

# SAFEGUARDING & CHILD PROTECTION POLICY

Date: September 2023

Next Review: September 2024

Responsibility: Full Governing Board

## 1. Aims

The governors and all school staff recognise that all children have a fundamental right to learn in a safe environment and to be protected from harm.

Young people are less likely to learn effectively and go on to lead positive and independent lives if they are not kept healthy and safe. This school is therefore committed to providing an environment which is safe and where the welfare of each child is of paramount importance. This will include a commitment to ensuring that all pupils feel confident that any concerns they may have will be listened to and acted upon.

The Governing Board of Larmenier & Sacred Heart Catholic Primary School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

## 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE) statutory guidance [Keeping Children Safe in Education \(September 2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). The school complies with this guidance and the arrangements agreed and published by the school's 3 local safeguarding partners (**Local Safeguarding Children Partnership (LSCP)** - *Hammersmith & Fulham Council, Royal Borough of Kensington and Chelsea, Westminster City Council, Central West Basic Command Unit (Police) and the Clinical Commissioning Groups*).

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 one person conducting an interview to be trained in safer recruitment techniques
- [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 Counter-Terrorism 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 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, gender reassignment and race). This means that governors and the Headteacher should carefully consider how they are supporting pupils with regard to these characteristics. The Act allows the school to take positive action to deal with particular disadvantages affecting pupils (where it can show it's 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're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that the school must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps the school 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
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

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

**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 2 explains the different types of abuse.*

**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 2 defines neglect in more detail.*

**Sharing of nudes and semi-nudes** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**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 the school understands 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, the school 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, the school will think carefully about what terminology is used (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. The school 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, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. The school is committed to anti-discriminatory practice and recognise children's diverse circumstances. It ensures that all children have the same protection, regardless of any barriers they may face.

The school gives special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions, *See section 9*
- 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 Female Genital Mutilation (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, *See section 11.*
- Are missing or absent from education for prolonged periods and/or repeat occasions
- 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 the Local Safeguarding Children Partnership (LSCP). The school's 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 and discipline policy
- Pastoral support system
- Planned programme of relationships, sex 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 female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

## ***Appendix 1: Important School and Local Authority Contacts***

### **5.1 All Staff**

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- The school's systems which support safeguarding, including this Safeguarding & Child Protection Policy, the Code of Conduct for staff, students on placement and volunteers, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the Behaviour & Discipline Policy, the Technology Policy Part 2 – Online Safety and Wellbeing, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education and the safeguarding response to children who are missing or absent from education (CME).
- The early help 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 LA Family Services 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 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 and neglect, 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 are being 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 (LGBT) can be targeted by other children.

- What to look for to identify children who need help or protection.
- **Section 15** and **Appendix 5** of this policy outline in more detail how staff are supported to do this.

## 5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Leadership Team. The school's DSL is Tina O'Sullivan and the deputy DSLs are Jennifer McGinty (Headteacher), Angela Cahill and Alastair Ross. The DSL takes lead responsibility for safeguarding and child protection.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The Headteacher will be available to staff for any out of hours/out of term activities, e.g. residential school journey.

When the DSL is absent, the deputies (identified above), will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (LA Family Services, Prevent, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy are set out in their job description.

## 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 and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy, ensure 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 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 the Computing and IT Lead what needs to be done to support the school in meeting these standards
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - The DSL has lead authority for safeguarding
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - All staff are aware of and understand their responsibilities with respect to the IT filters and monitoring systems in place, manage them effectively, and know how to escalate concerns **(See Technology Policy Part 2-Online Safety and Wellbeing 2.3 and 2.16)**
  - 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
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse 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 4**).

All governors will read Keeping Children Safe in Education in its entirety. A signed record will be kept as evidence to show governors have received and read this document.

**Section 15** of this policy has information on how governors are supported to fulfil their role.

## 5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers;
  - Are informed of the school's systems which support safeguarding, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training 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 4*)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable.

## 5.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCO, social workers, mental health leads and others.

## 6. Confidentiality

The school expects a high level of confidentiality from all members of staff (including students on placement and volunteers) and ensures that each member of staff is aware that:

- 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
- If they need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- They should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's guidance on [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support them if they have to make decisions about sharing information
- If they are in any doubt about sharing information, they should speak to the DSL or deputy DSL.

Confidentiality is also addressed in this policy with respect to record-keeping in *section 12*, and allegations of abuse against staff in *Appendix 4*.

## 7. Recognising Abuse and taking Action

Staff, student teachers on placement, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, any references to the DSL means “the DSL (or deputy DSL)”.

### 7.1 If a Child is Suffering or likely to Suffer Harm, or in Immediate Danger

Make a referral to Family Services and/or the police **immediately** if it is believed a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see *section 5.2*) as soon as possible if a referral has been made directly to Family Services.

Contact should be made to family services Front Door service (ICAT) on 020 8753 6600, out of hours on 020 8748 8588 or via email at [familyservices@lbhf.gov.uk](mailto:familyservices@lbhf.gov.uk)

The following link can also be used for reporting child abuse to the local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a Child makes a Disclosure

If a child discloses a safeguarding issue, the following actions should be undertaken by the individual hearing the disclosure:

- Listen to the child and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show feelings of shock or upset
- Tell the child they have done the right thing in telling. Do not tell them they should have disclosed this sooner



- Explain what will happen next and that this information will need to be passed on. Do not promise to keep it a secret
- Write up the conversation as soon as possible in the child's own words, recording the information on the school's Safeguarding Report Form (*Appendix 7*). Stick to the facts, and do not put personal judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Family Services and/or the police directly (see 7.1), and tell the DSL as soon as possible that this has been the case. 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.

Bear in mind that some children may:

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

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

See *Appendix 8* for further guidance.

### **7.3 If it is Discovered that Female Genital Mutilation (FGM) has taken place or a Pupil is at Risk of FGM**

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 5*.

**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 Family Services 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 the 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 the local safeguarding procedures.

For information on when and how to report on FGM please see [Mandatory Reporting of Female Genital Mutilation – procedural information](#) (Home Office).

Further information and advice can be obtained from the following LA contacts:

Rochell-Ann Naidoo, Lead for FGM

Telephone: 020 7641 1610

Email: [rmaidoo@westminster.gov.uk](mailto:rmaidoo@westminster.gov.uk)

Megan Brown, Safeguarding in Education Manager- LBHF

Telephone: 02087535125

or Contact Family Services: Hammersmith and Fulham: 020 8753 6600

## **7.4 If there are Concerns about a Child (as Opposed to Believing a Child is Suffering or likely to Suffer from Harm, or is in Immediate Danger)**

**Figure 1 (above) illustrates the procedure to follow if staff have any concerns about a child's welfare.**

Where possible, the member of staff raising the concern should speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. A member of the SLT should be approached and/or advice taken from LA Family Services. Advice can be sought at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to LA Family Services directly, if appropriate (*see 'Referral' below*). Share any action taken with the DSL as soon as possible.

### **Early help**

If early help is appropriate, the DSL 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.

The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to LA Family Services if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Contact should be made to Family Services (Front Door) on 020 8753 6600 or via email at [familyservices@lbhf.gov.uk](mailto:familyservices@lbhf.gov.uk).

### **Referral**

If it is appropriate to refer the case to LA Family Services or the police, the DSL will make the referral or support a member of staff in doing so.

If a referral is made directly (*see section 7.1*), the DSL must be informed as soon as possible.

The LA 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 LA 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 follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

At all stages, staff should keep the child's circumstances under review (involving the DSL), and re-refer if appropriate to ensure the child's circumstances improve – the child's best interests must always come first.

## **7.5 If there are Concerns about Extremism**

The school recognises that in keeping children safe, it has a duty to have due regard to the need to prevent pupils from being drawn into terrorism. This duty is known as the Prevent Duty. The Prevent Duty (part of the government's overall counter-terrorism strategy, CONTEST) is seen as part of the school's wider safeguarding obligations. DSLs and other senior leaders will follow the latest statutory guidance set out in [Prevent Duty Guidance: for England and Wales](#) (Home Office, April 2019).

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible, staff should speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. A member of the SLT should be approached and/or advice sought from LA Family Services or Prevent. A referral should be made to LA Family Services directly, if appropriate (*see 'Referral' above*). The DSL should be informed as soon as practically possible after the referral has been made.

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 LA Family Services.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil.

Staff can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, a member of staff should call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related.

## **7.6 If there are Concerns about Pupil 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. 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.

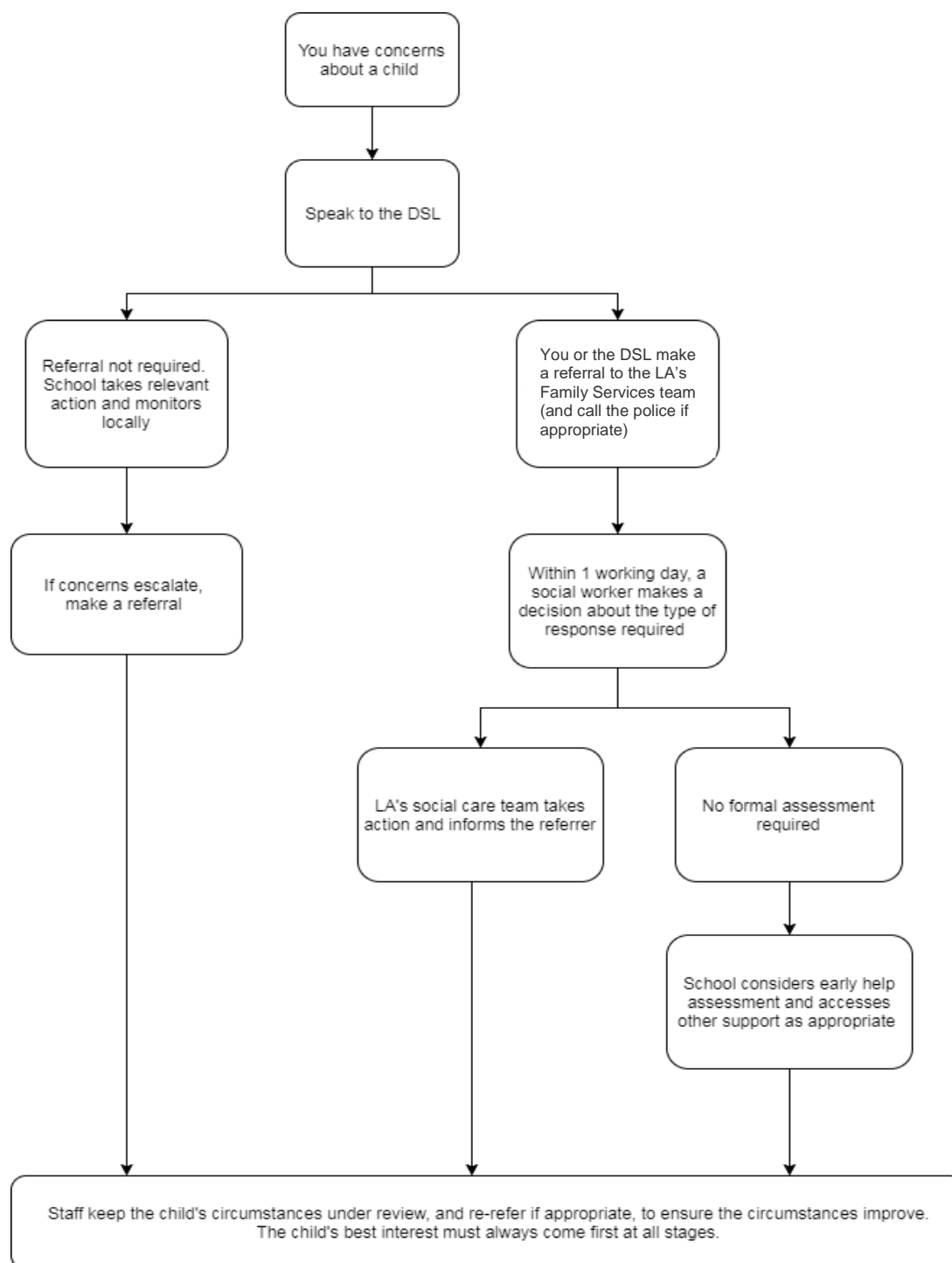
If a member of staff has a mental health concern about a child that is also a safeguarding concern, they should take immediate action by following the steps in section 7.4.

If they have a mental health concern that is **not** also a safeguarding concern, they should speak to the DSL to agree a course of action.

See the DfE guidance on [mental health and behaviour in schools](#) for more information.

**Figure 1: Procedure if there are concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## 7.7 Staff Contact with Pupils

In order to minimise the risk of accusations being made against staff as a result of their daily contact with pupils, all school staff should follow the school's expectations regarding professional conduct (See *Appendix 6*).

The use of control and physical restraint is a last resort and should only be considered in exceptional circumstances to keep a child safe and/or those around them safe. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances. In all cases, a record will be made and parents/carers informed.

In order to support more vulnerable pupils, a positive and proactive approach is taken towards planning behaviour support, e.g. by drawing up individual behaviour plans and agreeing them with parents/carers. It is recognised that this approach can reduce the occurrence of challenging behaviour and the need to use reasonable force.

For further guidance see:

- 'Keeping Children Safe in Education' - Full Guidance (DfE, September 2023), paragraphs 163-165 (pages 42-43) on '*The use of 'Reasonable Force' in Schools and Colleges*' which includes guidance in relation to children identified as SEND.
- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444051/Use\\_of\\_reasonable\\_force\\_advice\\_Reviewed\\_July\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf).

## 7.8 Concerns about a Staff Member, Supply Teacher, Volunteer or Contractor

If there are concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.

The Headteacher/Chair of Governors will then follow the procedures set out in *Appendix 4*, if appropriate.

Where it is believed that there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see *Appendix 4* for more detail).

## 7.9 Allegations of Abuse made Against other Pupils

The school recognises 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.

It is also recognised that the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under the school's Behaviour & Discipline Policy, but the Safeguarding & Child Protection 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, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

See *Appendix 5* for more information about child-on-child abuse.

### **Procedures for Dealing with Allegations of Child-on-child Abuse**

If a pupil makes an allegation of abuse against another pupil:

- The staff member must record the allegation and tell the DSL, but should not investigate it
- The DSL will contact LA Family Services and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. The school will ask the police if it has any questions about the investigation.

### **Creating a Supportive Environment in School and Minimising the Risk of Child-on-child Abuse**

The school will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including the requesting or sending of sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring the curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils are able to easily and confidently report abuse using the schools reporting systems (as described in section 7.11 below)
- Ensuring staff reassure victims that they are being taken seriously
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Supporting children who have witnessed sexual violence, especially rape or assault by penetration. The school will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensuring staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). The school will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a penalty accordingly. The school will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – the school will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is ongoing

## **7.10 Sharing of Nudes and Semi-Nudes ('sexting')**

See Technology Policy Part 2 – Online Safety and Wellbeing Part 2, Section 2.20

## **7.11 Reporting Systems for Pupils**

Where there is a safeguarding concern, the school will take the child's wishes and feelings into account when determining what action to take and what services to provide.

The school recognises the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, the school will:

- Ensure that pupils are taught in their Relationships and Health Education (RHE) lessons to speak to a trusted adult in school if they have any concerns or wish to report anything that makes them feel uncomfortable.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

## **8. Online Safety**

See Technology Policy Part 2 – Online Safety and Wellbeing Part 2 Section 2

## **9. Notifying Parents/Carers**

Where appropriate, the school will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

If the school believes that notifying the parents/carers would increase the risk to the child, the DSL or staff member will discuss this with LA Family Services before doing so.

In the case of allegations of abuse made against other children, the school will normally notify the parents/carers of all the children involved. The school will think carefully about what information it provides about the other child involved, and when. It will work with the police and/or LA children's social care to make sure its approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## **10. Pupils with Special Educational Needs and/or Disabilities (SEND)**

The school recognises that pupils with Special Educational Needs and/or Disabilities (SEND) or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEND being disproportionately impacted by behaviour such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these barriers.

The school offers extra pastoral support for pupils with SEND, as appropriate.

## **11. Pupils with a Social Worker**

Pupils may need a social worker due to safeguarding or welfare needs. The school recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where the school is aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support.



## 12. Looked-After and Previously Looked-After Children

The school will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe.

In particular, the school will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads.
- The school has appointed a designated teacher, Tina O'Sullivan (DSL), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- As part of their role, the designated teacher will:
  - Work closely with the deputy DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
  - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## 13. Complaints and Concerns about School Safeguarding Policies

### 13.1 Complaints against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with the school's procedures for dealing with allegations of abuse made against staff (see *Appendix 4*).

### 13.2 Other Complaints

*Please refer to the Complaints Procedure for Schools which is available on the school website.*

The school also takes account of requirements related to complaints set out in the safeguarding and welfare section of the [Statutory Framework for the Early Years Foundation Stage](#) (*paragraph 3.75*).

### 13.3 Whistle-Blowing

*Please refer to the school's Whistle-Blowing Policy.*

The school takes account of the requirements set out in *paragraph 3.76* of the [Statutory Framework for the Early Years Foundation Stage](#).

## 14. Record-Keeping

The school will hold records in line with Information Records Management Service (IRMS) guidelines.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If a member of staff is in any doubt about whether to record something, they should discuss it with the DSL.

Non-confidential records will be easily 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.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection information is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **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.

All safeguarding concerns are recorded in writing on the school's Safeguarding Report Form (*Appendix 7*). Actions taken by the member of staff making the referral are recorded on the form as well as the actions undertaken by the DSLs.

Safeguarding Concern Forms and related information are held centrally and in a secure location within the school.

Emails and information shared with outside agencies are sent through a secure encrypted email system.

In addition:

- *Appendix 3* sets out the school's policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- *Appendix 4* sets out the school's policy on record-keeping with respect to allegations of abuse made against staff.

## 15. Training

### 15.1 All Staff

All staff members will undertake safeguarding and child protection training (including online safety) at induction, including whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers and students on placement will receive appropriate guidance as applicable.

### 15.2 The DSL and Deputy DSLs

The DSL and deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **15.3 Governors**

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

### **15.4 Recruitment – Interview Panels**

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

See *Appendix 3* for more information about the school's safer recruitment procedures.

### **15.5 Staff Who Have Contact with Pupils and Families (EYFS)**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **16. Monitoring Arrangements**

This policy will be reviewed **annually** by the Headteacher, DSL and governor responsible for safeguarding. At every review, it will be approved by the full Governing Board.

## **17. Links with other Policies**

This policy links to the following policies and procedures:

- Anti-Bullying
- Attendance
- Behaviour & Discipline
- Complaints Procedure for Schools
- Equality
- Health & Safety
- Privacy Notices
- Relationships & Sex Education (RSE)
- Special Educational Needs and/or Disability (SEND)
- Staff Code of Conduct
- Technology
- Whistle-Blowing

**Important School and Local Authority Contacts**

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Tina O'Sullivan	admin@larshrc.lbhf.sch.uk
Deputy DSLs	Jennifer McGinty Angela Cahill Alastair Ross	
Safer Organisations and Safeguarding in Education Manager	Megan Cameron-Brown	megan.cameron-brown@lbhf.gov.uk
Local Authority Designated Officer (LADO)	Megan Cameron-Brown (H&F LADO Manager)	LADO@LBHF.gov.uk
Chair of Governors	Elodie Brian	ebrian@larshrc.org
Channel helpline	LBHF Local Prevent Officer	prevent@lbhf.gov.uk 020 8753 5727

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

## **APPENDIX 2**

### **Types of Abuse**

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

**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.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**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/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)
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Safer Recruitment and DBS Checks – Policy and Procedures**

### **Recruitment and selection process**

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

The school has put the following steps in place during its recruitment and selection process to ensure it is committed to safeguarding and promoting the welfare of children.

#### **Advertising**

When advertising roles, the school will make clear:

- Its 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**

The school's 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, the school's Safeguarding and Child Protection Policy and the school's policy on the employment of ex-offenders.

#### **Shortlisting**

The school's 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 the school has shortlisted candidates, it 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.

The school will also consider carrying out an online search on shortlisted candidates 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**

The school 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, the school 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, the school 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, the school 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**

The school 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. The school will 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, the school will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). The school will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. The school will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed it 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. The school 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 checks 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.

The school will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where the school takes a decision that an individual falls outside of the scope of these regulations and does not carry out such checks, the school will retain a record of its assessment on the individual's personnel file. This will include the school's evaluation of any risks and control measures put in place, and any advice sought.

**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 the school 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.

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

- It believes the individual has engaged in [relevant conduct](#); or
- It believes 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
- It believes 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

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

## Contractors

The school 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.

The school will obtain the DBS check for self-employed contractors and will not keep copies of such checks for longer than 6 months.

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

The school will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, the school will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where it decides that an individual falls outside of the scope of these regulations and does not carry out such checks, the school will retain a record of its assessment. This will include the school's evaluation of any risks and control measures put in place, and any advice sought.

## **Trainee/Student Teachers**

Where applicants for initial teacher training are salaried by the school, it will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, the school 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.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

The school 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
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. The school will retain a record of this risk assessment.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where the school decides that an individual falls outside of the scope of these regulations and it does not carry out such checks, the school will retain a record of its assessment. This will include the school's evaluation of any risks and control measures put in place, and any advice sought.

## **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

## **Staff working in Alternative Provision Settings**

Where the school places a pupil with an alternative provision provider, it will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that the school would otherwise perform.

### Allegations of Abuse made Against Staff

#### Section 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 he or she 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 the school is in any doubt as to whether a concern meets the harm threshold, it will consult the Local Authority Designated Officer (LADO).

The school 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.

The school's 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, the school will only suspend an individual if it has considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, the school 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
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If in doubt, the case manager will seek views from the school's human resources officer and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

#### 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 case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- 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)
- 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
- 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
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **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
- **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
- **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
- 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 considering what other support is appropriate.
- 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/carers of the requirement to maintain confidentiality about any allegations made against teachers (where

this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents/carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- 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.

The school will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, it will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school 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.

### **Additional Considerations for Supply Teachers and all Contracted Staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, the school will take the actions below in addition to its standard procedures.

- The school will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Governing Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- The school will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- The school will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (it will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, the school will inform them of its process for managing allegations, and keep them updated about school policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

The school will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **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 school will 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 school will consider whether to refer the matter to the Teaching Regulation Agency 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, Unfounded, False or Malicious Reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Unsubstantiated, Unfounded, False or Malicious Allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Confidentiality and Information Sharing**

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 LADO, 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/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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, the school will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the enquiry.

## References

When providing employer references, the school will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions.

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that the school can make to its 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. The school will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-Recent Allegations

Abuse can be reported, no matter how long ago it happened.

The school will report any non-recent allegations made by a child to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, the school will advise the individual to report the allegation to the police.

## Section 2: 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/carer or other adult within or outside the school
- Pre-employment vetting checks

The school recognises 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**

The school recognises 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.

The school 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 7.9 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.

### **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. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

## **Record Keeping**

All low-level concerns will be recorded in writing. 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, the school will 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 as described in section 1 of this appendix, it will be referred 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, the school will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

The school 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.



## 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.

There are many circumstances where a child may become missing 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
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families.

The school will follow its procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the LA 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 missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, the school will follow local child protection procedures, including with respect to making reasonable enquiries. The school will make an immediate referral to the LA Family Services, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

See Hammersmith & Fulham ACE\* Reference Manual, *Section 2 Children Missing from Education* <https://www.lbhf.gov.uk/children-and-young-people/education-support-services/ace/ace-reference-manual>

\* ACE stands for the attendance (statutory), child employment & entertainment, elective home education and children missing education team.

### Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into 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 abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to LA Family Services and the police, if appropriate.

## **Child-on-Child Abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

The school has a zero-tolerance approach to sexual violence and sexual harassment. It recognises that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.9 and 7.10 set out more detail about the school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, the school will consider their ages and stages of development. It recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

## **Domestic Abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Family Services.

## **So-called ‘Honour-Based’ Abuse (including FGM and Forced Marriage)**

So-called ‘honour-based’ violence (**HBV**) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **Female Genital Mutilation**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by Female Genital Mutilation (FGM) 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 Family 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
  - Being repeatedly absent from school, or absent for a prolonged period
  - 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 Family Services 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/carers 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 previously listed 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 into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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 LS's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmv@fco.gov.uk](mailto:fmv@fco.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 extremist ideologies associated with terrorist groups
- **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. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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.

The school 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 partners and local police force.

The school will ensure that suitable internet filtering is in place, and equip 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 alert 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.

Staff should **always** take action if they are worried.

## **Sexual Violence and Sexual Harassment between Children in Schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEND, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.9 and 7.10 set out more detail about the school's approach to this type of abuse.

## **Serious Violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.



## Checking the Identity and Suitability of Visitors

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

If the visitor is unknown to the setting, the school will check their credentials and reason for visiting before allowing them to enter the main building. Visitors should be ready to produce identification.

Visitors are expected to sign in on the digital system and to wear a visitor's sticker.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or Educational Psychology Service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, the school will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. The school 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.

## Non-Collection of Children

If a child is not collected at the end of the session/day, the school will:

- Telephone the named contacts listed on the child's Emergency Contact Form (three contacts are held on file for all pupils).
- Arrange for the child to be supervised at the main office area by a member of school staff until the child is collected.
- Make an entry in the Late Book to record the date, time of collection and reason for late collection. This will be signed by the person collecting the child.
- Contact Family Services if it is not possible to reach any of the child's listed emergency contacts by 5.00pm (if at the end of the school day or an after-school club session). This decision will be made by the Headteacher, DSL or deputy DSL, or in their absence a member of the leadership team.

## Missing Pupils

The school's 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, the school will:

- Follow the procedures outlined in its Attendance Policy regarding first day of absence follow up.
- Contact Family Services if it has not been able to make direct contact with the child's parents/carers (after repeatedly trying to contact the family via the named persons on the child's Emergency Contact Form).

Also see Hammersmith & Fulham ACE\* Reference Manual <https://www.lbhf.gov.uk/children-and-young-people/education-support-services/ace/ace-reference-manual>:

- *Section 1: Supporting School Attendance - Children Missing Education (CME) "Reasonable Enquiries" Checklist*  
[https://www.lbhf.gov.uk/sites/default/files/section\\_attachments/1.8.ace\\_cme\\_reasonable\\_enquiries\\_checklist.pdf](https://www.lbhf.gov.uk/sites/default/files/section_attachments/1.8.ace_cme_reasonable_enquiries_checklist.pdf)
- *See Section 2: Children Missing Education (CME)*



## SAFEGUARDING 'STUDENTS AND VOLUNTEERS' CODE OF CONDUCT

### GUIDELINES FOR SAFE PRACTICE

- Know the school's child protection arrangements and named Designated Safeguarding Leads (DSL): Lead DSL **Tina O'Sullivan** (SENCo) and Deputy DSLs **Jennifer McGinty** (Headteacher), **Angela Cahill** (Deputy Headteacher) and **Alastair Ross** (Computing and IT Lead).
- Gifts to individual children should be part of an agreed reward system; other gifts should be of insignificant value and given equally. Do not single a child out for special treatment. Do not accept gifts regularly or ones of significant value; declare any which may be misconstrued
- Maintain professional boundaries. Do not give out your address, home/mobile phone number or email address unless agreed with Senior Leaders and parents. Do not send pupils text messages and follow internal guidance about mobile phone/Internet/email use. Do not socialise with pupils or take them to your home.
- Report any concerns that a pupil has developed a crush on a member of staff/student/volunteer. If a child touches you inappropriately, record and report it to one of the named DSLs. It may be innocent, but could indicate a problem that needs to be explored. Avoid clothing which could give the wrong messages.
- Physical contact should be needs led, age and gender appropriate. Involve another member of staff where contact may be misinterpreted. Avoid conduct which could be misinterpreted e.g. horseplay, tickling or fun fights. Avoid children sitting on your lap.
- Where physical contact is necessary to demonstrate the use of an instrument or equipment e.g. PE, games and tuition, ensure that this is within appropriate boundaries.
- Do not do anything personal for a child that they can do for themselves. If bathing or changing a child with special needs, try to have another person present. Follow the agreed care plan for children requiring intimate care on a regular basis. Supervising children showering or changing should be age and gender appropriate and sensitive to potential embarrassment.
- Record and report incidents involving a child, including injuries, according to relevant procedures, e.g. Safeguarding & Child Protection, Physical Intervention, Health and Safety.
- Do not make, or encourage others to make, comments which are sarcastic, demeaning or insensitive, or humiliating, or might be interpreted as such.
- Avoid meetings with pupils in secluded areas. Ensure visual access and/or open door in a 1 to 1 situation and avoid 'engaged' signs. Avoid being alone with a pupil in transport.
- Plan and agree arrangements for out of school activities in advance, e.g. overnight stays and adult/pupil ratio. Follow Health and Safety rules.
- Adhere to the school's policy on Relationships and Sex Education, and the Relationships and Health Education programme and the wishes of parents/carers. Ensure materials used relate to planned learning outcomes and cannot be misinterpreted.
- Only use photography etc. as appropriate to a school lesson or activity and ensure a senior member of staff is aware. Avoid 1 to 1 sessions. Personal devices (i.e. mobile phones, iPads or similar) must not be used under any circumstances to take or store pictures or recordings. Be clear about the use and disposal of digital images, in line with school policy. Be sensitive to children who appear uncomfortable being photographed. Recognise potential for misinterpretation. Ensure all images are available for scrutiny. Do not take, display or distribute images without consent.
- Report any concerns about a member of staffs' behaviour and/or attitude toward children to the Headteacher.

**I have read the Safeguarding 'Students and Volunteers' Code of Conduct and I agree to follow the guidelines.**

Name: ..... *(please print)*

Signed: ..... Date: .....

## LARMENIER & SACRED HEART CATHOLIC PRIMARY SCHOOL

### Safeguarding Concern Form

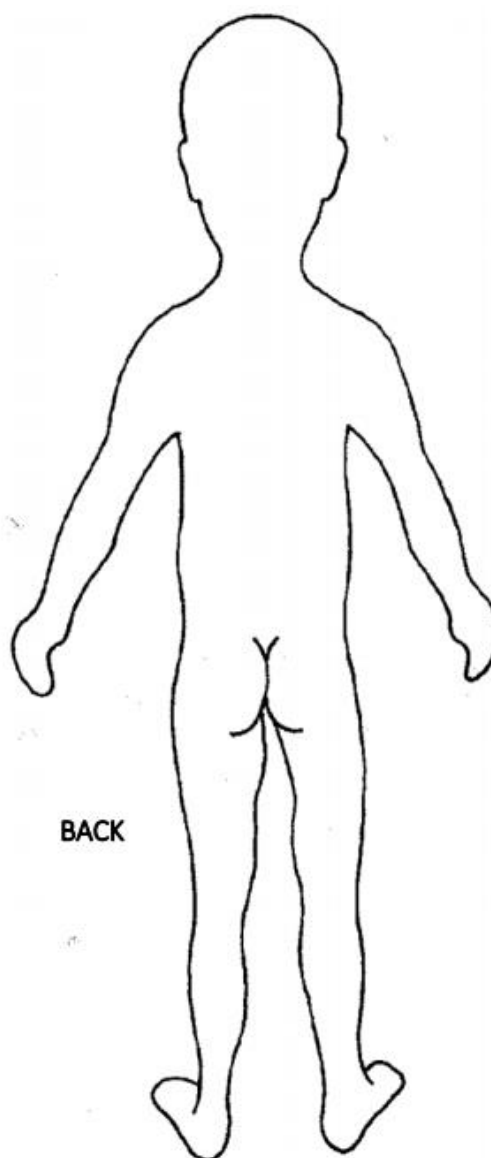
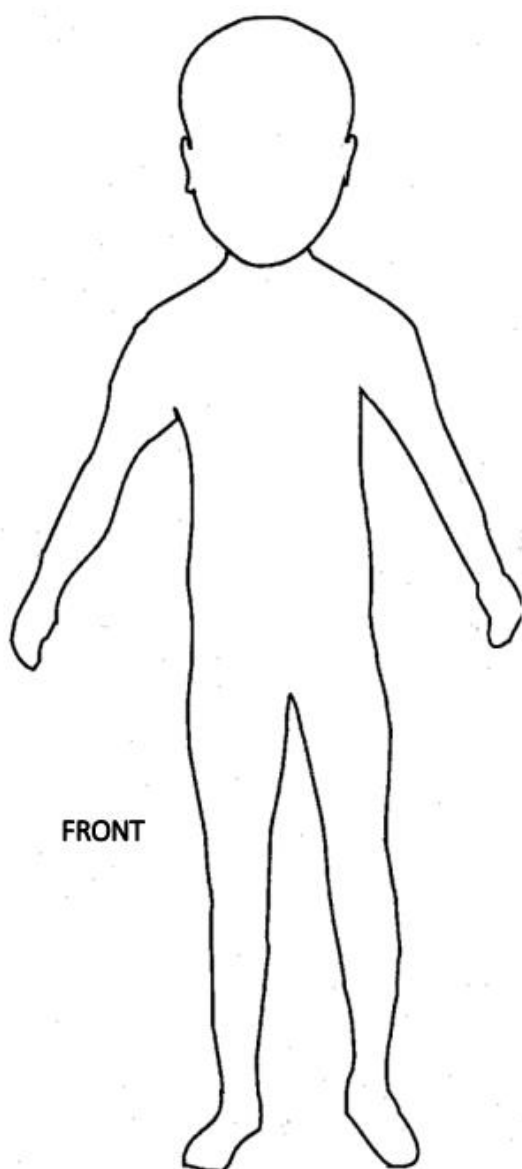
<b>Name:</b>	<b>Class:</b>	<b>Teacher:</b>
<b>Date of Incident/Issue/Concern:</b>	<b>Pupil's DOB:</b>	<b>Reported by:</b>
<b>Details of Incident/Issue/Concern:</b>		
<b>Action taken by Member of Staff/Individual making the Referral:</b>		

Action taken by DSL and/or deputy DSL:

Please tick and date:

- Reported to Designated Safeguarding Lead (DSL)
- Reported to a deputy Designated Safeguarding Lead
- Reported to Headteacher
- Referral to Family Services                      yes / no (to monitor)

Signed .....



# **What to do if a Child Approaches you to Discuss Allegations of Abuse**

Any member of staff may be approached by a child who needs to talk about something in confidence. Or a child may make a casual disclosure to an adult which raises concern. Here are the procedures to follow when this occurs.

What to do:	What not to do:
<p>Stay calm.</p> <p>Listen, hear and believe.</p> <p>Only ask Who? What? Where? When?</p> <p>Give time to the child to say what they want.</p> <p>Reassure and explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed.</p> <p>Act immediately in accordance with the procedure in the Safeguarding &amp; Child Protection Policy. Inform the Designated Safeguarding Lead (DSL) or deputy DSL.</p> <p>Record accurately in writing as soon as possible what was said and without personal comment. Do this when the child is not present in front of you.</p> <p>Note the date, adult to whom the child approached – teaching assistant, learning support assistant, teacher or other - the location and the time when the disclosure was made.</p> <p>Report to the DSL or deputy only.</p>	<p>Do not panic. Do not over react. It is unlikely that the child is in immediate danger.</p> <p>Listen carefully; do not probe for more information. Avoid leading questions. Questioning the child may affect how the disclosure is received later on.</p> <p>Do not make assumptions. Do not paraphrase or offer alternative explanations or suggestions.</p> <p>Do not promise confidentiality to keep secrets or that everything will be OK (it might not).</p> <p>Do not try to deal with it yourself</p> <p>Do not make negative comments about the alleged abuser. Do not make personal observations.</p> <p>Do not make a child repeat a story unnecessarily.</p> <p>Do not discuss the concern with colleagues or what has been said to you. This report is confidential and will only be shared with the DSL, the Headteacher and other professionals if necessary.</p>

It is the duty of all staff at Larmenier & Sacred Heart Catholic Primary School to report any suspicions or disclosures of abuse. This includes all teachers and support staff, supply staff, peripatetic music teachers, student teachers and volunteers. It is not for the individual adult to decide whether or not a suspicion or allegation is true. All must be taken seriously and dealt with according to the policy and procedures laid down by the school.