



# Child protection and safeguarding policy (including safer recruitment, allegations against staff and low-level concerns)

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#### **Important contacts**

<b>ROLE/ORGANISATION</b>	<b>NAME CONTACT DETAILS</b>
Designated safeguarding lead (DSL)	Katie Vivyan 020 3130 6430
Deputy DSL	Nicola Collett-White 020 3130 6430
Local authority designated officer (LADO)	Eva Simcock 020 7525 0689 <a href="mailto:Eva.Simcock@southwark.gov.uk">Eva.Simcock@southwark.gov.uk</a> Duty telephone number for enquiries/referrals: 020 7525 3297
Chair of governors	Chris Fishlock 07782315549 12 Merrick Square, SE1 4JB
Channel helpline	020 7340 7264

#### **1. Statement of policy intent**

London Christian School is committed to providing a safe and secure environment for students, staff and visitors and promoting a climate where pupils and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. The school will safeguard and promote the welfare of children by protecting them from maltreatment, whether that is within or outside the house, including online; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes, providing help and support to meet the needs of children as soon as problems emerge, promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children and taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework .

This policy aims to

- Ensure that appropriate action is taken in a timely manner to safeguard and promote children’s welfare
- Ensure that all staff are aware of their statutory responsibilities with respect to safeguarding
- Ensure that staff are properly trained in recognizing and reporting safeguarding issues
- Identify the names of responsible persons in the school and explain the purpose of their role
- Outline the role of the governing body
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed “vulnerable”
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the Governors and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children: Anti-Bullying policy, Attendance policy, Behaviour policy, Intimate care and toileting policy, Online safety policy, Physical Intervention and restraint policy and Staff recruitment policy. The Staff Code of Conduct contains requirements which have a significant bearing on safeguarding and all staff are expected to read and adhere to this.

## **2. Legislation and statutory guidance**

This policy is applicable to the whole school, including the EYFS setting and all on and off-site activities undertaken by pupils whilst they are the responsibility of the school.

This policy is based on the Department for Education’s (DfE’s) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy also draws upon duties based on the following legislation:

- Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership ([LSCP](#)) and the Southwark Safeguarding Children Partnership ([SSCP](#))
- Section 175 of the [Education Act 2002](#) (as amended), 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
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [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 our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’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 we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- 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](#).
- Due regard is also given to the advice contained in the DfE’s [“What to do if you’re worried a child is being abused 2015”](#), [“Mental Health and Behaviour in Schools 2018”](#) and [“Information sharing – Advice for practitioners”](#).

### 3. Definitions

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

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

**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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including

where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children. Appendix 1 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 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education 2024 (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

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

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

#### 4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions(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 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
- Have a family member in prison or affected by parental offending
- 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 promoting the welfare of children in our school is **everyone's** responsibility. This policy applies to all staff, supply staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

- Behaviour policy
- Pastoral support system
- 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 FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 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 (Staff safeguarding summary sheet)
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask 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 LGBTQ+ to speak out and share their concerns

#### All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy (DDSL), the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- How multiple safeguarding issues will overlap with one another and to be vigilant around this
  - The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
  - The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being

at risk from or involved with serious violent crime, FGM radicalisation and serious violence (including that linked to county lines)

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Section 13 and appendix 4 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 senior leadership team. Our DSL is **Katie Vivyan**, Deputy Head. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL (or a deputy) will always be available during school hours for staff in the school to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

If necessary, the DSL and DDSL can be contacted during out of school hours via mobile telephone and all staff have contact details.

When the DSL is absent, the DDSL – **Nicola Collett-White**, Head teacher – will act as cover.

If the DSL and DDSL are off site during school hours, a member of SMT will be placed in charge and the DSL will be contactable by mobile phone in the case of any safeguarding issues. If in exceptional circumstances, the DSL/DDSL are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior management team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

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 in need, at risk of significant harm and those who may benefit from Early Help assessments.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, 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:

- The DSL will also keep the head teacher informed of any issues and 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 DDSL are set out in their job description.

### **5.3 The governing board**

The Governing Body will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. The Governing Body will also ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated. The Governing Body is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at Human Rights | Equality and Human Rights Commission and Equality Act 2010: advice for schools.

The Governing Body is also aware of duties placed by the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure. We note the ICO guidance 'For Organisations' which includes information about our obligations and how to comply, including protecting personal information, and providing access to official information.

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

The Governing Body also notes the DfE Data Protection guidance for schools, which will help school staff and governors understand how to comply with data protection law, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Our governors recognise that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

Our governors will do all that they reasonably can to limit children's exposure to the risks from the school's IT system. As part of this process, our governing body will ensure that the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Our governing body will consider the age range of our children, the number of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

In accordance with the DfE's [filtering and monitoring standards](#), the Governing Body have assigned a senior leader (Katie Vivyan) and a Governor (Mike Burden) to ensure that these standards are being met. We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.



The Governing Body will ensure that the school contributes to inter-agency working in accordance with statutory guidance "[Working Together to Safeguard Children](#)" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership (SSCP).

The Governing Body has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated governor or the headteacher.

The Governing Body has nominated Andrea McCallister as a lead to take leadership responsibility for the school's safeguarding arrangements. Concerns about and allegations of abuse made against the headteacher will be referred to the chair of governors who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the headteacher. As a good practice, the headteacher will provide a termly report to the Governing Body outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name. Also as a good practice, the nominated governor will meet on a regular basis with the DSL to monitor the school's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school is meeting its duties in respect of safeguarding.

All governors will read Keeping Children Safe in Education Part 1 and 2 and Annex B.

#### **5.4 The head teacher**

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

- Ensuring that staff (including temporary staff) and volunteers:
  - are informed of our systems which support safeguarding, including this policy, as part of their induction
  - understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has 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 (including online safety) and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- 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
- Making sure each child in the Early Years Foundation Stage is assigned a key person (a named member of staff with responsibilities for a small group of children who helps those children in the group feel safe and cared for)
- Overseeing the safe use of technology, mobile phones and cameras in the EYFS setting

#### **Confidentiality**

If the DSL and DDSL are off site during school hours, a member of SMT will be placed in charge and the DSL will be contactable by mobile phone in the case of any safeguarding issues. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

You should note 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 GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff 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
- Staff 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 [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

## **7. Recognising abuse and taking action**

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the DSL and DDSLs will be considering the context within which such incidents and/or behaviours occur. This is known as [Contextual Safeguarding](#), which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

We note that Southwark's Multi Agency Safeguarding Hub ( [MASH](#) ) adopted the London Safeguarding Children Partnership (LSCP) [Threshold Document](#) , which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support. We also note the LSCP's [The Continuum of Need Matrix](#) , which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the children's needs and making referrals to Southwark MASH.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Safeguarding referrals should be made to Southwark Multi Agency Safeguarding Hub (MASH) via an [Online Web Referral](#) Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the Duty Desk on **020 7525 1921**, to ensure that making a referral is an appropriate action.

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral. Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the referrer and a social work qualified practice supervisor or manager should decide next steps and the type of response required. We will follow up if this information is not forthcoming. If, after a referral, the child's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

### 7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

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

- 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 you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

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

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

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police via the 101 number, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

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

If a child under the age of 18 has had FGM, or if you have good reason to suspect they are at risk of FGM (having considered their family history or other relevant factors), they must be referred using standard existing safeguarding procedures, as is the procedure with all other instances of child abuse.

Further information on this duty can be found in the document “[Mandatory Reporting of Female Genital Mutilation – procedural information](#)”. A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

### 7.4 If you have 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 below illustrates the procedure to follow if you have any concerns about a child’s welfare. Where possible, 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. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

## Early help assessment

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention. Our staff will be alert to the potential need for early help for a child who is disabled; has special educational needs (whether or not they have a statutory education; health and care (EHC) plan); is a young carer; is bereaved; is showing signs of being drawn into antisocial or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime; is frequently missing/goes missing from care or from home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised; is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online; is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing drugs or alcohol themselves; is suffering from mental ill health; has returned home to their family from care; is a privately fostered child; has a parent or carer in custody; is missing education, or persistently absent from school, or not in receipt of full time education; has experienced multiple suspensions and is at risk of, or has been permanently excluded.

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.

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

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. [Southwark's Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. Referrals should be made to Southwark Multi Agency Safeguarding Hub (MASH) via the [online referral form](#)). Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the Duty Desk on 020 7525 1921, to ensure that making a referral is an appropriate action.

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

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Duty Desk, the Deputy Designated Safeguarding Lead, the LA's Strategic Lead Officer for education services or the Early Help Service (EHS) Duty Manager.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

In the event of illegal physical chastisement, we will always report for investigation.

All parents applying for places at this school will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

London Christian School recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks.

### **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible 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. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

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

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

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

### **7.6 If you have a concern about 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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

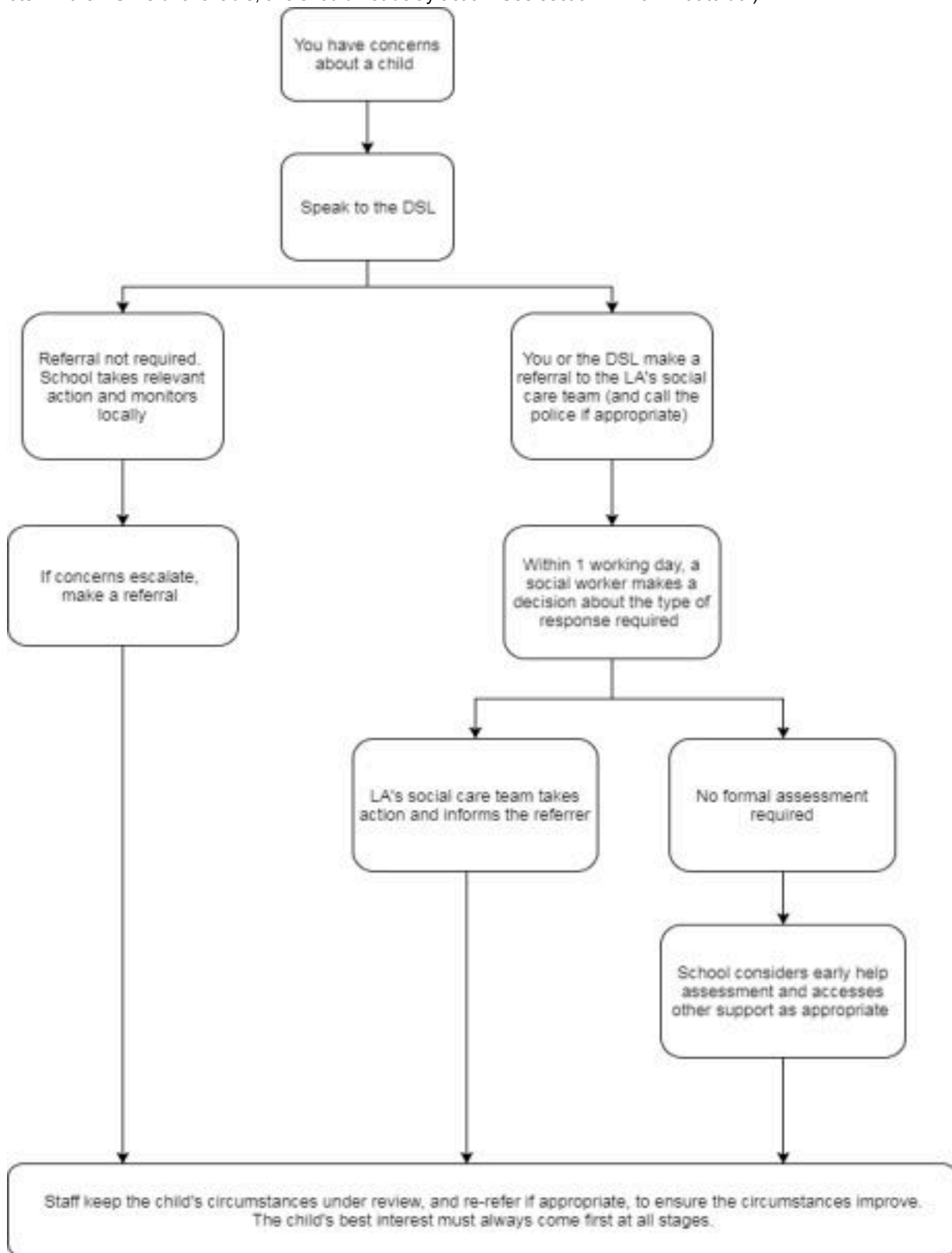
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

A helpful document to refer to is the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

**Figure 1: procedure if you have 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 Concerns about a staff member, supply teacher, volunteer or contractor

If you have 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 head teacher as soon as possible. If the concerns/allegations are about the head teacher, speak to the Chair of Governors, Chris Fishlock.

The head teacher/proprietor will then follow the procedures set out in [Appendix 3](#), if appropriate.

If staff have concerns or an allegation is made about another staff member and there is a conflict of interest in reporting to the headteacher, this should be directly reported to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

## 7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. This can happen both inside and outside of school and online and take different forms.

Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

The school has a strong commitment to an anti-bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school’s behaviour policy but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol

-involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix 4 for more information about child-on-child abuse.

### Procedures for dealing with allegations of child-on-child abuse

In the event of a disclosure about child on child abuse all children involved, whether victim or perpetrator, are treated as being ‘at risk’. Procedures are in place to minimise the risk of child on child abuse and how allegations on child on child abuse are recorded, investigated and dealt with as well as how victims and perpetrators of child on child abuse are supported, are set out in the *Anti-Bullying Policy*.

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team 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
- 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. We will ask the police if we have any questions about the investigation.

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

As a school, we recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confidence in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour, including requesting or sending sexual images
- Provide a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe
- Be 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
- Have systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued e.g. worry boxes, regular reminders from staff to talk if concerned
- Ensure staff reassure victims that they are being taken seriously
- Be 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
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure 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). We 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 our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a

case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing
- We also note the DfE’s advice and guidance on [Preventing and Tackling Bullying](#).

### **7.9 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

This is a suggested approach based on guidance from the [UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

#### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

#### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to

special educational needs) ● What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent ● The imagery involves sexual acts and any pupil in the imagery is under 13 ● The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the head teacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

#### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

#### **Informing parents**

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

#### **Referring to the police**

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

#### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording these incidents.

#### **Curriculum coverage**

We will ensure that children are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum.

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
  - Specific requests or pressure to provide (or forward) such images
  - The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **7.10 Curriculum**

London Christian School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. We will ensure that children are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum. It is expected that all curriculum coordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. As part of

developing a healthy, safer lifestyle, pupils will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help;
- to judge what kinds of physical contact are acceptable and unacceptable
- to be aware of sexual harassment, online abuse, sexual violence and issues of consent and safeguarding risks, including online risks and what constitutes a healthy relationship, both offline and online via a carefully planned relationships, sex and health education curriculum;
- to use assertiveness techniques to resist unhelpful pressure;
- emotional literacy.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in line with our Online Safety Policy. We will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

### **8. Notifying parents**

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children’s social care to make sure our approach to information sharing is consistent.

### **9. Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with 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 condition without further exploration

-pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

-the potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

-communication barriers and difficulties in managing or reporting these challenges

Any abuse involving pupils with SEND will require close liaison with the DSL (and DDSL) and the SENCO.

Further information can be found in the [DfE’s SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

### **10. Pupils with a social worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise 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, behavior and mental health.

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



## 11. Looked after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we 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

We note the DfE's statutory guidance [Designated teacher for looked-after and previously looked-after children](#)

In the case of a looked-after or previously looked-after child attending our school, we will appoint an appropriately trained teacher to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the 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

## 12. Online Safety and the use of mobile technology

We recognise that it is essential that children are safeguarded from potentially harmful and inappropriate online material.

To address this, our school aims to:

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

### The 4 key categories of risk

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

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

**To meet our aims and address the risks above, we will:**

- Educate pupils about online safety as part of our curriculum. Online safety is taught to all ages through the Computing curriculum with reference to the DfE guidance from 'Teaching Online Safety in Schools' (June 2019) and the UK Council for Internet Safety 'Education for a Connected World' framework (June 2018). For example:
  - o The safe use of social media, the internet and technology
  - o Keeping personal information private

- o How to recognise unacceptable behaviour online
- o How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - o Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - o Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. They should be switched off or silent at all times.
  - o Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- We will be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding

Children must hand all devices such as mobile phones and tablets into the office at the start of the day and collect them as they are leaving at the end of the day. Please see the [Online Safety Policy](#) for more information.

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

Staff will be issued with a school phone or other digital device where contact with parents or carers is required or photos are to be taken for professional purposes, for instance for off-site activities (e.g. school trips).

Staff are allowed to use their personally owned mobile devices for remote working outside the school setting, for example lesson preparation, however they must adhere to the [Online Safety Policy](#).

When accessing school approved accounts apps (ie: Purplemash, Integris and Google Drive), staff will not download anything onto their own digital device e.g. photos or videos of children.

In an emergency (such as a lock down) where a staff member does not have access to a school-owned device, they should use their own device and hide their own mobile number for confidentiality purposes and then report the incident to the Head Teacher and the Online Safety Coordinator.

## Parent owned digital devices

No parent is permitted to use their mobile phone or other device whilst inside the school building except (in the case of school productions or events) to take photos/video footage of their own child. If another child or children is/are in the same photo/video, and permission has been obtained from the parent/s of the other child/children, such photos/videos can be shared on WhatsApp only. Such permission is obtained in accordance with the ***Online Safety Policy***.

The school's policy for the use of mobile phones and other devices is fully set out in the ***Online Safety Policy***.

## 13. Complaints and concerns about school safeguarding policies

### 13.1 Allegations made against/concerns raised in relation to staff

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

### 13.2 Other complaints

Details of how LCS handles complaints of other types, for example, those relating to pupils or premises, are covered in the ***Complaints Policy and Procedure***.

### 13.3 Whistle-blowing

If a member of staff does not feel able to raise concerns regarding child protection failures internally they can call the NSPCC Whistleblowing Helpline on 0800 028 0285, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Should a staff member have genuine concerns about the wellbeing and safety of a pupil or member of staff or about any poor or unsafe practice, the procedure in the ***Staff Whistleblowing, Grievance and Disciplinary Policy and Procedure*** outlines the course of action that should be taken and the anticipated response of the school. If the concern is an allegation of abuse made against staff, please see the procedure outlined in appendix 3.

## 14. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Concerns will be logged by staff using 'My Concern' and will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome (whether referrals were made or not to other agencies)
- The DSL will record discussions and decisions made including the rationale for those decisions

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

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. The retention period for registers is three years.

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 file is forwarded promptly and securely, and separately from the main pupil file. 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. If a new child arrives from another school, the DSL will contact the sending school to ensure important information is passed on.

Where a pupil is placed in alternative provision, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.



Low level student behaviour observations will be noted by the classroom teacher on 'Integris'. Any concerns (as discussed with the Head Teacher) will be noted in the 'Record of Bullying Incidents and Concerns Book' that is kept in a secure place in the Head Teacher's office. This information may be shared directly with other agencies as appropriate.

All contact with parents and external agencies will be logged and these will be kept as CP records. The school will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the DSL or DDSL.

When we receive child protection records from other schools, we will ensure key staff such as the DSL and SENCO are aware as required.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and a confirmation of receipt will be obtained.

If a pupil is withdrawn from the school having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the school to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service either through the [School's Single Point of Contact \(SPOC\)](#) or the Family EHS Duty Manager in order that they might make further enquiries. If this school receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from the School's Admissions Register in accordance with the [DfE guidance Working together to improve school attendance](#).**

We will inform the Local Authority when we are about to add or delete a pupil's name from the school admission register for any reason in line with Southwark's [Children Missing Education \(CME\) Protocol](#).

When a pupil ceases to be registered at this school and becomes a registered pupil at another school in England or Wales, we will send a Common Transfer File (CTF) to the new school via DfE's secure internet system called [school2school](#).

When a pupil transfers from our school and we do not know to which school they have gone, we will generate CTF for each pupil using XXXXXX for school number to indicate the destination is unknown, as per paragraph 2.4.2 of the [CTF 24 specification](#). Given that schools cannot search the "lost pupils database", if a pupil arrives in our school and we do not know the previous school, we will contact the LA's Education Data Manager Natasha Sharmah (Natasha.Sharmah@southwark.gov.uk , 020 7525 2914), who will be able to search the database for a matching record using gender, names or former names and date of birth and forward it to our school.

The school will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. We will hold more than one emergency contact number for each pupil or student to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our 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 at induction, including on whistle-blowing procedures and online safety, 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 in line with advice from the 3 safeguarding partners.

Whole-school training will be delivered on August 29th 2024 and regular staff refreshers will be delivered through staff meetings and TA training.

All newly recruited staff (teaching and non-teaching, temporary or permanent and supply) will be appraised of this policy and will attend induction training that covers the school's Safeguarding Policy, SMSC Policy, the Staff Code of Conduct, Acceptable User Policy, Online Safety Policy, the Behaviour Policy, the identity of the Designated Safeguarding Lead and Part One and Annex B of Keeping Children Safe in Education, which all will be required to read and sign to say they have understood. They will also be given access to school policies and procedures on the school's shared drive.

All governors and new staff (teaching and non-teaching, temporary or permanent) will complete the online Southwark course, 'Safeguarding Children and Adults at Risk'.

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 complete the *HM Government Prevent Online training*.

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, to provide them with relevant skills and knowledge to safeguard children effectively.

Volunteers will receive appropriate training, if applicable.

### **15.2 The DSL and DDSL**

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

The DSL safeguarding refresher training took place on 07.12.2022 and the DDSL's safeguarding refresher training took place on 03.03.2023.

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).

Designated staff will be encouraged to attend appropriate network meetings and to participate in the multi-agency training programme organised by the Southwark Safeguarding Children Partnership (SSCP). Regular contact will be made with the LA's Safeguarding Coordinator to determine the appropriate schedule, level and focus for staff safeguarding training. They will also complete Prevent training.

DSL and DDSL meet every week to discuss safeguarding and detailed minutes are kept.

### **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

Governors will be apprised of this policy and the lead safeguarding governor will be required to attend relevant LA or Southwark Safeguarding Children Partnership (SSCP) training. 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 head teacher, 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 Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Please see Appendix 2 for detailed policy on Recruitment.

## 16. Monitoring arrangements

The governing body will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- the quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting
- the timeliness of response to any safeguarding concerns that are raised
- the quality of work to support multi-agency plans around the child.

This policy will be reviewed **annually** by Katie Vivyan (DSL, Deputy Head) and Nicola Collett-White (DDSL, Head teacher). 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
- Behaviour
- Staff code of conduct
- Children Missing Education
- Complaints
- Intimate Care and Toileting Policy
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- Physical Intervention and Restraint
- First aid
- Curriculum
- Recruitment
- Staff Whistleblowing, Grievance and Disciplinary

Policy approved by the Governing Board: August 2024

Review date: January 2025

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

## **Appendix 1: types of abuse**

Abuse, including neglect, exploitation, 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 or 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 or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## **Appendix 2: safer recruitment and DBS checks – policy and procedures**

This section of the policy should be read in conjunction with the **Recruitment Policy**.

London Christian School is committed to the principles of safer recruitment and, as part of that, adopt recruitment procedures that help deter, reject and/or identify people who might abuse children.

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

Safe recruitment processes are followed and all staff recruited will be subject to the appropriate checks and procedures set out in the **Recruitment Policy** (which complies with the DfE's 'Keeping Children Safe in Education') which includes checks of identity, a medical fitness declaration, qualification and right to work in the UK. At least two references will be taken up, including a request for any reason why the applicant should not be employed to work with children. Any gaps in employment history or discrepancies will be checked against references and will be taken up with the candidate. If a reference is taken over the telephone, detailed notes will be taken, dated and signed. Appropriate criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition from teaching checks will also be undertaken. The Department for Education's Secure Access Service is used to check that any new member of staff recruited as a teacher is not subject to a prohibition order issued by the Secretary of State. The Secure Access Service may be used for newly recruited teaching assistants, at the discretion of the school.

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

Due regard will also be given to the DfE's statutory guidance for schools about employment of staff disqualified from childcare ("Disqualification under the Childcare Act 2006").

All new staff will therefore be asked to complete a Staff Disqualification Declaration Form in line with KCSIE guidelines and legislation affecting those who may be disqualified from working with children. All new staff, specialist teachers and volunteers in regulated activity will be added to the Single Central Record of Appointments. Copies of identity documents, right to work and qualifications (if applicable) will be retained and kept in staff files in a secure cabinet.

Current staff are required to sign a safeguarding summary sheet each year outlining their safeguarding responsibilities. This includes that they are aware of their duty under the "Disqualification under the Childcare Act 2006" to report any changes in their circumstances which may affect their employment.

Records for those no longer employed or volunteering will be kept for seven years after the person has left LCS in case any legal process requires them.

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

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

### **Shortlisting**

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

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

We 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**

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

When seeking references we will:

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

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

When appointing new staff, we will:

- Verify their identity (best practice is to check their name on their passport)
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
  - 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). We will not keep a copy of this for longer than 6 months
  - Verify their mental and physical fitness to carry out their work responsibilities
  - Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
  - Verify their professional qualifications, as appropriate
  - Ensure they are not subject to a prohibition order if they are employed to be a teacher or teaching assistant
  - Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including police clearance from the individual country that the person had lived in. Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

**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**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

where: ● We believe the individual has engaged in relevant conduct; or

- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- 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**

LCS will only use employment agencies which can demonstrate that they positively vet their supply staff. Prior to a new member of supply staff starting at the school, the agency will be asked to provide a letter confirming that the DBS check has been completed and thorough vetting procedures have been followed for that individual: identity, enhanced disclosure, right to work in the UK, barred list, prohibition, qualifications, references, medical history and previous employment history check. Supply staff will be added to the Single Central Record of Appointments.

The identity of all supply staff will be checked upon arrival on their first day at the school. The school will report the misconduct of temporary or agency staff to the agency concerned and to the LA.

Supply staff joining the school on a permanent or temporary basis will be asked to read the LCS Safeguarding Policy, KCSIE Part One and Annex B, and will be given access to all the LCS policies on the server if needed. Additionally, they will be inducted on school safeguarding procedures. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **Contractors**

Contractors who are engaged by or on behalf of the school to undertake works on site will be made aware of the Safeguarding Policy and be asked to read the 'Guidance for visitors to LCS' document.

LCS will only use contractors which can demonstrate that they positively vet their staff. Prior to a new regularly employed contractor starting at the school, the agency/company will be asked to provide a letter confirming that the DBS check has been completed and thorough vetting procedures have been followed for that individual: identity, enhanced disclosure, right to work in the UK, barred list, prohibition, qualifications, references, medical history and previous employment history check.

DBS checks on long-term contractors who work regularly in school during term time will be undertaken when individual risk assessments by the DSL deem this to be appropriate.

During major works, when large numbers of workers and subcontractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions.

All contractors and subcontractors working within school hours will wear a visitor badge and be issued with copies of the 'Guidance for visitors to LCS' document.

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

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

Individuals and organisations that are contracted by the school to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.

Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision depending on the circumstances. If an individual working at our school is self-employed, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

## **Trainee/student teachers**

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

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

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

## **Volunteers**

Volunteers will be subject to the same code of conduct as paid employees of the school. Volunteers will wear a school visitor badge whilst on the premises.

Voluntary sector groups that operate within this school or provide off-site services for our pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Partnership (SSCP). Premises lettings and loans are subject to acceptance of this requirement. Where services or activities are provided separately by another body we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise without



school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to a termination of the agreement.

### **Supervised Volunteers**

A supervised volunteer is a person engaged by the school to work in a voluntary capacity with pupils on an irregular basis (no more than once a month). They will wear a visitor badge and be made aware that all staff, volunteers and visitors are expected to adhere to the Safeguarding Policy. They will be supervised by an accompanying member of staff at all times.

### **Unsupervised Volunteers**

An unsupervised volunteer is a person engaged by the school to work in a voluntary capacity with pupils on a regular basis (more than once a month). They will immediately be subjected to all reasonable vetting procedures and a DBS check (which includes barred list information) prior to starting as an unsupervised volunteer. Once an unsupervised volunteer has been fully vetted and their DBS check has been viewed they can be left alone with students (if the supervisor feels it is reasonable to do so) but will work under the direction of an established staff member and will be subject to the same code of conduct as paid employees of the school. Unsupervised volunteers are given the Staff Code of Conduct and are guided through the relevant parts of its implementation, in particular the section on safeguarding. Unsupervised volunteers will complete the Safeguarding Children and Adults at Risk online safeguarding programme provided by Southwark Council.

### **Governors**

All Governors will be subject to a DBS check prior to joining the Board of Governors. Governors who visit the school will be supervised by a member of staff at all times and will wear a visitor badge.

The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Appendix 3: Allegations against staff (including low-level concerns)**

London Christian School takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Head Teacher and nothing should be said to the colleague involved. In cases where the Head Teacher is the subject of the allegation or concern, this should be reported to the Chair of Governors (and nothing should be said to the Head Teacher), in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harm threshold- known as 'low level

concerns'.

#### **Section 1: Allegations that may meet the harms threshold**

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school and will be used in respect of all cases in which it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 would 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 that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a school's attention and appear to meet the above criteria. Contact can also be made with LA's School Safeguarding Coordinator who will liaise with the LADO. Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the Southwark Multi Agency Safeguarding Hub (MASH) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and [London Safeguarding Children Partnership \(LSCP\) procedures](#). This process will agree upon the appropriate course of action and the time-scale for investigations.

The school has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

### **Suspension**

Suspension 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 it might be grounds for

dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents 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

#### **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
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

#### **Procedure for dealing with allegations**

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
  - 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
- **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 or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

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

### **Timescales**

We 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 will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the 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 or malicious allegations**

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

### **Confidentiality**

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
  - What, if any, information can be reasonably given to the wider community to reduce speculation
  - How to manage press interest if, and when, it arises

### **Record-keeping**

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

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 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 retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious
- include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the

This will include consideration of (as applicable):

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

The full procedures about dealing with allegations of abuse made against teachers and other staff can be found in Part Four of the DfE guidance "[Keeping children safe in education](#)".

The Chair of Governors is: Chris Fishlock 07782315549

Southwark's LADO is: Eva Simcock – Tel: 020 7525 0689; Mob: 07943076608; Email: [Eva.Simcock@southwark.gov.uk](mailto:Eva.Simcock@southwark.gov.uk). LADO can also be contacted via [Qau.Safeguarding@southwark.gov.uk](mailto:Qau.Safeguarding@southwark.gov.uk)

There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297

The LA's Strategic Lead Officer for safeguarding in education services is: the Director of Education Nina Dohel 020 7525 3252

The LA's Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715

We also note the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark Council's website.

## **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 or other adult within or outside the school
- pre-employment vetting checks

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

### **Definition of low-level concerns**

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

- is inconsistent with the staff code of conduct including inappropriate conduct outside of work, **and**
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Examples of such behavior 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**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

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

### **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.

The records will be reviewed at least termly and the Head will decide on a course of action (in consultation with the DSL where appropriate). This course of action may include a review of school culture and/or policies to see whether policies need revising and/or training put in place.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "Keeping children safe in education".

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concerns raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

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

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

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

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

#### **Appendix 4: specific safeguarding issues**

**In addition to these types of abuse, neglect and exploitation, members of staff will also be alert to following 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 be absent or 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

We will follow our 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, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Please also see separate [Children Missing Education policy](#)

##### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The 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 may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol; children who go missing for periods of time or regularly come



home late

-children who regularly miss school or education or do not take part in education.

Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs 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 the local authority's children's social care team and the police, if appropriate.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

When it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the [London Child Protection Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

### **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.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse is not 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 children (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 nude 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 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support. We also note the DfE's advice and guidance on [Preventing and Tackling Bullying](#).

### **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 and affect their health, wellbeing, development and ability to learn.

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 DDSL will be aware of contact details and referral routes into 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 children's social care.

### **Mental Health**

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#).

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) 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.

### **FGM**

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

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

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating

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

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

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18.

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.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

We note The Forced Marriage Unit's statutory guidance [The right to choose: government guidance on forced marriage](#) and especially Chapter 8 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@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 forms of extremism.

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. 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.

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

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

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

Staff will be 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

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is not a single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent Duty Guidance: for England and Wales](#), especially paragraphs 141-210

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.

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

Children at risk of harm as a result of involvement or potential involvement in extremist activity will be referred to Southwark Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

### **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 SEN and/or disabilities, 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 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Sexual violence**

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

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

### **Consent**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats; and upskirting.

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

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

Reports of child on child sexual violence and sexual harassment will be managed in accordance with KCSIE 2024.

### **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.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing from school or home and are subsequently found in areas away from their home; have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a ‘traphouse or cuckooing’ or hotel room where there is drug activity; owe a ‘debt bond’ to their exploiters; have their bank accounts used to facilitate drug dealing.

### **Harmful sexual behaviour (HSB)**

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is



developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

### **Children who are lesbian, gay, bi, or trans (LGBT)**

We note that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

We will have regard to appropriate DfE guidance concerning gender questioning children.

### **Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. We also note the DfE's [Searching Screening and Confiscation Advice](#) for schools.

care.

### **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

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

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. ***Going to Court booklet*** (HM Courts and Tribunal Service Oct 2017) can be used to explain each step of the process, support and special measures that are available.

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

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

### **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity. If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub ([MASH](#)) by emailing [MASH@southwark.gov.uk](mailto:MASH@southwark.gov.uk) or calling **020 7525 1921**. Advice about whether there is a need to notify the council, can be obtained by calling **07539 346808** or sending an email to [privatefosteringadvice@southwark.gov.uk](mailto:privatefosteringadvice@southwark.gov.uk). In the case of a non-Southwark child, we will notify the relevant LA.

### **Upskirting**

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence.

### **Checking the identity and suitability of visitors**

A visitor to the school is any person who visits LCS to observe, not to take on a role or responsibility, such as a prospective parent. They will be asked to read the Guidance . They will wear a visitor badge and will be supervised by an accompanying member of staff at all times.

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

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

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 enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Safety in the school and transfer of Duty of Care**

No internal doors to classrooms will be locked whilst pupils are present in these areas.

Entry to school premises will be by secured doors that are controlled by office staff, or by constant staff supervision. In the case of individuals visiting the school in a professional capacity e.g. educational psychologists, social workers etc, we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They will be logged into and out of

the premises and will be asked to wear a school visitor badge. During arrival and dismissal times the entrance to the school will be open and will be manned by a member of staff at all times. If a parent wishes their child/ren to be picked up by another nominated adult, they must give written authorisation either at the beginning of the year or on an ad hoc basis. On arrival at the school, the identity of a nominated person for alternative collection will be checked by a member of the office staff before the child is permitted to leave the school.

Parents of children in Years 5 and 6 wishing to allow their child to independently make their way to and from school will fill in and sign an Independent Travel Arrangement Form. Decisions to allow children to independently travel to and from school will be made at the discretion of the Head Teacher. Unidentified visitors will be challenged by staff or reported to the Head Teacher or school office. Carelessness in closing any controlled entrance will be challenged. The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be reported to the police and the LA with a view to alerting other local schools through appropriate systems. Information sent to the school from the LA regarding local safeguarding incidents will, where appropriate, be forwarded on by email to parents and will be sent from the school Safeguarding Alerts email address.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school-organised activities with the prior consent of the school and then only in designated areas. Events such as the Sports Day or Christmas Assembly may be photographed or filmed by parents. Images taken by parents, carers or relatives must be for private use only. For photos used for educational purposes please see the Online Safety Policy.

Classroom teachers will constantly reappraise the environment and activities to which children are being exposed and make necessary adjustments to secure their safety at all times.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

In a case where a pupil cannot be located during a school day, the following action will be taken:

- Check the school premises
- Send two staff members out into the locality to search for the student
- Ring the parents to find out if they know the whereabouts of the student
- Ring the police to report the student as missing

In a case where a pupil cannot be located during an offsite activity, the following action will be taken:

- The trip lead will delegate another supporting adult to a) alert management of the venue visited, and b) search the premises. The trip lead will stay with the rest of the children and adults.
- The trip lead will call the school to alert senior staff immediately.
- The Head Teacher will be informed and will involve senior staff after which a senior member of staff will be sent to the venue to assist in the situation as soon as is reasonably practicable.
- The Head Teacher will inform the parents of the missing child as soon as possible and will alert the police and the LA via the Duty Desk.

In a case where a pupil is not collected from school, the following action will be taken:

- We will take actions according to Southwark's 'Protocol for Children who are Uncollected from School' when pupils who ordinarily do not make their own way home are not collected by their parents/carers at the end of the school day or from after school clubs and activities.
- If a pupil remains uncollected at the end of the school day, active steps will be taken by the school to contact the parent/carer or emergency contact by telephone. If contact cannot be established within a further 30 minutes (or by 16.30 if this is sooner), a senior member of the school staff will contact the MASH duty service to agree upon a timescale for further actions and ultimate hand-over of the child, as appropriate.
- Where a child, who is normally collected at the end of the club or session, is not collected by a responsible person, contact will be made with the child's parent or carer or the emergency contact. The school office will obtain from parents the name of an alternative carer or emergency contact. If the child remains uncollected 30 minutes after the end of the session (or by 16.45 for activities that are scheduled to end

at 16.30) and the alternative carer is not available, the Head teacher or Deputy Head will contact the MASH duty service. For sessions that end after 17.00, the contact will be the Emergency Duty Social Worker.

## **Appendix 5: LCS Safeguarding Summaries for staff, governors and peripatetic/contracted staff LCS**

### **LCS Safeguarding Summary for staff**

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

What is Significant Harm? (Further details can be found in Appendix 1 of the Safeguarding Policy)

- Physical harm
- Neglect
- Emotional abuse
- Sexual abuse

If a child discloses to you:

- Listen to and believe them. Ask open ended questions. Allow them time to talk freely and do not ask leading questions
- Ensure that any further discussion is moved to a professional and child free environment
- Offer reassurance, stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Be discreet, speak only to those who 'need to know'
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Complete a concern using the school's reporting system, 'My Concern'. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.
- Assume 'it could happen here'. If you are unsure about a concern or action seek the advice of the Designated Safeguarding Lead or Deputy.

Who do you tell?

-Designated Safeguarding Lead (DSL): Miss Katie Vivyan (Deputy Head Teacher)

-Deputy Designated Safeguarding Lead (DDSL): Miss Nicola Collett-White (Head Teacher)

Act quickly and share the information with the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads for Safeguarding at LCS. It is your responsibility to alert the Safeguarding Leads if

you suspect, hear or observe any concerns about a child.

Safeguarding Responsibilities:

- Staff/volunteers have a responsibility to adhere to the Staff Code of Conduct in respect of their contact with pupils and families.
- Children will be treated with respect and dignity and no sanctions, rewards or restraints are allowed outside of those detailed in the school's Behaviour Policy.
- Staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a *professional curiosity* and speaking to the DSL.
- Staff/volunteers should exercise caution in situations where they are on their own with children E.g. keep doors open, ensure clear glass door panels are unobstructed, tell another member of staff
- Confidential or sensitive information should be carefully protected. Safeguarding information should be shared with the DSL or DDSL only in accordance with safeguarding procedures (see Safeguarding Policy).
- Staff/volunteers should also be alert to the possible risks that might arise from social contact with parents and pupils outside of the school.
- Staff/volunteers will not communicate with pupils via social media (see Code of Conduct, Online Safety Policy and Acceptable User Policy).
- Staff/volunteers must be aware of their duty under the "Disqualification under the Childcare Act 2006" to report any changes in their circumstances which may affect their employment.
- Staff/volunteers should be aware of the Whistleblowing Policy.
- Remember that safeguarding is **everyone's** responsibility
- Remember that ultimately, all systems and processes should operate with the best interests of the children at their heart.

**I have read and understood the LCS Safeguarding Policy September 2024, Staff Code of Conduct, Part One and Annex B of Keeping Children Safe in Education 2024 and completed the National College 'Annual Certificate in Safeguarding for staff' course.**

Name:

Signed:

Date:

## **LCS Safeguarding Summary for peripatetic, activity and language teachers**

### **What is Safeguarding?**

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

What is Significant Harm? (Further details can be found in Appendix 1 of the Safeguarding Policy)

- Physical harm
- Neglect
- Emotional abuse
- Sexual abuse

### If a child discloses to you:

-Listen to and believe them. Ask open ended questions. Allow them time to talk freely and do not ask leading questions

-Ensure that any further discussion is moved to a professional and child free environment

-Offer reassurance, stay calm and do not show that you are shocked or upset

-Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

-Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

-Be discreet, speak only to those who 'need to know'

-Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

-Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

-Assume 'it could happen here'. If you are unsure about a concern or action seek the advice of the Designated Safeguarding Lead or Deputy.





### Who do you tell?

-Designated Safeguarding Lead (DSL): Miss Katie Vivyan (Deputy Head Teacher)

-Deputy Designated Safeguarding Lead (DDSL): Miss Nicola Collett-White (Head Teacher)

Act quickly and share the information with the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads for Safeguarding at LCS. It is your responsibility to alert the Safeguarding Leads if you suspect, hear or observe any concerns about a child.

### Safeguarding Responsibilities:

- Staff/volunteers have a responsibility to adhere to the Staff Code of Conduct in respect of their contact with pupils and families.
- Children will be treated with respect and dignity and no sanctions, rewards or restraints are allowed outside of those detailed in the school's Behaviour Policy.
- Staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a *professional curiosity* and speaking to the DSL.
- Staff/volunteers should exercise caution in situations where they are on their own with children E.g. keep doors open, ensure clear glass door panels are unobstructed, tell another member of staff
- Confidential or sensitive information should be carefully protected. Safeguarding information should be shared with the DSL or DDSL only in accordance with safeguarding procedures (see Safeguarding Policy).
- Staff/volunteers should also be alert to the possible risks that might arise from social contact with parents and pupils outside of school.
- Staff/volunteers will not communicate with pupils via social media (see Code of Conduct, Online Safety Policy and Acceptable User Policy).
- Staff/volunteers must be aware of their duty under the "Disqualification under the Childcare Act 2006" to report any changes in their circumstances which may affect their employment.
- Staff/volunteers should be aware of the Whistleblowing Policy.
- Remember that safeguarding is **everyone's** responsibility
- Remember that ultimately, all systems and processes should operate with the best interests of the children at their heart.

**I have read and understood the LCS Safeguarding Policy September 2024, Part One and Annex B of Keeping Children Safe in Education 2024 and completed the National College 'Annual Certificate in Safeguarding for staff' course.**

Name:

Signed:

Date:

## **LCS Safeguarding Summary for school governors**

### **What is Safeguarding?**

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

What is Significant Harm? (Further details can be found in Appendix 1 of the Safeguarding Policy)

- Physical harm
- Neglect
- Emotional abuse
- Sexual abuse

### If a child discloses to you:

-Listen to and believe them. Ask open ended questions. Allow them time to talk freely and do not ask leading questions

-Ensure that any further discussion is moved to a professional and child free environment

-Offer reassurance, stay calm and do not show that you are shocked or upset

-Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

-Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

-Be discreet, speak only to those who 'need to know'

-Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

-Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

-Assume 'it could happen here'. If you are unsure about a concern or action seek the advice of the Designated Safeguarding Lead or Deputy.

### Who do you tell?

-Designated Safeguarding Lead (DSL): Miss Katie Vivyan (Deputy Head Teacher)

-Deputy Designated Safeguarding Lead (DDSL): Miss Nicola Collett-White (Head Teacher)

Act quickly and share the information with the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads for Safeguarding at LCS. It is your responsibility to alert the Safeguarding Leads if you suspect, hear or observe any concerns about a child.

Safeguarding Responsibilities:

- The governing body will ensure that they know their responsibilities relating to the protection of children, young people and vulnerable adults, comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times.
- The governing body will also ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding.
- The governing body will do all that they reasonably can to limit children's exposure to the risks from the school's IT system. As part of this process, the governing body will ensure that the school has appropriate filters and monitoring systems in place and regularly review their effectiveness.
- The governing body will ensure that the school contributes to inter-agency working in line with statutory guidance "[Working Together to Safeguard Children](#)" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership.
- The governing body will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children.
- Children will be treated with respect and dignity and no sanctions, rewards or restraints are allowed outside of those detailed in the school's Behaviour Policy.
- Confidential or sensitive information should be carefully protected. Safeguarding information should be shared with the DSL or DDSL only in accordance with safeguarding procedures (see Safeguarding Policy).
- Staff/volunteers should also be alert to the possible risks that might arise from social contact with parents and pupils outside of school.
- The governing body should be aware of the Whistleblowing Policy.
- Remember that safeguarding is **everyone's** responsibility
- Remember that ultimately, all systems and processes should operate with the best interests of the children at their heart.

**I have completed The National College course 'Annual Certificate in Safeguarding for Governors' (2024-2025) and emailed the certificate to Katie Vivyan (DSL).**

**I have read and understood the LCS Safeguarding Policy September 2024 and 'Keeping Children Safe in Education 2024 Part 1 and 2 and Annex B'**

Name:

Signed:

Date: