safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), AI-CSAM (artificial generated child sexual abuse material) and whistle-blowing procedure.

The training will be regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, ebulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Volunteers will receive appropriate training, if applicable.

Governors

Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse, exploitation or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

On-line safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

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

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

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

To address the risks above, we will:

- educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology.
 - Keeping personal information private.
 - How to recognise unacceptable behaviour online.
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.
- train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year;
- educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety;

- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present;
 - staff will not take pictures or recordings of pupils on their personal phones or cameras.
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones;
- make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation;
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- carry out an annual review of our approach to online safety;
- provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively;
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Fairley House School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse and exploitation (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Fairley House School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

6. Confidentiality

Timely information sharing is essential to effective safeguarding.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.

Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.

Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix.

If a staff member is on any doubt about sharing information, they should speak to the DSL (or deputy) 7.

7. Recognising abuse and taking action

Staff, supply staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. The DSL will, if required, discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the child protection policy.

7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm.

Anyone can make a referral at: <https://www.gov.uk/report-child-abuse-to-local-council>

Tell the DSL as soon as possible if you make a referral directly.

The DSL will make prompt contact with Children's Social Care or Channel where there are concerns of immediate serious harm to the child and /or with the LADO in relation to allegations against someone working within the school and /or with the police if a criminal offence is suspected.

The date and time of any concerns raised by phone call will be logged on MyConcern by telephone will be followed up in writing within 48 hours, giving the child's name and date of birth with contact details for the family and outlining the cause of concern.

The school has a wide catchment area with children coming from most London Boroughs and outside London boroughs. In the event of uncertainty over which is the relevant Local Children's Safeguarding contact, or if advice is required on whether referral is appropriate, the Headteacher will contact the Tri borough Multi Agency Safeguarding Hub (MASH) MASH Business Support Officer Karen Duncan Team: 0207 641 3991.

LSCP 1st Floor Kensington Town Hall Hornton Street London W8 7NX, Jennifer.pearce@rbkc.gov.uk

It does not offer advice regarding individual children, but its website gives contact details for all London Safeguarding Children's Board and Partnerships: <http://londonscb.gov.uk/> The website also gives useful information on child protection procedures in London.

The Headteacher will attend Child Protection and Strategy meetings. Staff members may be asked to provide a report on a child for a Child Protection meeting.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- listen to and believe them;
- allow them time to talk freely and do not ask leading questions;
- stay calm and do not show that you are shocked or upset;
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;

- write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it;
- sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Staff are reminded that children:

- are not always ready or know how to tell someone that they are being abused, exploited or neglected;
- may not recognise their experiences as harmful;
- may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation.'

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her;

or

- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

7.4 What staff should do if they have concerned that children at risk from or involved with serious violent crime (see Appendix 1)

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

7.5 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help assessment

If early help is appropriate, the designated safeguarding lead (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. There is no requirement to gain parental consent before making a referral to a statutory agency. If the decision is made to refer the child without the parents' consent, this will be recorded with a full explanation of your decision.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

7.6 If you have concerns about radicalisation

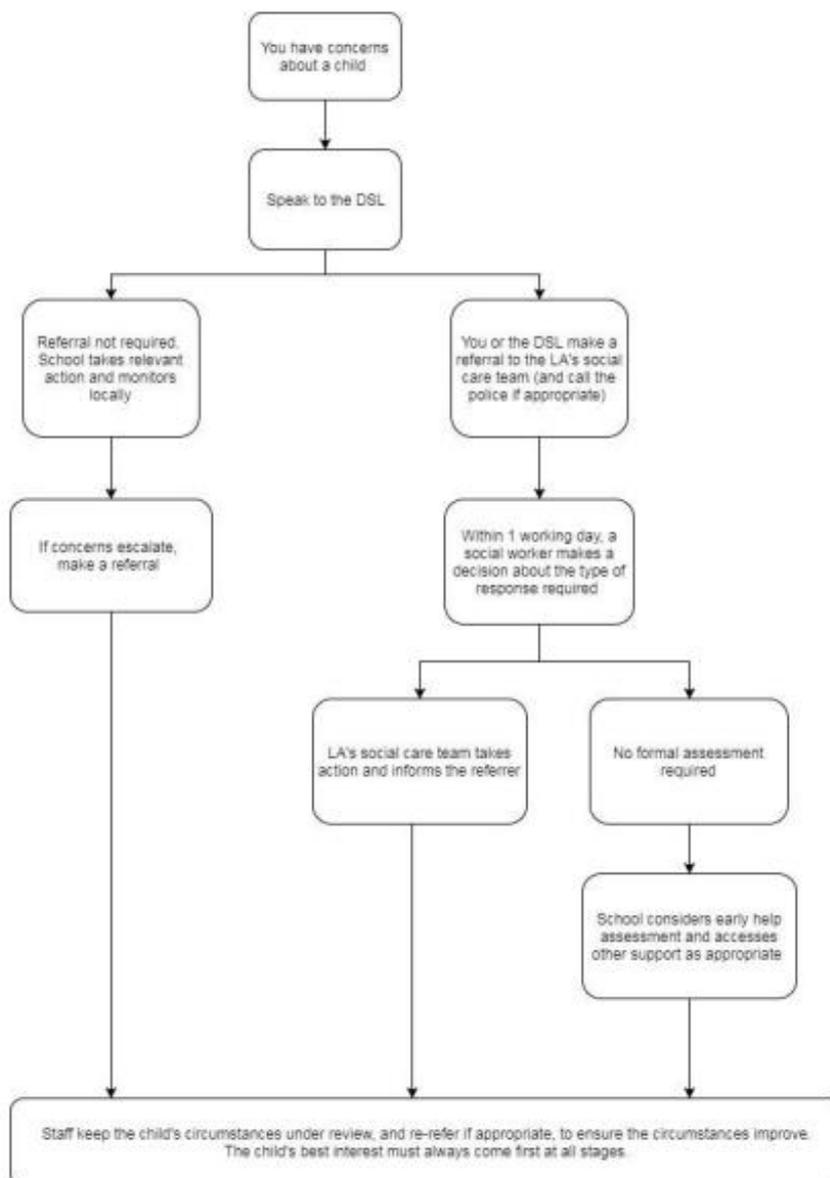
If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you: **think someone is in immediate danger, think someone may be planning to travel to join an extremist group or you see or hear something that may be terrorist related.**

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger) 20 21



7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the headteacher, (DSL). If you have concerns about the headteacher, speak to the chair of governors.

The headteacher/chair of governors/DSL will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other pupils (child on child abuse)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, up skirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, trans-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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.

These arrangements apply to all reports and concerns of child-on-child abuse and exploitation, whether they have happened in school or outside of it, and/or online. Abuse and exploitation that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh." Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them. The PSHE program addresses issues around kindness, tolerance of differences, respect and British Values. Students are made aware of the parameters of the behaviour policy through tutor time, assemblies and staff role modelling. Students are supported in recognising the Protected Characteristics and are encouraged to embrace the diverse strengths and needs of the school community through the curriculum, tutor time, and assemblies.

All child-on-child abuse is unacceptable and taken seriously.

The school recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school also recognises that certain children may face additional barriers to reporting an incident of abuse and exploitation because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The school acknowledges that even if there have been no reported cases of child-on-child abuse and exploitation in relation to pupils within the school, such abuse and exploitation may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse and exploitation, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children. The school will keep accurate and secure written records of concerns and referrals.

Across the two sites of the school posters of the names and faces of the Safeguarding Team are prominently displayed. Tutors across both sites regularly highlight the names of the Safeguarding Team and explain how students can make a disclosure. Tutors work to build secure and positive relations with each student to promote an atmosphere of openness.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The school also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and

procedures with regards to child-on-child abuse and exploitation and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The school recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Students are assured that all forms of abuse and neglect will be taken seriously. Staff will act immediately and will support the victim when they raise a concern.

Safeguarding concerns are recorded via the school's secure reporting platform, MyConcern. Staff are regularly trained on what constitutes a safeguarding concern and the protocols for reporting. The Safeguarding Team work together under the direction of the Designated Safeguarding Lead to promptly assess each referral, to work as a team to agree actions, carry out actions and ensure that the Leadership Team are part of the decision-making process and are kept abreast of the progress of assessing and responding to referrals. Investigations are conducted objectively. Statements are recorded by all affected parties, including witnesses. The voice of the child is central to assessing next steps. Support will be put in place for staff and students who are negatively affected by the situation. The Safeguarding and Leadership Teams will promptly communicate all concerns and actions with parents.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm,' staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the three safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the three safeguarding partners and/ or the Police as appropriate. The school will have regard to the procedures always set out in KCSIE and the SVSH.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the three safeguarding partners referral process.

The school will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi nudes have been shared.

In the event of disclosures about child-on-child abuse and exploitation, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and support from external agencies will be sought, as appropriate.

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s);

and

- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.}

The school will keep a written record of all concerns, discussions and decisions made.

The school will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the school will decide on an appropriate course of action. In the event that a report is proven to be false, unsubstantiated, unfounded, or malicious, the DSL will 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. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the school's behaviour policy.

7.9 If a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, exploitation and 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 DSL 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. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised unexplained and/or persistent absences from education 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).

7.10 If a child requires mental health support

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

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

7.11 How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns. For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. Mobile Technology

Staff are allowed to bring their personal phones to school for their own use but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Pupils' mobile phones and Smart Watches are collected at the start of each school day and locked away safely. They are then returned to the pupils at the end of the day.

10. Complaints and concerns about school safeguarding practices

10.1 Complaints against staff (including supply staff)

Complaints against staff (including supply staff) that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

10.2 Other complaints

If there is concern about the conduct of any adult working with children at or from FHS, it is vital that the concerns should be reported to the Headmaster or Deputy Head Teacher. In the event of their absence the allegation should be passed to the Chair of Governors. Avoid "whistleblowing" allows paedophiles to operate. (See Whistle-Blowing policy).

In the event of an allegation of abuse against a member of staff (including supply staff), advice would be taken within 24 hours from outside agencies such as the police, or the Tri-borough LSCB.

If the allegation involved serious harm, the police would be informed immediately. No internal investigation would be conducted to avoid jeopardising a police investigation. Depending on the advice received and the seriousness of the allegation, a likely outcome is that the staff member would be suspended on full pay pending a full and fair investigation of the matter. School will co-operate fully with any investigation. The reason for the suspension will not be made known to children and parents on the general public until the

outcome of the investigation is known and then only if the allegations are proven or unless information enters the public domain. (See Media Communication Policy) If colleagues are informed of the reason for suspension, they are asked not to discuss the matter out of school.

If the allegations were against the Headteacher, the Chair of Governors would be informed without the Headteacher being forewarned and, if the allegation involved serious harm, police would be informed immediately. It is likely that the Chair of Governors and Child Protection Governor would work together on managing the situation.

An allegation against a volunteer is unlikely given their extremely limited use at FHS. However, any allegation would be taken seriously, advice sought from the LADO or police and the school would cooperate with any investigation. The person concerned would not be allowed to work at the school again unless any investigation had shown the allegations to be groundless.

10.3 Staff Code of Conduct

Please refer to our staff code of conduct policy.

10.4 Acceptable use of IT

Please refer to our email and internet staff acceptable use policy.

10.5 Whistleblowing

Please refer to our whistle-blowing policy.

11. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Where children leave the school, the designated safeguarding lead 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 to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file.

- 5 days for an in-year transfer;
- or within:
- the first 5 days of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding record keeping is paper-based and stored in locked cabinets, which are located in the Headteacher's office, and the key is held by the Headteacher and Deputy Head who are designated leads. This information is kept for 50 years, following the child leaving school it is stored in a locked cabinet in our storage facility with access only by the Headteacher.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

12. Recruitment – interview/appointment panels.

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

13. Monitoring arrangements

This policy will be reviewed annually by the Deputy Headteacher. At every review, it will be approved by the full governing board.

14. Links with other policies

This policy links to the following policies and procedures:

- Behaviour Policy.
- Code of conduct Policy.
- Complaints Policy.
- Health and safety Policy.
- Information security Policy.
- Attendance Policy.
- RSHE Policy.
- First aid Policy
- Curriculum Policy
- Privacy notices.
- Whistle-blowing Policy.
- Email and internet staff acceptable use Policy.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation.

All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may need help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Indicators of abuse, neglect and exploitation

Abuse:

A form of maltreatment of a child. Somebody may abuse, exploitation or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, 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 by another child or children.

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

- **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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or persistent absences from education and youth produced sexual imagery put children in danger.

Child on child abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter," "just having a laugh" or "part of growing up," as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse and exploitation. However, all child-on-child abuse and exploitation is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence;
- could put pupils in the school at risk;
- is violent;
- involves pupils being forced to use drugs or alcohol;
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi nudes.)

- **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 unexplained and/or persistent absences from education 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. All staff should be aware of the associated risks and understand the measures in place to manage these.

- **Female Genital Mutilation**

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

- **Sharing of nudes and semi-nudes ('sexting')**

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility.)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to pupil(s);
- if a referral needs to be made to the police and/or children's social care;
- if it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed;)
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown;)
- whether immediate action should be taken to delete or remove images or videos from devices or online services;
- any relevant facts about the pupils involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual;
- whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved.)

The DSL will make an immediate referral to police and/or children's social care if:

- the incident involves an adult;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN;)
- what the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- the imagery involves sexual acts and any pupil in the images or videos is underage;
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming.)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

- **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

- **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

- **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. ³² Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

- Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting.' These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.

and,

- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - [NCSC.GOV.UK](https://www.ncsc.gov.uk)

Appendix 2: Safer recruitment and DBS checks – policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected,' so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity;)
- include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- consider any inconsistencies and look for gaps in employment and reasons given for them;
- explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - if they have a criminal history;
 - whether they are included on the barred list;
 - whether they are prohibited from teaching;
 - information about any criminal offences committed in any country in line with the law as applicable in England and Wales;
 - any relevant overseas information;
- sign a declaration confirming the information they have provided is true.

Online searches on shortlisted candidates will be implemented to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- not accept open references;
- liaise directly with referees and verify any information contained within references with the referees;
- ensure any references are from the candidate's current employer and completed by a senior person;
- where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations;
- obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- compare the information on the application form with that in the reference and take up any inconsistencies with the candidate;
- resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;
- explore any potential areas of concern to determine the candidate's suitability to work with children;
- record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- verify their identity;
- obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available Verify their mental and physical fitness to carry out their work responsibilities;
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- verify their professional qualifications, as appropriate;
- ensure they are not subject to a prohibition order if they are employed to be a teacher;
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: criminal records check for overseas applicants.
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

Regulated activity means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children;
- or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children;
- or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- there are concerns about an existing member of staff's suitability to work with children;
- or
- an individual moves from a post that is not regulated activity to one that is;
- or
- there has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- we believe the individual has engaged in relevant conduct;
- or
- we believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009;
- or
- we believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- and
- the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children. We will obtain the DBS check for self-employed contractors if they are not on the update service.

We will no longer keep copies of the DBS certificate of such checks. But we will have sight of the original certificate and record the number and issues date.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school if this takes place during term time.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers;
- carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

Governors

They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board of trustees will have their DBS check countersigned by the secretary of state. All trustees, proprietors and local governors will also have the following checks:

- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be always accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff. All staff have had access to “Prevent” training.

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, supply staff, volunteer or contractor may have abused a pupil in their care.

There is an agreed staff behaviour policy (Code of Conduct) which is compliant with (Safer Working Practices,’ and includes – acceptable use of technology, staff/pupil relationships and communications including the use of social media.

This policy applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Supply teachers – we will consider all allegations against an individual not directly employed by, where disciplinary procedures do not fully apply, (for example, supply teachers provided by an employment agency) and ensure allegations are dealt with properly and communication with supply agency and Local Authority Designated Officer (LADO) is continued throughout the investigation.

This part of the policy has two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns.’

1. Allegations that may meet the harms threshold.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- behaved in a way that has harmed a child, or may have harmed a child;
and/or
- possibly committed a criminal offence against or related to a child;
and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors, where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity. Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- redeployment within the school 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 the individual to alternative work in the school so that they do not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

Definitions for outcomes of allegation investigations

- **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 to cause harm to the 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 (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

1. Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
2. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

3. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
4. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
5. If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
6. If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
7. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The individual will be able to contact their trade union representative if they are within a union.
8. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
9. Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
10. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution.

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of

teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

Who needs to know about the allegation and what information can be shared?

How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.

What, if any, information can be reasonably given to the wider community to reduce speculation.

How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References.

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

Issues arising from the decision to suspend the member of staff.

- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Safeguarding concern or allegation from another member of staff.
- Disclosure made by a child, parent or other adult within or outside the school.
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- being overly 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;
- humiliating pupils.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported in the following ways;

- Referral to the headteacher;
- Where there are concerns/allegations about the headteacher, this should be referred to the chair of governors.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level concerns as per section 7.7 of this policy;
- empowering staff to self-refer;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- helping to identify any weakness in the school's safeguarding system.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

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

Appendix 4: Specific safeguarding issues

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

Furthermore, the School acknowledges the particular vulnerability of its pupils who are already known to the LA children's social care and need a social worker (such as those on a Child in need or Child protection plan).

There are many circumstances where a child may be absent or have unexplainable and/or persistent absences from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- have unexplainable and/or persistent absences from education
- or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school;
- come from new migrant families.

We will follow our procedures for unauthorised unexplained and/or persistent absences from education and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of unexplainable and/or persistent absences from education in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm, (abuse and exploitation) or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

New Starters

We ensure that pupils are entered on the admission register at the beginning of the first day in which we have agreed or been notified that a pupil will attend our school. If a child fails to attend on the agreed/notified date, we will try to establish contact with the parent/carer to establish the child's whereabouts. We will also check with agencies known to be involved with the family and/or check the original LA/ school that the child has moved from. We will make contact where possible. If we are unsuccessful in our enquiries, we will take measures to notify the local authority at the earliest opportunity.

Monitoring Attendance

We monitor pupils' attendance through the daily register.

We:

Monitor attendance closely and address poor or irregular attendance through daily phone calls home, weekly pastoral meetings and meetings with Heads of Key Stage / ELSA/ DSL

Refer poor attendance to the LA

Investigate any unexplained and/or persistent absences from education as part of their wider safeguarding duties

The school understands their responsibility to make a return to the local authority (an 'attendance return') with the full name and address of any pupil of compulsory school age who has failed to attend regularly (excluding codes D, K, V or B) or has missed ten consecutive school days or more with their absence being recorded in the attendance register in ways statistically recorded as unauthorised absence.

The school understands their responsibility to make a return to the local authority (a 'sickness return') where a pupil of compulsory school age has been recorded in the attendance register as absent using code I (illness) and the school have reasonable grounds to believe that the pupil will be, or will have been unable to attend school because of illness for at least 15 school days during the school year, whether consecutive or not

Where a pupil has not returned to school for ten consecutive school days after a leave of absence or is absent from school for reasons statistically recorded as unauthorised absence for twenty consecutive school days, the pupil's name can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to find out the location and circumstances of the child or have succeeded but agree there are no reasonable grounds to believe that they will attend the school again.

In deciding there are no reasonable grounds to believe the pupil will attend the school again both school and local authority must agree, including that there are no reasonable steps that could be taken (either jointly or separately) to secure the pupil's attendance.

Neither ground for deletion applies if there are reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

Recording Data

We ensure that the school's admission register (PASS) is accurate and kept up to date. As a school we: Encourage parents to inform us of any changes that occur by sending out letters and communicating with parents on a regular basis.

Where possible hold more than one emergency contact number for each pupil.

When changes do occur, we as a school will record on the admission register (PASS):

The full name of the parent with whom the pupil lives;

The new address

When Pupils Leave for another School

When we are notified by parents/carers that a pupil has been registered at another school or will be attending another school in future, we as a school will record the following information on the admissions register:

The name of the new school

The date when the pupil first attended or is due to start attending that school

When a pupil leaves, we will send a common transfer file (CTF) to the pupil's new school.

Child sexual exploitation (CSE):

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

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

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

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners.

Child criminal exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants,
- and/or
- for the financial or other advantage of the perpetrator or facilitator,
- and/or
- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

Some of the following can be indicators of CCE, children who:

- appear with unexplained gifts or new possessions;

- associate with other young people involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- have unexplainable and/or persistent absences from education for periods of time or regularly come home late, and;

County lines:

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging,’ where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines have episodes of unexplainable and/or persistent absences from education or home, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

Mental health:

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

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, neglect and exploitation, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior schoolteachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People’s Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

Teaching about Mental Health

The skills, knowledge and understanding needed by our students to keep themselves and others physically and mentally healthy and safe are included as part of our developmental PSHEE curriculum.

The specific content of lessons is in line with the statutory curriculum but will be tailored/differentiated to the specific needs of the cohort. There will always be an emphasis on enabling children and young people to develop the skills, knowledge, understanding, language and confidence to seek help, as needed, for themselves and others.

We will follow the PSHEE Association Guidance to ensure that we teach mental health and emotional wellbeing issues in a safe and sensitive manner which helps rather than harms.

(see appendix 5 for tailored social, emotional and mental health support)

Special educational needs and/or disabilities:

Adults who work with children and young people with SEND should be aware of the additional needs children may have that could mean they are more vulnerable to abuse and/or less able to speak out if something is not right.

Some children may be vulnerable because they:

- have additional communication needs
- they do not understand that what is happening to them is abuse
- need intimate care or are isolated from others
- are dependent on adults for care.
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;

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

Lesbian, gay, bi or trans (LGBT):

Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Domestic abuse:

Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Homelessness:

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals

to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

- A girl:
 - having difficulty walking, sitting or standing, or looking uncomfortable;
 - finding it hard to sit still for long periods of time (where this was not a problem previously);
 - spending longer than normal in the bathroom or toilet due to difficulties urinating;
 - having frequent urinary, menstrual or stomach problems;
 - avoiding physical exercise or missing PE; having unexplainable and/or persistent absences from education
 - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
 - being reluctant to undergo any medical examinations;
 - asking for help, but not being explicit about the problem;
 - talking about pain or discomfort between her legs.

- Potential signs that a pupil may be at risk of FGM include:
 - The girl's family having a history of practising FGM (this is the biggest risk factor to consider.)
 - FGM being known to be practised in the girl's community or country of origin.
 - A parent or family member expressing concern that FGM may be carried out.
 - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- speak to the pupil about the concerns in a secure and private place;
- activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk;
- refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alerted to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities, they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.

- Accessing extremist material online, including on Facebook or Twitter Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
- Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
- If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL, in order to identify the most appropriate referral to make, which could include a referral to Channel or Children’s Social Care.
- Staff should always take action if they are worried.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the parent immediately and other contact number we hold. In the unlikely event of not being able to get hold of anybody, a member of staff will wait for the return call. If we are unable to gain a response within an acceptable timeframe we shall contact the LADO, for further advice.

Missing pupils (within school)

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parents/carers and the police. (Please refer to Missing Pupil Policy)

Appendix 5

To support the mental health and well-being of pupils at Fairley House School we provide:

- A commitment to being responsive to children and young people's needs.
- Attentive pastoral care in small tutor groups from form tutor
- Clearly defined mental health links in school policies
- Clear guidelines for internal and external referrals
- Engagement with parents and promote family wellbeing
- Signpost staff, parents and pupils to organisations/resources that can support with emotional health and wellbeing
- Where appropriate, work with other agencies to further improve and develop emotional health and wellbeing across the community
- Liaison with specialists for pupils receiving professional support
- A reward system which recognises positive behaviour, personal and academic achievement, effort and other achievements.
- A behaviour policy which centres on Restorative Practice
- Regular opportunities to celebrate successes e.g., weekly assembly and prize giving events.
- Policies on behaviour, bullying, and SEND.
- training for staff on wellbeing and mental health
- Advice available from in-house Educational Psychologist, ELSA, speech and language/occupational therapists
- Zones of Regulation as advised by occupational therapists
- Small class sizes
- Seek to embed mental health and emotional support across the curriculum
- Whole-school or year group assemblies to discuss specific mental health and wellbeing issues
- Social and emotional needs stated and shared via Education Health and Care Plans
- Whole school approach to the development of resilience and healthy lifestyles e.g. using key dates such as Mental Health Awareness Week and World Mental Health Day as opportunities to raise the profile of mental health, holding designated health and wellbeing days, organising activities across the curriculum
- Using displays and bulletins to signpost pupils to sources of support
- Solutions Circle at staff briefings for children needing additional support

Children's Safeguarding Contacts London

If you have concerns about the safety or the well-being of a child, please contact your local authority children's social care team. Contact details are available below:

Barking & Dagenham

Telephone: 020 8227 3811

Out of hours: 020 8594 8356

Secure email: childrenservices2@lbbd.gov.uk

Barnet

Telephone: 020 8359 4066

Fax: 08715948766

Email: MASH@Barnet.gov.uk

Secure email: mash@barnet.gcsx.gov.uk

Bexley

Telephone: (Mon-Fri, 9am – 5pm) 020 3045 5440

Out of hours (including weekends): 020 8303 7777 or 020 8303 7171

Secure email: Childre socialcare.admin@bexley.gov.uk

Brent

Telephone: 020 8937 4300

Out of hours: 020 8863 5250 Fax: 020 8397 1986

Secure email: Family.FrontDoor@brent.gov.uk

Web link: [here](#)

Bromley

Telephone Children's Services (Mon-Fri 8.30 5.00pm): 020 8461 7373 / 7379 / 7026

Out of hours/weekends/public holidays: 0300 303 8671

Email (MASH): mash@bromley.gov.uk

City of London

Telephone Children's Services: 020 7332 3621 (9.00am- 5.00pm, Mon – Fri)

Email: children.duty@cityoflondon.gov.uk

Secure email: Children.Duty@cityoflondon.cjsm.net

Out of hours: 020 8356 2710

Email: emergency.duty@hackney.gov.uk

Camden

Telephone: 020 7974 3317 (9.00am- 5.00pm)

Out of hours: 020 7974 4444

Email: LBCMASHadmin@camden.gov.uk

Secure email: LBCMASHadmin@camden.gov.uk.cjsm.net

Croydon

Croydon MASH Team

Telephone: 020 8726 6400

Email: childreferrals@croydon.gov.uk

Ealing

Telephone: 020 8825 8000

Out of hours: 020 8825 8000 52

Fax: 020 8825 5454

Email: ECIRS@ealing.gov.uk

Secure email: Via Egress: please telephone if unable to access Egress directly.

Enfield

Telephone: 020 8379 5555

Out of hours: 020 8379 1000

Email: spoe@enfield.gov.uk

Secure email: spoe@enfield.gcsx.gov.uk

Greenwich

Telephone referrals: 020 8921 3172 (Mon-Thur, 9.00-5.30pm, Fri 9.00-4.30pm)

Out of hours: 020 8854 8888 Fax: 020 8921 3180

Secure email: MASH-referrals@royalgreenwich.gov.uk

Hackney

Hackney First Access Screening Team (FAST)

Telephone: 020 8356 5500

Out of Hours: 020 8 356 2710 Fax: 020 8356 5516 / 17

Email: fast@hackney.gov.uk

Secure email: fast@hackney.gov.uk or fast.account@hackney.cjsm.net

Hammersmith and Fulham

Telephone: 020 8753 6600

Out of hours: 020 8748 8588

Fax : 020 8753 4209

Email: familyservices@lbhf.gov.uk

Haringey MASH

Telephone: 020 8489 4470 MASH

Out of hours: 020 8489 0000

Email: MASHReferral@haringey.gov.uk

LSCB Telephone: 020 8489 3145 / 5837

LSCB Email: lscb@haringey.gov.uk

Harrow

Telephone: 020 8901 2690

Out of hours: 020 8424 0999

Fax: 020 8861 1816

Secure Email: duty&assess@harrow.gov.uk.cjsm.net 53

Havering

Telephone: 01708 433 222

Out of hours: 01708 433 999

Fax : 01708 433 375

Email : tmash@havering.gov.uk

Secure email: tmash@havering.gcsx.gov.uk

Hillingdon

Telephone: 01895 556633

Out of hours: 01895 556633
Email: lbhmash@hillingsdon.gov.uk

Hounslow

MASH Office number: 0208 583 4303
Safeguarding Referral line: 0208 583 6600 (option 2 and then 3)
Children's referral email: childrensocialcare@hounslow.gov.uk
MASH email: MASH@hounslow.gov.uk

Islington

Telephone: 020 7527 7400
Out of hours: 020 7226 0992
Email: CSCreferrals@islington.gov.uk
Secure Email: CSCT@islington.gcsx.gov.uk

Kensington and Chelsea

Telephone: 020 7361 3013
Out of hours: 020 7373 3227 Fax: 020 7368 0228
Email: socialservices@rbkc.gov.uk

Kingston Upon-Thames

Contact our children's Single Point of Access (SPA) Team (Open 8.00-6.00 pm, Mon-Fri)
Telephone: 020 8547 5008
Secure Email: spa@kingston.gov.uk.cjism.net
Out of Hours Duty Social Worker: If you need to speak to someone urgently outside of hours, please ring the Duty Social Worker on: -
Telephone: 020 8770 5000

Lambeth

Telephone: 020 7926 5555 (24 hours)
Email: helpandprotection@lambeth.gov.uk
Secure Email: helpprotection@lambeth.cjism.net

Lewisham

Telephone: 020 8314 6660
Out of hours: 020 8314 6000
Secure Email: mashagency@lewisham.gov.uk

Merton

Telephone: 020 8545 4866/3736
Out of hours: 020 8770 5000
Fax : 020 8545 4198
Email : mertonLSCB@merton.gov.uk

Merton

MASH:
Telephone: 020 85454227 (Out of Hours: 020 8770 5000)
Secure Email: MertonLSCB@merton.gov.uk.cjism.net

Newham

Telephone: 020 8430 2000

Triage Golden Number: 020 3 373 4600
Fax: 020 8430 1003
EDT: 020 8430 2000
Secure Email: ChildrensTriage@newham.gcsx.gov.uk

Redbridge
Telephone: 020 8708 3885
Out of hours: 020 8708 5897 (after 5.00pm and weekends)
Email : cpat.referrals@redbridge.gov.uk

Richmond
Contact our children's Single Point of Access (SPA) Team (8.00-6.00pm, Mon-Fri)
Telephone: 020 8547 5008
Out of hours: 020 8770 5000
Secure Email: spa@richmond.gcsx.gov.uk

Southwark
Telephone: 020 7525 1921
Out of hours: 020 7525 5000
Fax: 020 7525 7992
Secure Email: MASH@southwark.gov.uk

Sutton
Telephone: 020 8770 6001 55
Out of hours: 020 8770 5000
Email: mash@sutton.gov.uk
Secure Email: mash@sutton.gov.uk.cjism.net

Tower Hamlets
Telephone: 020 7364 5606 / 5601
Out of hours: 020 7364 4079
Fax: 020 7364 2656 / 2655
Secure Email: MASH@towerhamlets.gcsx.gov.uk

Waltham Forest
Telephone: 020 8496 2310
Out of hours: 020 8496 3000 Fax: 020 8496 2313
Secure Email: MASH_requests@walthamforest.gov.uk

Wandsworth
Telephone: 020 8871 6622
Out of hours (after 5pm): 020 8871 6000
Email: IPOC@wandsworth.gov.uk
Secure Email: ipoc@wandsworth.cjism.net

Westminster
Telephone: 020 7641 4000
Out of hours: 020 7641 6000
Fax: 020 7641 7526
Email: accesstochildrens-services@westminster.gov.uk