

# St Olave's Prep School

## Safeguarding/Child Protection Policy



<b>Date of Last Review:</b>	September 2023
<b>Date agreed by Trustees:</b>	September 2022
<b>Name of Designated Safeguarding Lead for Child Protection, including for EYFS:</b>	Miss Anna McNamara
<b>Name of Deputy Designated Safeguarding Lead for Child Protection:</b>	Miss Claire Holloway, Mrs Alison Farrell, Mrs Fiona Pons (Wellbeing Lead), Alison Farrell (Family Liaison Officer)
<b>Name of Trustee for Safeguarding/Child Protection:</b>	Dr Nuyen Raju
<b>Date shared with all staff:</b>	September 2023
<b>Date of next review:</b>	September 2024





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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Anna McNamara	<a href="mailto:a.mcnamara@stolaves.org.uk">a.mcnamara@stolaves.org.uk</a>
Deputy DSL	Claire Holloway	<a href="mailto:c.holloway@stolaves.org.uk">c.holloway@stolaves.org.uk</a>
Local authority designated officer (LADO)	Catrin Gruffydd Jones	<a href="mailto:catrin.gruffyddjones@royalgreenwich.gov.uk">catrin.gruffyddjones@royalgreenwich.gov.uk</a>
	Tania Haimbe	<a href="mailto:tania.haimbe@royalgreenwich.gov.uk">tania.haimbe@royalgreenwich.gov.uk</a> <a href="mailto:childrens-lado@royalgreenwich.gov.uk">childrens-lado@royalgreenwich.gov.uk</a> 0208921 2351 or 3930
Chair of Trustees	Peter Houillon c/o Sarah Brame Clerk to the Trustees	<a href="mailto:s.brame@stolaves.org.uk">s.brame@stolaves.org.uk</a>
Channel helpline		020 7340 7264

## Safeguarding Team

			
Miss McNamara Designated Safeguarding Lead (DSL) Assistant Headteacher Pastoral & Inclusion Year 5 Teacher	Miss Holloway Deputy Designated Safeguarding Lead (DDSL) Headteacher	Mrs Farrell Deputy Designated Safeguarding Lead (DDSL) Family Liaison Officer	Mrs Pons Deputy Designated Safeguarding Lead (DDSL) Wellbeing Lead

### 1. Policy Statement

As a school, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued.

We maintain an attitude of **'it could happen here'** where safeguarding is concerned, and promote a culture of openness where children have a voice and are listened to.

This policy provides staff, volunteers and Trustees with the framework required in order to keep children safe and secure in our school. Its purpose is also to inform parents and carers of how we will safeguard their children whilst they are in our care.

The procedures contained in this policy apply to all staff, volunteers and Trustees and are consistent with those of the Greenwich Safeguarding Children's Partnership (GSCP) and locally agreed procedures.

This policy takes account of the "Keeping Children Safe In Education"<sup>1</sup> September 2022' statutory guidance and makes frequent references to it. [KCSIE 2023](#)

This policy provides information regarding different types of abuse, and encompasses other statutory and non-statutory documentation and legislation (shown in Appendix 2 of this policy).

The policy outlines the procedures that the school has in place to ensure all children in our care receive effective support, protection and justice. Preventative education is effective within our whole school approach and prepares children for life in modern Britain with a zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, transphobic and sexual violence/harassment.

***The policy is hyperlinked to relevant statutory documentation and guidance to provide easy access for additional information/clarification.***

### 2. Definition of Safeguarding

As defined in statutory guidance

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

### 3. Aims and Values

#### 3.1 Aims

- To ensure all staff are aware of their statutory duty to safeguard the children in their care.
- To ensure staff are trained to recognise and report safeguarding concerns, ensuring appropriate action is taken in a timely manner to safeguarding and promote children's welfare
- To support the development and understanding of children in how to protect themselves from potential abuse and equip them with the skills needed to support their mental-wellbeing.

#### 3.2 Values

- To uphold children's rights to feel safe and protected from harm
- To work effectively in partnership with other agencies for the benefit of children
- To ensure the interest of the child is paramount in all safeguarding decisions made and actions

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<sup>1</sup> 'Keeping Children Safe in Education' September 2022 statutory guidance [KCSIE 2022](#)

taken<sup>2</sup>.

### 4. Roles and Responsibilities

#### 4.1 The Board of Trustees Roles & Responsibilities<sup>3</sup>

(KCSIE Part 2 and 3)

4.1.1 Trustees promote a child-centred whole school approach to safeguarding which underpins all relevant aspects of process and policy development, and promote a culture of respect, where staff and children are listened to and all concerns raised are followed up.

4.1.2 The Board of Trustees have nominated a Trustee who will be responsible for Safeguarding and Child Protection, and has ensured that all Trustees (including those new to the role) have a clear understanding of their statutory responsibility to safeguarding those who use the school.

#### 4.1.3 The Board of Trustees will ensure that:

- An annual review of the school's safeguarding policy procedures adheres to the Royal Borough of Greenwich guidance and locally agreed interagency procedures
- The policy is made available publicly, on the school website or on request;
- The safer recruitment procedures as outlined in KCSIE part 3 are robustly implemented and all appropriate checks are carried out on staff and volunteers who work with children;
- A senior member of the school's leadership team is designated to take lead responsibility for dealing with safeguarding and child protection (including online safety). To provide advice and support to other staff, liaising with the local authority, and working with other agencies. The Designated Safeguarding Leader (DSL) will receive appropriate training, funding and time to carry out the role effectively as outlined in his/her job description.
- Annual staff training is prioritised to ensure all staff are equipped to carry out their responsibilities for child protection effectively. Also, that all temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities;
- The school has clear systems and processes in place for identifying possible mental health concerns, including routes to escalate response and clear accountability systems<sup>4</sup>
- There are robust systems in place for the induction of new staff on the school's safeguarding procedures and relevant policies (CP policy, behaviour policy, staff code of conduct, procedures regarding children who are missing or absent from education and the role of the DSL) [Click here for Attendance and Punctuality Policy](#)
- An appropriate whistleblowing policy/procedure is in place to encourage any staff member or volunteer to report concerns regarding safeguarding practice in school
- The school has clear procedures for dealing with allegations of abuse made against members of staff and volunteers that comply with guidance from the local authority and locally agreed

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<sup>2</sup> The school will work openly with parents/carers as far as possible, but it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

<sup>3</sup> Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to [KCSIE 2022](#) guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

<sup>4</sup> Further information can be found in the [mental health and behaviour in schools' guidance](#)

interagency procedures;

- Procedures are in place for regular evaluation of the effectiveness of safeguarding systems, including adherence to safer recruitment procedures and checks on the effectiveness of online safety (including the filtering strategies<sup>5</sup>), as outlined in [KCSIE 2022](#) (para 141).
- With staff welfare in mind, the Governing Body will consider the necessity and appropriateness of arranging for 'Safeguarding Supervision' for the DSL and Deputy DSLs within the school.
- 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

### 4.2 Headteacher's Role and Responsibilities

In line with the statutory guidance (KCSIE 2023), the Headteacher will ensure that systems and procedures are in place to support all staff to understand their individual and collective roles in safeguarding and promoting the welfare of children.

The Headteacher will ensure:

- The policies and procedures adopted by the governing body or proprietor are fully implemented, and followed by all staff.
- The DSL has a clear and concise job description, explicitly referring to the role of taking **lead responsibility** for safeguarding and child protection (including online safety and filtering and monitoring systems)
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate.
- There are arrangements in place for DSL availability to cover any out of hours or out of term time activities taking place.
- Induction procedures are robust and meet the requirements outlined in [KCSIE 2023](#) (para 560)
- A barred list check is completed and a risk assessment is in place, to ensure any individual who starts before a DBS certificate is received is appropriately supervised.
- Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns.
- The school will take the lead role in the investigation of any allegation concerning a supply teacher in post and will keep the supply agency informed throughout.
- The school is satisfied that any alternative providers used by the school or visitors attending in a

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<sup>5</sup> [Online filtering and monitoring](#)

professional capacity have appropriate safeguarding procedures in place.

- The school curriculum provides regular opportunities for children to learn about personal safety and how to protect themselves from harm in an age appropriate way.
- Online safety training is included in staff safeguarding and child protection training, including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring
- Early years providers oversee the safe use of technology, mobile phones and cameras in the setting

### 4.3 The Designated Safeguarding Lead's Role and Responsibilities

The DSL will act to meet the requirements of the role, as outlined in [KCSIE 2023](#) (Annex C), which includes (but is not limited to):

- Referring cases of suspected abuse, neglect, radicalisation or allegations to the relevant statutory agencies (children's social care, the police or the Channel programme)
- Act as a source of support, advice and expertise to staff within the school
- Liaise as appropriate with staff, including IT technician, the SENCo, the designated teacher for LAC, the virtual headteacher and the named person with oversight for mental health.
- Promote positive engagement with parents and/or carers to safeguard children and support families facing challenging circumstances
- Champion educational outcomes for vulnerable children and those who have or have had a social worker
- Have procedures in place to reassess concerns when a child's situation fails to improve
- Ensure procedures and guidance are in place to ensure all searches of pupils are witnessed (including the appointment of an appropriate adult for strip searches <sup>6 7</sup>) and all searches for prohibited items are logged on the school safeguarding reporting system. See also guidance in appendix 6
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

#### 4.3.3 Record keeping

- Maintain clear, concise and confidential records of the concern, action taken and outcome
- Ensuring safe and secure transfer of records when a child leaves the school.

#### 4.3.4 Promoting a culture safeguarding and training

- Maintain his/her own secure and up-to-date knowledge of safeguarding developments and share as appropriate with staff in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP)
- Understand the assessment process for providing early help and intervention, for example

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<sup>6</sup> [PACE Code C 2019](#)

<sup>7</sup> [searching screening and confiscation July 2022](#)

through locally agreed common and shared assessment processes, such as the Royal Greenwich Early Help Guidance [Click here](#)

- 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 safeguarding/child protection policy and procedures, especially new or part-time staff.
- Ensure all staff have robust induction training, covering safeguarding/child protection, and are confident to recognise and report any concerns about children's safety and welfare immediately as they arise
- Promote a culture of listening to children and building trusting relationships to support those children who find difficulty in approaching staff with a concern.
- Ensure all staff are aware of the additional risks that children with Special educational needs and disabilities face online
- Ensure all staff are aware of the guidance [What to do if you are worried a child is being abused](#)
- Ensure staff are aware of contextual safeguarding and extra-familial harm from the influence of factors outside of school or in the child's own family, including vulnerability to possible abuse, exploitation and youth violence.
- Provide feedback and reassurance to staff who have raised a child protection concern

#### **4.4 The Role & Responsibilities of Staff and Volunteers**

- 4.4.1 At the start of the academic year, (or commencement of employment if starting at the school during the academic year), all staff will sign a declaration to indicate that they have read and understood 'Keeping Children Safe in Education' part I and the school's Safeguarding/child protection policy. (Those working directly with children will read 'Keeping Children Safe In Education' Annex B.) In signing this, staff are indicating that they understand their statutory duty to safeguard children and to report any concerns.
- 4.4.2 All staff will familiarise themselves with the signs of abuse and neglect (Appendix I, attached) so that they are able to identify children who may be in need of help or protection.
- 4.4.3 All staff will ensure they understand and can follow the school's procedures for reporting concerns
- 4.4.4 Staff members will maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- 4.4.5 All staff will:
- Know the role and identity of the Designated Safeguarding Lead and Deputies.
  - Read carefully the behaviour policy and the online safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring
  - Be aware that mental health problems can be an indicator that a child has suffered abuse, neglect or exploitation
  - Recognise that a disclosure may come directly from the child, or from a third party, e.g., friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse
  - Recognise that child-on child abuse (all forms, including physical and sexual violence and



harassment, sexting, 'up skirting'<sup>8</sup>, bullying and initiation/hazing) must not be downplayed and must be taken seriously and appropriately reported

- Be aware of indicators which may signal involvement with violent crime (absences from school, changes in friendship groups or relationships with older individuals/groups, decline in performance or unexplained injuries). Also, the increased likelihood of involvement of being male or permanently excluded from school.

4.4.6 Staff will take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (*without promising they will not tell anyone*). Ensuring the victim or person disclosing is not given the impression they are causing a problem by reporting a concern or abuse.

4.4.7 Staff will read carefully any documentation provided by the DSL to update their safeguarding training.

4.4.8 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them

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

## 5. Strategies and Procedures to Support Safeguarding

### 5.1 Promoting Equality

5.1.1 Some children have an increased risk/vulnerability to abuse. They can face additional barriers with respect to recognising or disclosing concerns. The school is committed to anti-discriminatory practice and recognises children's diverse circumstances. We ensure that all children have the same protection, regardless of additional barriers they may face.

Children who may be more vulnerable include:

- Children who are young carers
- Children who may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Those who have English as an additional language
- Children known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Children at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Children who are asylum seekers
- Those at risk due to either their own or a family member's mental health needs
- Children looked after or previously looked after
- Children missing or absent from education for prolonged periods and/or repeat occasions

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<sup>8</sup> Changes to the Voyeurism (Offences) Act 2019 criminalises the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

## Safeguarding

- A child whose parent/carer has expressed an intention to remove them from school to be home educated

5.1.2 The school recognises that children with special educational needs or disabilities (SEND) or those with certain health conditions can face additional safeguarding challenges. Staff recognise the need to

- Explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability
- Recognise these children as being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Understand that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Overcome the barriers and difficulties in communication with these children.

### 5.2 Trained Workforce

5.2.1 All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, to provide them with relevant skills and knowledge to safeguard children effectively.

5.2.2 The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training and disseminate information to staff.

5.2.3 Any newly appointed DSL will attend the DSL one-day training, provided by the Royal Borough of Greenwich Direct Services to Schools, or another accredited training provider, followed by the GSCP Working Together course, before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.

5.2.4 All Trustees will receive annual safeguarding training to support them in understanding their statutory duties. All new Trustees will have safeguarding training as part of their induction. The designated Trustee for Safeguarding and Child Protection will undertake Trustee safeguarding training annually.

5.2.5 The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read 'Keeping Children Safe in Education' (Part 1 and Annex B)

5.2.6 All new members of staff will receive safeguarding training as part of their induction programme.

5.2.7 At least one member of every appointment panel will have gained accreditation through Safer Recruitment training (statutory requirement).

### 5.3 Safer Recruitment

The statutory guidance will be followed (see KCSIE Part 3)

- Outlining the school's commitment to safeguarding and promoting the welfare of children in all advertising.
- At least one safer recruitment trained adult will undertake the shortlisting and be present on any

interview panel.

- Providing a copy or link to the school's CP/ safeguarding policy to applicants.
- Requesting a self-declaration at interview so any relevant information can be discussed.
- Seeking references prior to interview and checking employment history
- Carrying out pre-employment checks (including the applicant's online presence) and recording required information on the school's Single Central Record.

### 5.4 Embedding High Standards of Behaviour

The school's behaviour policy promotes positive and respectful behaviour of staff and pupils.

5.4.1 All school staff have been trained to challenge any child-on-child abuse in all its forms. (see Appendix I in this policy)

- 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.
- Staff will challenge derogatory or sexualised language and inappropriate behaviours including that carried out online.
- Deliver a curriculum to educate children about appropriate behaviour and developing positive relationships
- Staff will tackle prejudice and promote empathy through awareness and acceptance of differences. A whole school approach will be adopted to tackling sexism and challenging homophobic language, banter and racist language.
- Staff will be vigilant concerning all forms of bullying physical, emotional and verbal.

### 5.5 Referral to Family and Adolescent Support Services (formerly called Early Help)

Royal Greenwich FaASS supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. FaASS is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Staff are alert to the potential need for FaASS for a child who:

- is disabled and has specific additional needs, including certain medical needs
- has special educational needs
- is a young carer
- is showing signs of engaging in antisocial or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- is showing early signs of abuse and/or neglect.

Further information can be found from:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

FaASS consultation line 0208 921 2267

[Mash-referrals@royalgreenwich.gov.uk](mailto:Mash-referrals@royalgreenwich.gov.uk)

### 5.6 Recognising Abuse and Taking Action

5.6.1 All staff and volunteers must be aware that the main categories of abuse are:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

5.6.2 All staff and volunteers must act in accordance with this policy if a child presents with indicators of abuse<sup>9</sup>

5.6.3 Staff will follow the guidance in this policy for dealing with a disclosure or reporting concerns (see Appendix 3)

5.6.4 If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must provide the DSL with a signed and dated electronic record of their concerns.

5.6.5 All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.

5.6.6 Staff will follow the guidance in Appendix 3 if a child discloses that he/she has been abused in some way.

5.6.7 Staff must be aware that an incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or personal expressions/comments when recording the disclosure.

5.6.8 The DSL (or in his/her absence, the Deputy DSL) will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

**MASH Consultation Line Tel- 0208 921 2267 or contact**

**RBG LADO/RBG Schools' Safeguarding Officer on 0208 921 3930.**

5.6.9 Referrals will be made as soon as possible by telephone **and the appropriate forms completed and sent at the same time.** Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172

**Multi Agency Safeguarding Hub  
Children's Services'  
Safeguarding and Social Care, 1<sup>st</sup> Floor  
The Woolwich Centre,  
Wellington Street,  
Woolwich, London  
SE18 6HQ**

5.6.10 If the DSL has raised a safeguarding concern but does not feel that appropriate action has been taken by Royal Borough of Greenwich Children's Services, he/she should use the RBG Safeguarding

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<sup>9</sup> (See Appendix 1 in this policy for brief details of types of abuse and [KCSIE 2023](#) ( part 1 and Annex B for greater detail)

## Safeguarding

Children's Partnership escalation policy to take this further. (This is available on the GSCP website, click on the professional's tab)

### 5.7 Reporting Concerns and Record Keeping (see also Appendix 3 )

5.7.1 The school uses an electronic system CPOMS to record concerns. If an electronic system is used in the school any paper notes etc must be scanned and held electronically. These documents provide an accurate factual account of the concern and action taken by the school.

5.7.2 The completed forms/records will be kept for the duration of the child's school career and when a child changes school the forms/records will be forwarded securely to the new setting.

5.7.3 Records will include

- Clear and comprehensive summary of concern
- Details of how concern was followed up
- Note of any action taken, decision reached and outcome

5.7.4 The information contained will be regarded as confidential. Any request for access to the information by non-Greenwich Safeguarding Children Partnership Agencies (e.g., Solicitor, investigating agent) will be referred to the Headteacher/DSL, who is advised to seek legal advice before acting.

5.7.5 All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely, with access only for the DSL, Deputy DSL's and Headteacher.

### 5.8 Appropriate Filtering and Monitoring

5.81 Kcsie 2023 obliges schools to "ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

5.82 At St Olaves Prep School the internet connection is provided by LGfL. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called WebScreen 3, which is made specifically to protect children in schools. You can read more about why this system is appropriate on the UK Safer Internet Centre's appropriate filtering submission pages [here](#).

5.83 There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. Physical monitoring (adult supervision in the classroom, at all times)
2. Internet and web access
3. Active/Pro-active technology monitoring services

Further detail of the school's approach to online safety can be found in the school's [Online Safety Policy](#).

## 6. Dealing with Concerns/Allegations Made Against School Staff, Supply Staff, Volunteers and Contractors<sup>10</sup>.

6.1 There are two levels of concern/allegation

- Allegations that may meet the harm threshold
- Allegations/concerns that do not meet the harm threshold ('low level concern')

**Please refer to Appendix 7**

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<sup>10</sup> [KCSIE 2023](#) Part 4 also see Appendix 3 attached to this policy

- 6.2 An allegation that meets the 'harm threshold' is any information which indicates that a member of staff (including supply staff), volunteer or contractor may have:
- behaved in a way that has, or may have harmed a child
  - possibly committed a criminal offence against or in relation to a child
  - behaved towards a child or children in a way which indicates s/he would pose a risk of harm to children
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children<sup>11</sup>
  - behaved in a way contrary to the Staff Code of Conduct
- 6.3 Any concern or allegation should be reported immediately to the Headteacher. The Headteacher will follow the guidance in [KCSIE 2023](#) part 4 and outlined in Appendix 4 in this policy.
- 6.4 The Headteacher will assess whether it is necessary to refer to the Local Authority Designated Officer (LADO) to determine the next step. The Headteacher will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.
- 6.5 If the concern or allegation meets any of the five criteria set out in section 6.2 (i.e., may meet the harm threshold) then the Headteacher shall contact the RBG LADO without delay, and provide the LADO with written confirmation of the allegation.
- 6.6 The Headteacher shall, as soon as possible, following briefing from the LADO, inform the subject of the concern or allegation. (If the concern or allegation involves a supply teacher/staff or contractor, the agency will be informed and invited to share any information relating to previous concerns or allegations)
- 6.7 If there is an allegation or concern raised against the Headteacher, then the Board of Trustees should be contacted. He/ will inform the LADO and follow guidance in [KCSIE 2023](#) (Part 4) and Appendix 4 in this policy
- 6.8 Following the outcome of any investigation, there is a legal requirement for employers to make a referral to the DBS, where they consider whether the individual has engaged in conduct that harmed or is likely to harm a child, or if they pose a risk of harm to a child. Consideration must also be made, if it is appropriate, to refer to the Teacher Regulation Agency (TRA) for them to determine if the individual should be banned from teaching.

## **7 Dealing with Concerns/Allegations Against Other Children – Child on Child Abuse**

- 7.1 This policy recognises that children are capable of abusing their peers. Any allegations will be investigated appropriately by reporting concerns to the DSL. Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of 'initiation procedures', sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.

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<sup>11</sup> This applies to behaviours outside the school environment, in the adult's personal, professional or community life.

## Safeguarding

- 7.2 All staff should understand that, even if there are no reports of it in their school, it does not mean it is not happening, it may be the case that it is just not being reported.
- 7.3 All staff understand the importance of challenging inappropriate behaviours between peers. **There will be a zero-tolerance approach to sexual violence and sexual harassment.** Staff will not downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys,” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- 7.4 Victims (and alleged perpetrators) of child-on-child abuse or bullying will be supported as for any other form of abuse and in their best interests.
- 7.5 Child-on-child abuse can manifest itself in many ways. The curriculum, and in particular the PSHEE/RSE curriculum, provides regular opportunities for the school to help children safeguard themselves from new technology and through learning about personal safety.
- 7.6 The school provides regular online safety information for children and they are given key information from CEOP and other online safety sites.

## 8 Confidentiality

- 8.1 Safeguarding in schools raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have the responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the DfE guidance (July 2018)<sup>12</sup>. It identifies seven golden rules for sharing information. It reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 (and 2020 update) and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- 8.2 If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff / volunteer tells the child in a manner appropriate to the child’s age / stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.
- 8.3 Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

## 9 Communication with Parents

- 9.1 Parents and carers will be made aware of the school safeguarding/child protection policy through published information and in initial meetings with the school. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.
- 9.2 The Board of Trustees makes this Safeguarding/CP policy available to parents, carers and children through the school website. A hard copy is also available on request.

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<sup>12</sup> [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers](#)

## 10 Monitoring and Evaluation

- The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Governing Body. This policy will be reviewed in line with the timescale and details set out on the front cover.
- Trustees and school leaders will implement a strategy to evaluate the effectiveness of safeguarding procedures including ensuring safer recruitment procedures are robustly implemented and online protection is regularly assessed.

## 11 Linked Policies/Procedures

Anti-bullying policy

Child Protection

Medical Needs

E-safety policy

ICT policy

Acceptable use agreements

Behaviour policy

Equalities policy

Asthma

Whistleblowing

Safer Recruitment in schools

Induction policy

Drugs in school

Staff Code of Conduct (staff behaviour policy)

CSE/CCE

Photography policy

Female Genital Mutilation (FGM)

Forced Marriage

Intimate care policy

Positive handling/ Physical restraint

Relationships and Health Education (RHE)

Health Education

Attendance

Health and Safety

Curriculum policy



## Appendix I: Types and Indicators of Abuse

(to be read in conjunction with 'Keeping Children Safe In Education' [KCSIE 2022](#) Part I and Annex B)

**NB. This abbreviated guidance provides a useful reminder of the types and indicators of abuse but **MUST** be considered within the context of a comprehensive training programme and reference to relevant sections in [KCSIE 2022](#) (Part I and Annex B). This guidance is not a substitute for more in-depth consideration of harm.**

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### Definitions of child abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children, including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development needs. The impact of witnessing the ill treatment of others may also cause harm to the child. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can occur in families, institutions or community settings. The alleged perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

#### 1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or any other act of 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.

**Possible indicators of Physical Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries, including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

#### 2. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It may involve

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- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Possible indicators of Emotional Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical/ mental and/or emotional developmental lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

### 3. Sexual Abuse

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

**Possible indicators of Sexual Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling

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- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD \*
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

### 4. Neglect

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

**Possible indicators of Neglect** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

### Additional safeguarding issues<sup>13</sup>

#### Mental Health

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. Education 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. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

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

#### Honour Based Abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour, often involves a wider network or family or community pressure and can include multiple perpetrators.

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<sup>13</sup> Further detail to be found in [KCSIE 2022](#) Annex B

- **FGM mandatory reporting duty**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty upon teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover that 'FGM appears to have been carried out on a girl under 18'<sup>14</sup>.

- **Possible indicators of Female genital mutilation (FGM)**

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

- **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 75-80 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk). See also Royal Borough of Greenwich Safeguarding Children Partnership website:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

### **Children who are absent from Education<sup>15</sup>**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We will give special consideration to pupils who are missing or absent from education for prolonged periods and/or repeat occasions.

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<sup>14</sup> [Statutory duty to report FGM](#)

<sup>15</sup> [CME statutory guidance](#)

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A child going missing or is absent from education is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour based abuse or risk of forced marriage. Staff should be aware of their school's unauthorised absence and children missing from education procedures.

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

### Private fostering

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home

If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important to notify Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172

### Preventing Radicalisation

#### Extremist ideology, radicalisation and terrorism

Children and young people can suffer harm when exposed to extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

**Extremism:** the vocal or active opposition to our fundamental British values. This also includes calling for the death of members of the armed forces.

**Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Terrorism:** an 'action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system'. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods, such as social media or the internet. Staff should use their own judgement in identifying children at risk of radicalisation and report to the DSL, who may decide to make a Prevent referral.

**PREVENT DUTY** - Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales<sup>16</sup> is specifically concerned with schools (but also covers childcare). It places the requirements on schools in four general themes: Risk assessment, working in partnership, staff training and IT policies

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and an understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation.

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<sup>16</sup> [Revised Prevent Duty guidance for England and Wales 2019](#)

## Safeguarding

- The Prevent duty builds on existing local partnership arrangements and takes into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents/the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures, unless they have specific reason to believe that to do so would put the child at risk.
- Schools need to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.
- If a Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of vulnerability.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** <sup>17</sup>.

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, or through violence/the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, etc. Children can be exploited by adult males, females, individuals or groups or by other children (who themselves may be experiencing exploitation).

**CSE** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet. CSE can be a one-off occurrence and may happen without the child's knowledge, e.g. by sharing videos or images on social media.

Any child who has been coerced into engaging in sexual activities is being abused or exploited. This includes 16 and 17 year olds who can legally **consent** to have sex. Some children may not realise they are being exploited, for example if they believe they are in a genuine, romantic relationship.

**CCE** is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in the manufacture of drugs, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity, as perpetrators can threaten their families with violence or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims.

#### **Possible indicators of CSE and CCE**

- Having unaffordable/unexplained gifts or new possessions
- Going missing from home or care or coming home late
- Associating with other young people involved in exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Changes in emotional well-being
- Drug or alcohol misuse
- Unexplained injuries

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<sup>17</sup> See Annex B [KCSIE 2022](#) for further information

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### Further indicators of CSE include

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

**County lines** is where gangs and organised criminal networks transport illegal drugs, both locally and across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and transport money, sometimes from urban areas to suburban and rural areas, market/seaside towns. Offenders will often use coercion, intimidation and serious violence (including sexual violence and weapons) to ensure compliance of victims. There may also be a threat of violence to the victim and their families can be used to trap the victim in continued criminality.

### Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include<sup>18</sup>:

- Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection
- As a victim or perpetrator of serious violence (e.g. knife crime)
- In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

### Child-on-child/ child on child abuse<sup>19</sup>

Children can abuse other children. This is generally referred to as child-on-child abuse, can take many forms and can happen both inside and outside of school and online. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- **sexual violence** such as rape, assault by penetration; sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence); 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
- **sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Sexual harassment is likely to violate a child’s dignity, make them feel intimidated, degraded or humiliated.
  - o deliberately brushing against or interfering with someone’s clothes (this may cross into sexual violence)
  - o displaying pictures, photos or drawings of a sexual nature
  - o consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - o **upskirting**, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

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<sup>18</sup> Other indicators found in [KCSIE 2022](#) Annex B

<sup>19</sup> Further information in [KCSIE 2022](#) Part 5

Note: Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This is referred to as “harmful sexual behaviour” (HSB) and can occur online and/or face-to-face and can also occur simultaneously

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***Information regarding the definitions and signs of further safeguarding issues, including homelessness, modern slavery, cybercrime, children with family members in prison and children and the court system, etc. can be found in [KCSIE 2022](#) Annex B***



## Appendix 2 Statutory Guidance, Legislation and Advice:

### Statutory Guidance, legislation and advice includes:

- [The Children Act 1989 and 2004 amendment](#)
- [The Education Act 2002 \(section 175\)](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Keeping Children Safe in Education 2022](#)
- [Dealing with Allegations of Abuse Against Teachers and Other Staff](#)
- [Working Together to Safeguard Children \(2018\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- [Searching, screening and confiscation \(July 2022\)](#)
- [What to do if you're worried a child is being abused \(March 2015\)](#)
- [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#)
- [Domestic Abuse Act 2021](#) updated July 22
- [Designated teacher for looked-after and previously looked-after children \(February 2018\)](#)
- [UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people \(2017\)](#)
- [Greenwich Safeguarding Children Partnership.](#)
- [Children Missing Education, September 2016](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education, April 2019](#)
- [NSPCC](#)
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [Statutory guidance on the Prevent duty](#)

### Other useful documents include:

[Inspecting Safeguarding in Early years Education and Skills](#)

[RBG Interagency referral form](#)

## Appendix 3: Records and Referral

### A. Record Keeping and Referral Guidance - The School must:

- Keep clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken
- Keep Child Protection information in separate files (these may be electronic) by the designated teacher and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by case conference, but may not need to know all the confidential details.
- Ensure all records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, are kept securely/scanned and uploaded to the electronic system (CPOMS) by the DSL. All documents must be dated and the person completing the form named.
- Ensure all child protection conference minutes are stored in the confidential files kept by the Designated Safeguarding Lead.

- B. **Recording Concerns** - Initial concerns, incidents or disclosure by a child must be reported to the DSL. Staff understand that some children may not feel confident in reporting concerns or may not have the language in which to do so. Staff need to create a safe space for the child to speak (this especially true for LGBT, EAL and SEND children who wish to share concerns)

A copy of a body map should be used to record injuries/marks/bruises on CPOMS.

The following information must be recorded:

- time, date, place and people who were present
- exact details of what was said the by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred

Details of injuries, marks or bruises - provide detail including number, length of marks, description of marks, colour of marks/bruises etc. Staff to record other relevant details - including information about previous incidents which may not have been reported but now seem relevant.

The DSL or staff as directed should continue to monitor for concerns and maintain a chronology of concern.

### C. Recording a disclosure – the adult should:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light
- Listen to what is being said without displaying shock or disbelief
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as “Tell me,” and “How did that happen?”
- Do not ask leading questions but, if necessary, the member of staff **can** ask the question: ‘have you been harmed’ and ‘how’?
- Not criticise the alleged perpetrator
- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Find out just enough to be sure of the need to refer

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- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells, nor should any abuser be questioned.
- Sign and date the record of disclosure
- Speak with the Designated Safeguarding Lead for Child Protection, and provide him/her with the signed, dated written record, using the agreed school procedures, without delay.

### **D. Referrals (see also flow chart)**

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussion with parents
- information provided to social services
- decisions taken (with times, dates and signed)

The designated teacher will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

### **Reports for Child Protection Conferences/Core Group Meetings**

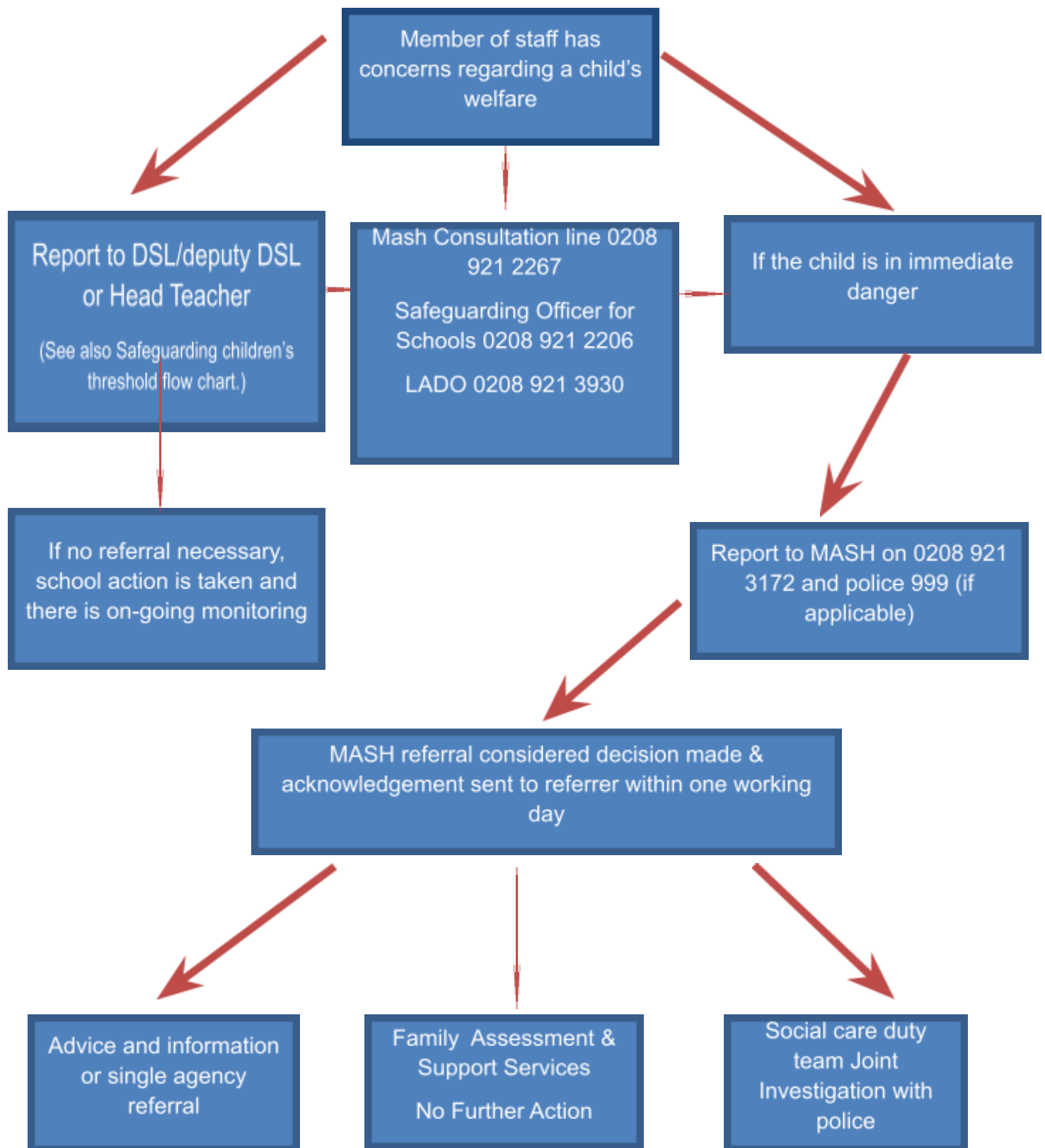
Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns.

They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

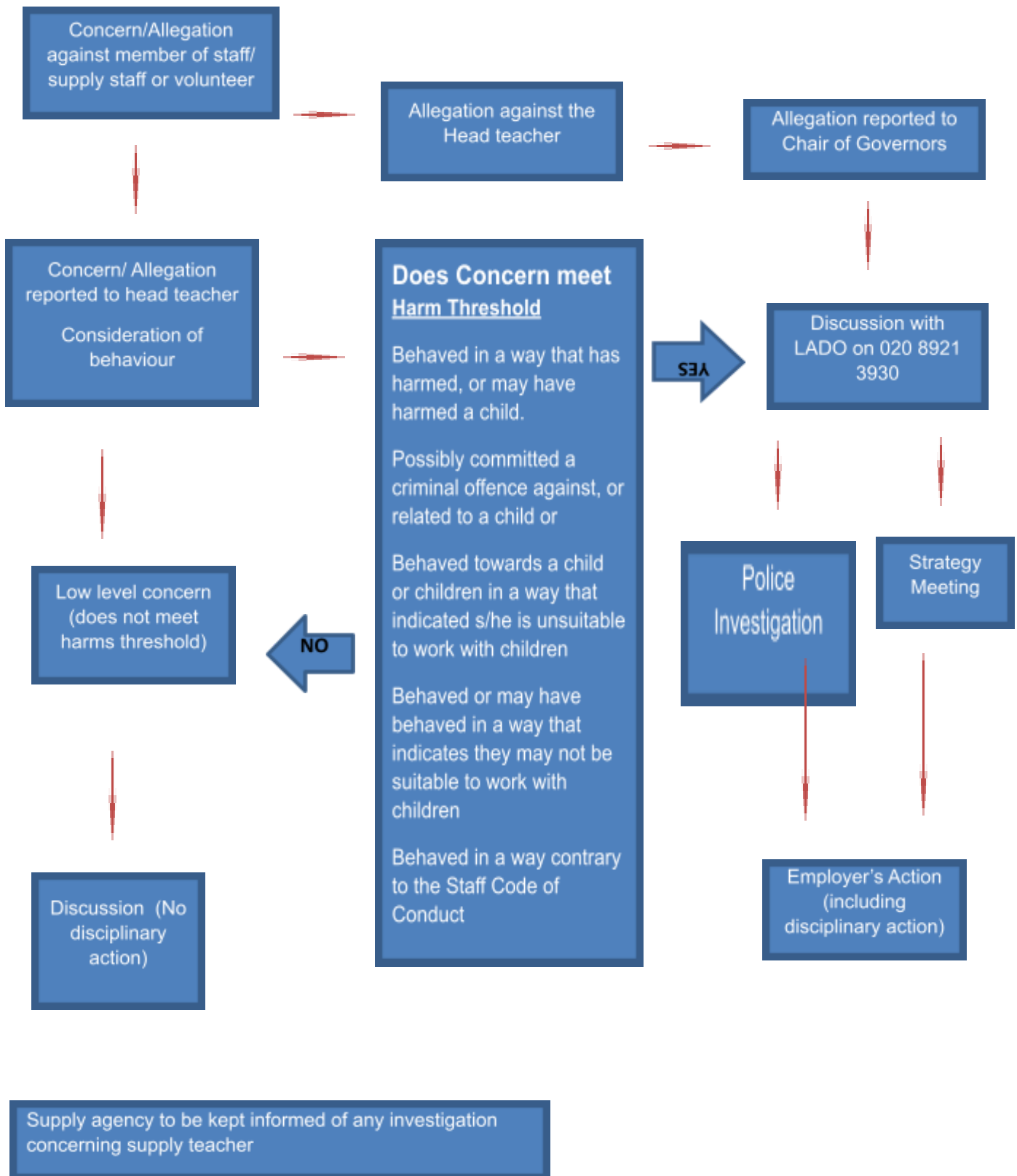
*If appropriate, the DSL should consider discussing the content of the report with the parent/carer in advance of any CP conference to help maintain a trusting and effective partnership.*

Appendix 3 continued: Reporting concerns about a child

**Flow Chart for Reporting Concerns**



**Appendix 4: Managing and Reporting Concerns or Allegations Against School Staff, Supply Staff, Volunteers and Contractors**





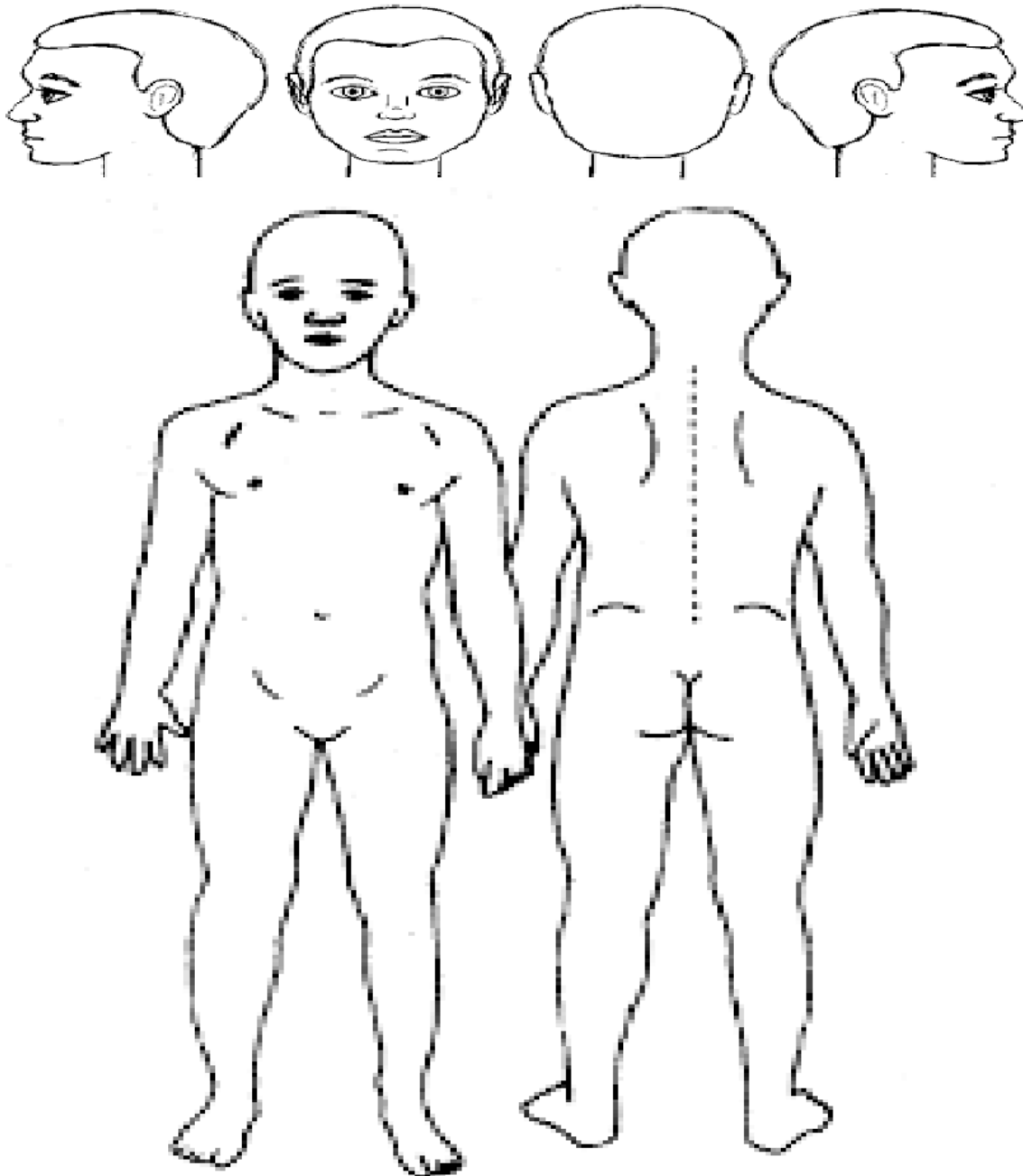
Safeguarding

Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.

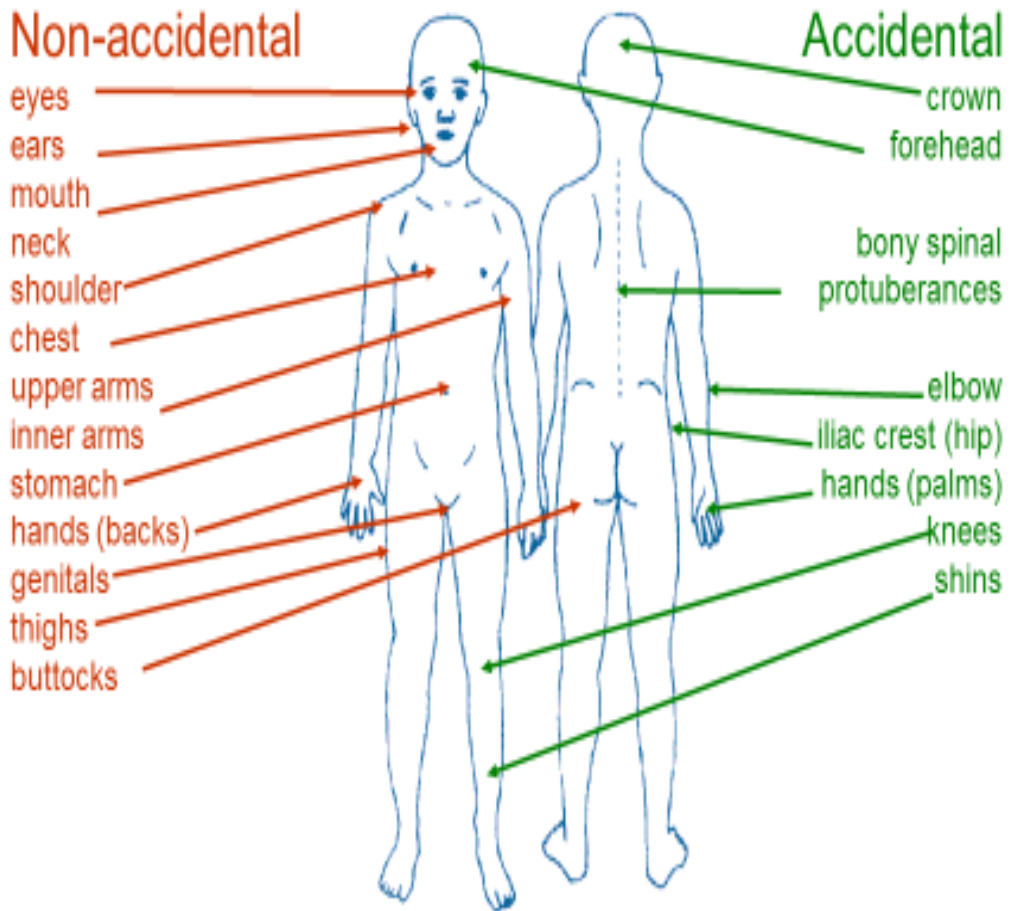
Child's Name -----



Observations made by----- Signed-----Date

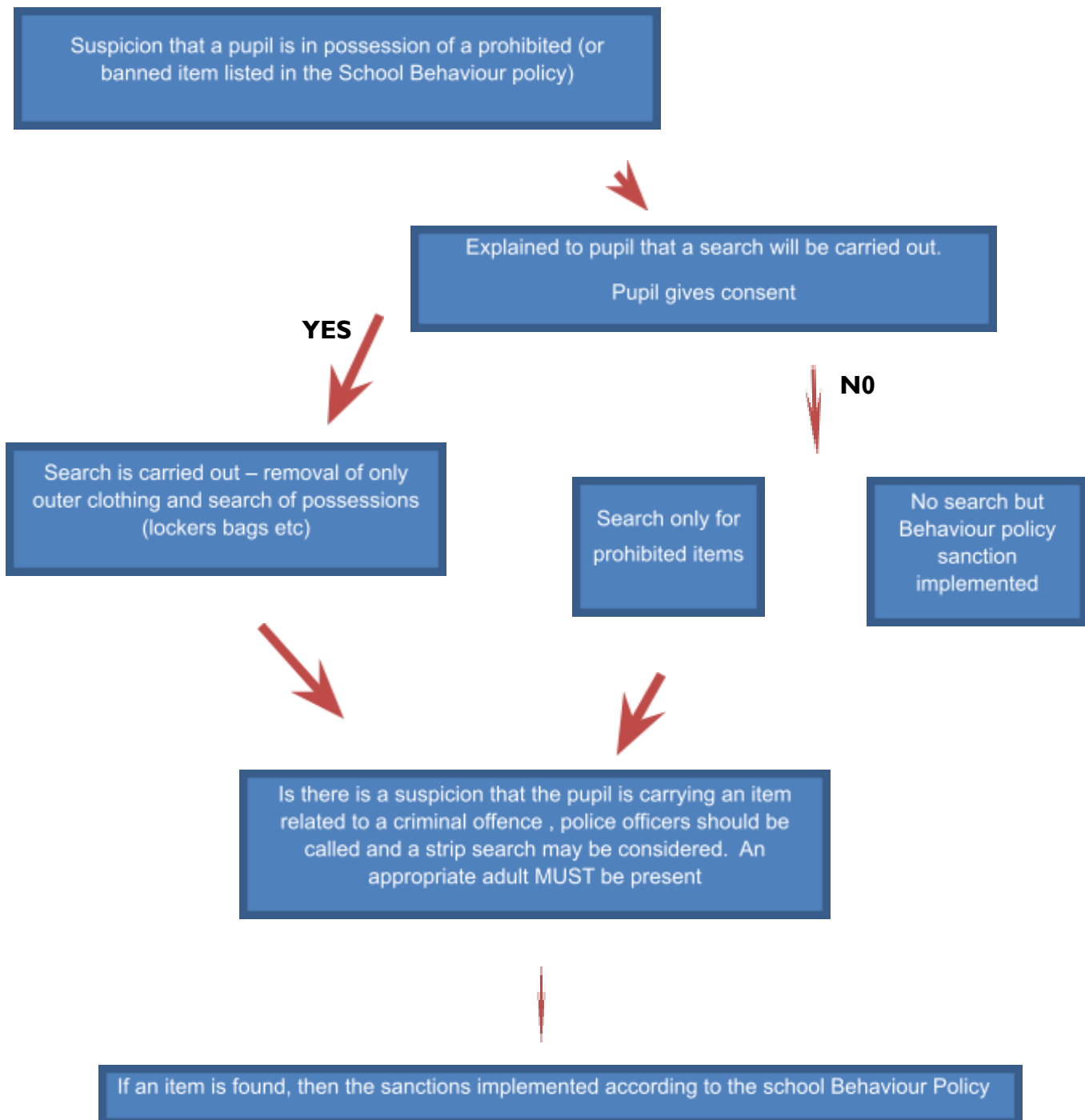
Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail safe mechanisms. Red indicates a possible non-accidental injury. Green is the more usual sites for accidental injuries.

## Common Sites





## Appendix 6 Searching pupils for prohibited and banned items



### Note:

- All searches should be carried out with pupil's permission if possible and should be undertaken by a member of staff who has been authorised to do so by the headteacher.
- The person carrying out the search should be the same sex as the pupil and searches should be witnessed by a second adult member of staff.
- Searches will only require pupils to remove outer clothing (i.e., not worn wholly next to the skin or immediately over underwear).
- Strip searches can only be carried out by police officers. School staff should retain a duty of care/well-being for the pupil involved at all times.

## Safeguarding

- An appropriate adult must be present e.g., the parent/carer or a staff member (the school should facilitate the parent/carer as an appropriate adult if possible).
- Unless requested otherwise by the pupil, the appropriate adult should be the same sex as the pupil being searched.
- A record of all searches for prohibited items must be made by the DSL and the parents informed.

### Guidance:

If there is a suspicion that the pupil is carrying an item related to a criminal offence, call the police. Do not investigate further. Police Officers attending may consider a more thorough search using their powers under the Police and Criminal Evidence Act (PACE). In these circumstances an Appropriate Adult MUST be made available for the pupil and must be present during this procedure.

An Appropriate Adult would not be required if the police are attending the school to support a child (pupil) who has reported a crime or is the victim of a crime. For example, police officers from the Child Abuse Investigation Team (CAIT), or the reporting of a street robbery where the pupil has been the victim of this act.

See the KCSE 22 link When to call the police. Guidance for Schools and Colleges.

### What is the aim of an appropriate adult?

The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

Here is how the law describes the role:

- "To safeguard the rights, entitlements and welfare of juveniles and vulnerable persons to whom the provisions of this and any other Code of Practice apply". *Police and Criminal Evidence Act 1984 Code C 1.7A*
- "To act as appropriate adults to safeguard the interests of children and young persons detained or questioned by police officers". *Crime and Disorder Act 1998 s.38(4)*

<https://www.appropriateadult.org.uk>

## Appendix 7

### Low level Concerns

This section is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education. This 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 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- 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
- 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
- Using inappropriate sexualised, intimidating or offensive language

### Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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
- Have clear policies and procedures
- Empowering staff to share any low-level concerns
- 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

### Reporting a low level concern

- Low level concerns about a member of staff should be reported to the Headteacher as per the school's Child Protection procedures. If the concern is about the Headteacher this should be reported to the Chair of Trustees.
- Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- Staff should use the school's Low-Level Concerns Reporting Form (below)

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct.
- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

### **Record keeping**

All low-level concerns will be recorded in writing (form below)

In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **Reviewing a low level concern**

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).
- If the concern relates to volunteers, or any other concerns arise, schools can contact the LADO for further advice.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Low Level Concern Form

This form can be used to share any concern with the Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the School Code of Conduct (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low-level concern arose, plus details, which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident/s. (Continue on separate sheets as necessary). The form should be signed, times and dated.

### Details of CONCERN:

<b>Name of Staff member :</b>	<b>Department and Role :</b>
<b>Signed :</b>	<b>Time and Date :</b>

<b>Received by :</b>	
<b>At [time] :</b>	<b>Date :</b>

<b>WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].</b> <b>NO</b> <input type="checkbox"/> - Give a brief but valid reason/explanation for not;	
<b>YES</b> <input type="checkbox"/> - Please complete detail below - <b>STAFF MEMBER'S RESPONSE TO CONCERN :</b>	
<b>ACTION TAKEN :</b>	
Was advice/guidance sought from the LADO and or Human Resources? Yes : <input type="checkbox"/> No : <input type="checkbox"/>	
<b>Signed :</b>	<b>Dated :</b>

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible; however, in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

