

Laleham Lea School & Nursery

Safeguarding and Child Protection Policy

Safeguarding and Child Protection Policy

	Date	Signed
Date reviewed	September 2023	<i>Maria Reece</i> Acting Head Teacher <i>Maria Reece</i> DSL
Ratified by the Board of Governors	September 2023	Mary Ryan Chair of Governors
Date of next review	Sept 2024	

Table of Contents

<u>1</u>	Safeguarding Contact Details	3			
<u>2</u>	Introduction	5			
<u>3</u>	Principles	6			
<u>4</u>	Roles and responsibilities	6			
<u>5</u>	Key personnel	10			
<u>6</u>	Staff training	10			
<u>7</u>	Hierarchy of intervention	12			
<u>8</u>	Early help	12			
<u>9</u>	What to look out for and when to be concerned	14			
<u>10</u>	Contextual safeguarding	15			
<u>11</u>	Signs of abuse	15			
<u>12</u>	Listening to pupils and record keeping	16			
<u>13</u>	Procedure to be followed by staff if they have concerns about a pupil's welfare	16			
<u>14</u>	Duties of the DSL on being notified of a concern about a pupil's welfare	17			
<u>15</u>	Making a referral to children's social services	18			
<u>16</u>	Informing parents	18			
<u>17</u>	Allegations about members of staff, supply staff, contractors and volunteers	19			
<u>18</u>	Low-level concerns	24			
<u>19</u>	Arrangements for dealing with child-on-child abuse and allegations	25			
<u>20</u>	Child-on-child sexual violence and sexual harassment	27			
<u>21</u>	Other safeguarding arrangements	28			
<u>Appe</u>	ndix 1: Other types of abuse	35			
<u>Appe</u>	ndix 2: Further information on signs of abuse	40			
<u>Appe</u>	ndix 3: Actions where there are concerns about a child (KCSIE, September 2021)	45			
<u>Appe</u>	Appendix 4: Flowchart of when and how to share information46				
<u>Appe</u>	ndix 5 Child Protection Expression of Concern Form	47			
<u>Appe</u>	ndix 6: DSL Job Description	49			

1 Safeguarding Contact Details

School – Laleham Lea School

Position	Name	Phone	e-mail
Designated safeguarding lead (DSL)	Mrs Ammara Khan	020 8660 3351	lowerteacher@lalehamlea.co.uk
Deputy DSL	Mrs. Maria Reece	020 8660 3351	headteacher@lalehamlea.co.uk
Deputy DSL	Mrs. Ruth Saville	020 8660 3351	receptionteacher@lalehamlea.co.uk
Deputy DSL	Mrs Ann Mary Jose	020 8660 3351	amjose@lalehamlea.co.uk
Head Teacher	Mrs Maria Reece	020 8660 3351	headteacher@lalehamlea.co.uk
Chair of Governors	Mrs Mary Ryan	020 8660 3351	secretary@lalehamlea.co.uk
Safeguarding Governor	Mrs Mary Ryan	020 8660 3351	secretary@lalehamlea.co.uk

Local Authority children's social services numbers

Name	Phone	Out of hours phone	e-mail
Duty Care Team	0208 255 2888	020 8726 6400	childreferrals@croydon.gov.uk
MASH Team	020 8726 6464	0208 726 6400	childreferrals@croydon.gcsx.gov.uk
School Improvement Adviser	Anna Ljumovic	020 8241 5460	enquiries@octavopartnership.org

Allegations against staff

Title	Name	Phone	e-mail
Local authority's Senior LADO	Steve Hall (Senior LADO)	0208 255 2889	LADO@croydon.gov.uk
		Mob: 07825 830328	steve.hall@croydon.gov.uk
Local authority's designated officer (LADO)	Jane Parr (LADO)	020 8726 6000 Ext 84343)	LADO@croydon.gov.uk
			jane.parr@croydon.gov.uk
		Mob: 07716 092630	
Business Support Coordinator	Karen Anns	0208 726 6000	LADO@croydon.gov.uk
		Ext 23981	

Extremism

Title	Name	Phone	e-mail
Local Authority Prevent Lead for London	Jake Butterworth	077 9545 4722	jake.butterworth@education.gov.uk
DfE non-emergency advice	Telephone helpline020 7340 7264counter-and mailboxextremism@education.gsi.gov.uk		
Police	Non-emergency 101 number		
Anti-terrorism helpline		0800 789 321	Channel@croydon.gov.uk
Croydon Council	https://www.croydon.gov.uk/community/safercroydon/advice- information/counter-terrorism		
Sutton	https://www.sutton.gov.uk/info/200514/community_safety_and_policing/1259/ statutory_prevent_duty		

Mental Health Support

Title	Name	Phone	e-mail
Emotional wellbeing and mental health (EWMH) services-Croydon	www.croydon.gov.uk/ewmh call 0203 228 0000 for updates on the status of a referral		
DfE non-emergency advice	SPA team	0203 513 3800	SuttonCAMHSReferrals@swlstg- tr.nhs.uk https://www.swlstg.nhs.uk/our- services/find-a- service/service/sutton-camhs
Self-referral for young people and families	Croydon Drop- In	020 8680 0404	www.croydondropin.org.uk/
	Off the Record- Croydon	020 8251 0251	www.offtherecordcroydon.org/

Female genital mutilation (FGM)

Title		
Croydon FGM Risk Assessment Tool	Croydon risk assessment tool	
Croydon under 18'S FGM Referral	Croydon FGM referral pathwa	Υ
Pathway		
Sutton Guidance	Sutton LSCP FGM guidance	
Police	Non-emergency number	101

Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
NSPCC Victims of Sexual harassment and abuse	0800 136 663
helpline	
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
National Domestic Abuse Helpline	0800 2000 247
Child exploitation Online Prevent (CEOP)	0870 000 3344

MASH (Multi-Agency Safeguarding Hub):

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888 (9-5pm)

Professionals Consultation Line: Tel: 0208 726 6464 (1-4.30pm)

Out of Hours line: 020 8726 6400 (5pm-9am)

MASH Service Manager: Jonathan Lung

Email: Jonathan.Lung@croydon.gov.uk

Croydon Safeguarding Children Partnership (CSCP) Safeguarding learning & development

Website: https://croydonlcsb.org.uk/

Email: CSCP@croydon.gov.uk

Introduction

- 1.1 Laleham Lea is committed to safeguarding and promoting the welfare and wellbeing of children and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children and young people learn best when they are healthy, safe and secure.
- 1.2 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2023.)
- 1.3 This policy applies to all pupils in the School, including those in the EYFS.
- 1.4 The purpose of this policy is to inform all staff (including supply staff), parents (including guardians and carers), contractors, volunteers and governors about the School's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils even where this is away from the School, such as on educational visits or when delivering lessons online.
- 1.5 This policy is published on the School's website and is also available to parents of current and prospective pupils from the School Office on request. Large print or other accessible formats can also be made available.
- 1.6 The policy is in accordance with the Croydon Children's Safeguarding Partnership's agreed local interagency procedures.

[Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authority (Croydon); the clinical commissioning group; and the police. These safeguarding partners come together to form the Local Safeguarding Children's Partnership (LSCP), replacing what used to be referred to as the Local Safeguarding Children's Board (LSCB)]

- 1.7 This policy is also in accordance with current legislation and the following statutory guidance:
 - Keeping Children Safe in Education September 2023 (KCSIE)
 - Working Together to Safeguard Children July 2018 (WTSC)
 - Prevent Duty Guidance for England and Wales July 2015 (updated April 2021)
 - Education (Independent School Standards) Regulations 2014
 - What to do if you are worried a child is being abused advice for practitioners March 2015
 - Disqualification Under the Childcare Act August 2018
 - Statutory framework for the Early Years Foundation Stage March 2017
 - Children Missing Education September 2016
 - Relationships Education, Relationships and Sex Education and Health Education (2019)
 - Charity Commission guidance: safeguarding and protecting people for charities and trustees (2019)
 - 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
- 1.8 We are advised by the local Safeguarding and Child Protection in Schools and Education Officer, whom the DSL regularly consults on safeguarding matters. Contact details can be found in section 1 of this policy.
- 1.9 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

2 Principles

- 2.1 Laleham Lea expects all staff, governors and volunteers to share our commitment to safeguarding and promoting the welfare of all pupils in our care. To achieve this, the School seeks to create a safe School environment with a strong pastoral system, where pupils who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to pupils' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.
- 2.2 The School will take all reasonable measures to:
 - ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's **Safer Recruitment Policy**;
 - ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
 - follow the local inter-agency procedures of the Croydon Safeguarding Children's Partnership and contribute to inter-agency working;
 - support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
 - be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
 - deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
 - design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
 - be alert to the needs of pupils with physical and mental health conditions;
 - operate robust and sensible health and safety procedures;
 - operate clear and supportive policies on drugs, alcohol and substance misuse;

- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that the School premises are as secure as circumstances permit;
- teach pupils about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3 Roles and responsibilities

3.1 Safeguarding and child protection is **everyone's** responsibility. It is essential that everybody working at Laleham Lea understands their safeguarding responsibilities and that no single person or agency will hold the full picture for a child/family. Safeguarding and promoting the welfare of children is everyone's responsibility. **Everyone** who comes into contact with children and their families has a role to play.

All staff (including governors, supply staff, contractors and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which pupils can learn;
- consider at all times the best interests of the pupil and take action to enable all pupils to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures and follow them;
- if staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures according to this policy and by reporting concerns to the DSL or, where appropriate, to one of the key contacts in accordance with this policy;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.
- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- to understand that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- provide a safe space for pupils who are LGBT to speak out and share their concerns

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 and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of Relationship Sex Education (RSE) which is inclusive and delivered regularly, tackling issues such as: boundaries; consent; body confidence; stereotyping; and sexual harassment

3.2 The Designated Safeguarding Lead (DSL)

The School has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the School's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The School also has Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times. There is an addendum to this policy which outlines the measures the school has put in place to ensure there is effective DSL cover in the event of staff absence or lockdowns due to the ongoing COVID-19 pandemic.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2021):

- Managing Referrals: the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- Working with others: the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard pupils' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- Information sharing and managing the child protection file: the DSL is responsible for keeping childprotection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.
- **Raising Awareness:** the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the School may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- Providing support to staff: the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.

- Understanding the views of children: the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.
- The updated filtering and monitoring standards (KCSIE 2023) explain that the Designated Safeguarding Lead (DSL) should take responsibility for online safety as part of their safeguarding responsibilities, and work with IT providers (whether internal or external) so that specialist knowledge in both safeguarding and technological aspects of filtering are being deployed. The DSL should take the lead in monitoring that the filters are effective, again working with IT providers to test filters and ensure inappropriate content is blocked.

Note: A full description of the responsibilities of the DSL is set out in Appendix 6 of this policy.

3.3 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, a Deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but final lead responsibility for safeguarding and child protection remains with the DSL.

3.4 Head Teacher (DDSL for the academic year 2023-2024)

The Head Teacher is responsible for ensuring that the procedures outlined in this policy are followed on a day-today basis. To this end the Head Teacher will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- will ensure that an environment exists with the School in which all staff feel able to raise concerns about poor or unsafe safeguarding practice and that such concerns are handled sensitively (whistle-blowing policy);
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk-assessed by appropriately-trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems which operate with the best interests of the pupil at heart are in place for pupils to express their views and give feedback;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy and low-level concerns procedures;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2023 Laleham Lea will inform shortlisted candidates that online searches may be done as part of due diligence checks;
- she acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO); and

• she notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

3.5 Governing Body

The Governing Body's has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is the role of the Governing Body to provide scrutiny of the safeguarding policy and safeguarding practice. The Governing Body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Governors will ensure that:

- an effective, up-to-date child protection policy is in place and made available on the School's website;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- an appropriate member of staff from the School's leadership team is appointed to the role of DSL
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- pupils are taught about safeguarding, including online safety;
- the School's safeguarding arrangements reflect the procedures and practice of the Croydon Safeguarding Children Partnership;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of pupils are identified;
- clear systems and processes are in place for identifying and managing pupils with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a pupil's new school or School in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online and ensuring that leadership teams and staff are aware of their responsibilities with regards to knowledge of filtering and monitoring systems in place, the management of them and how to escalate any concerns.
- put in place appropriate safeguarding responses to children who go absent from education or who are absent, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in the future.
- the School reports to their local authority any pupil who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance; and
- written assurances are provided by individuals or organisations who hire School premises confirming appropriate safeguarding and child protection procedures are in place.

3.6 Safeguarding Governor

Mrs Mary Ryan is the nominated Safeguarding Governor who takes lead responsibility for monitoring the operation of safeguarding arrangements in the School. This is done in a number of ways, these being:

- discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- liaising with the local authority and/or partner agencies where appropriate; and
- conducting an annual audit of the School's safeguarding procedures and submitting a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the

School is making to inter-agency working; and the provision for teaching pupils how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

3.7 The nominated Governor for Safeguarding is **Mrs Mary Ryan** and her contact details are set out in Section 1 of this policy.

4 Key personnel

The DSL at the School is **Mrs Ammara Khan.** If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs **Mrs Maria Reece, Ruth Saville** or **Mrs Ann Mary Jose**. The DSL or Deputy DSL are always available when the School is open to discuss safeguarding concerns with staff, either in person or via telephone or email.

4.1 Outside School hours and during out-of-term activities, a designated member of the SMT will assume temporary responsibility.

Mrs Ammara Khan oversees safeguarding within the EYFS and the welfare of looked-after children.

4.2 Contact details for all the above are contained in section 1 of this policy.

5 Staff training

- 5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.
- 5.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child-protection training which covers:
 - This safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent*;
 - Part 1 and Annex B of KCSIE*;
 - the role, identity and contact details of the DSL and Deputy DSLs;
 - policies on acceptable use of IT and online safety (including when they are online at home)*;
 - the pupil behaviour policy*;
 - the School's safeguarding response to pupils who are absent from education;
 - the Staff Code of Conduct*;
 - the School's policy on Whistleblowing*; and
 - an overview of the Local Safeguarding Children Partnership's procedures.
 - the expectations, applicable roles and responsibilities in relation to filtering and monitoring

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

5.3 All staff, including the Head Teacher and volunteers involved in regulated activity, will undertake appropriate child- protection training which, in line with LSCP guidance, is updated every year. In addition, all staff will receive safeguarding updates delivered through a combination of staff meetings and INSET, and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training, where appropriate.

- 5.4 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the staff section of the Staff shared area on the server and in the Staff Room.
- 5.5 All staff receive appropriate safeguarding and child protection training at Induction as well as regular safeguarding updates, including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at Induction.
- 5.6 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, child-on-child abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.
- 5.7 The DSL and Deputy DSLs undertake training that is in accordance with locally agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be obtained for those who have specific responsibility for EYFS and looked-after children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:
 - keep abreast of best practice for promoting a culture of listening to children;
 - remain up to date on the mechanics of inter-agency working as operated by Croydon and Sutton LSCPs;
 - understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments;
 - have an up-to-date working knowledge of how local authorities conduct child-protection case conferences so they can contribute to these effectively when required to do so;
 - be alert to the specific needs of children in need, those with Special Educational Needs and young carers;
 - understand and support the School regarding the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
 - be able to keep proper written records of concerns and referrals.
- 5.8 All members of the Governing Body receive training at least on a three-yearly basis, to ensure they have the knowledge necessary to exercise appropriate oversight over the School's safeguarding policies and procedures. All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated.

6 Hierarchy of intervention

- 6.1 The Croydon Safeguarding Children's partnership publishes <u>threshold guidance</u> that all agencies, professionals and volunteers in the borough can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Threshold requirements can and do vary from one Local Authority to another and the School will follow the threshold guidance provided by the Local Authority in which they usually live. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.
- 6.2 Within the continuum, there are four levels of intervention:

Level 1: No additional needs

These are children with no additional needs; all their health and developmental needs will be met by universal services. These are children who consistently receive child focused care giving from their parents or carers. The majority of children living in each local authority area require support from universal services alone.

Level 2: Early help

These are children with additional needs, who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, not known or not being met. These children may be subject to adult focused care giving. This is the threshold for a multi-agency early help assessment to begin. These are children who require a lead professional for a co-ordinated approach to the provision of additional services such as family support services, parenting programmes and children's centres. These will be provided within universal or targeted services provision and do not include services from children's social care.

Level 3: Children with complex multiple needs

These children require specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled. They may require longer term intervention from specialist services. In some cases these children's needs may be secondary to the adults needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Level 4: Children in acute needs

These children are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes. Their needs may not be considered by their parents. This tier also includes Tier 4 health services which are very specialised services in residential, day patient or outpatient settings for children and adolescents with severe and /or complex health problems. This is likely to mean that they may be referred to children's social care under section 20, 47 or 31 of the Children Act 1989. This would also include those children remanded into custody and statutory youth offending services.

7 Early help

- 7.1 The School recognises the importance of providing early help to pupils needing support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.
- 7.2 Pupils are encouraged to raise concerns as soon as they are identified, either through their class teacher or directly with the Designated Safeguarding Lead, so that effective early support can be provided. They should be taken seriously and never be made to feel that they are creating a problem for reporting concerns or abuse.
- 7.3 If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account the LSCP's threshold criteria, consider what action should be taken. The school, with statutory safeguarding partners, will discuss and agree the levels for the different types of assessment as part of local arrangements.
- 7.4 If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.
- 7.5 The School has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, regular safeguarding meetings with staff, the School's pastoral system, the PSHCE and Relationship Sex

Education (RSE) programme and various policies, including Anti-Bullying and E-Safety. Staff training also prepares staff to identify children who might benefit from early help.

- 7.6 The School recognises the increased vulnerability of young people to whom any or all of the following apply:
 - are Disabled or have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan) as they are more prone to peer-group isolation or bullying (including prejudice-based bullying);
 - do not have English as a first language;
 - are living away from home for the first time;
 - are frequently missing from care or home
 - are faced with challenging family circumstances;
 - are showing signs of being drawn into anti-social or criminal behaviour
 - are looked after children;
 - are acting as a young carer;
 - are misusing drugs or alcohol themselves;
 - are at risk of being radicalised or exploited
 - are showing early signs of abuse, neglect or mental health problems; and
 - may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these young people for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with Special Educational Needs or Disabilities (SEN/D) can be disproportionately impacted by bullying/child-on-child abuse without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled pupil's understanding of abuse.

8 What to look out for and when to be concerned

- 8.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.
- 8.2 **Child abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (child-on-child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL)
- 8.3 Staff should be aware of the four main categories of child abuse which are commonly identified:

- **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily through a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and is covered in greater detail later in this policy (section 20).
- **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 8.4 Other forms of abuse which staff should be aware of are:
 - Children absent from education
 - Child sexual exploitation (CSE)
 - Child criminal exploitation (CCE)
 - County lines
 - Domestic abuse
 - Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
 - Forced marriage
 - Radicalisation
 - Child-on-child
 - Sexual violence and harassment (including up skirting)

Further information is provided in Appendices 2 and 3 of this policy and in Part 1 and Annex B of KCSIE.

9 Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, and serious youth violence.

10 Signs of abuse

- 10.1 All staff need to be aware that pupils may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place and inform the DSL team of any concerns they might have.
- 10.2 Possible signs of abuse include (but are not limited to) the following (and these do not necessarily mean that abuse is occurring):
 - the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
 - the pupil has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
 - the pupil shows signs of injury on a regular or patterned basis
 - the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
 - the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
 - the pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
 - the pupil appears reluctant to return home or has been openly rejected by parents or guardians
 - the pupil's development is delayed in terms of emotional progress
 - the pupil withdraws emotionally showing a lack of trust in adults
 - the pupil shies away from being touched or flinches at sudden movements
 - the pupil loses or gains weight
- 10.3 Further guidance is provided in Appendix 2. Other sources of information on the signs of abuse include: the DfE advice note <u>What to do if you're worried a child is being abused (2015)</u> and the <u>NSPCC website</u>.

11 Listening to pupils and record keeping

- 11.1 The School provides a range of opportunities for pupils to be listened to. These include: School Council, pupil questionnaires, daily interactions with teachers and adults around the school, PSHCE and RSE lessons include 'circle time' and NSPCC workshops are held for the School. Contact details for the NSPCC Childline are available in all classrooms.
- 11.2 If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:
 - immediately stop any other activity to listen;
 - listen carefully to the pupil and keep an open mind do not interrupt or be afraid of silences;
 - limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoiding leading questions (such as, "has this happened to your siblings?") that may prejudice an investigation;

- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible, and take no further action unless instructed to do so by the DSL or the Head Teacher;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.
- 11.3 Staff must record in writing all concerns, discussions and decisions made about a pupil as soon as possible on a cause of concern form (See Appendix 5). The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:
 - its date, time and place
 - what was said and done, by whom and in whose presence
 - any noticeable non-verbal behaviour or words used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

- <u>https://www.gov.uk/government/publications/searching-screening-and-confiscation</u>
- Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020).

12 Procedure to be followed by staff if they have concerns about a pupil's welfare

- 12.1 If a member of staff has concerns about a pupil's welfare, including any mental health concerns, **they must inform the DSL as soon as possible**, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff), contractors and volunteers* below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a pupil safe.
- 12.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.
- 12.3 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and '<u>Guidance for Schools</u>' information.)
- 12.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

- 12.5 Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's Director of Studies or other member of staff, who will notify the DSL.
- 12.6 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

13 Duties of the DSL on being notified of a concern about a pupil's welfare

- 13.1 When the DSL is notified of any concerns about a pupil's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.
- 13.2 Factors that the DSL should bear in mind when making their decision include:
 - the best interests of the child
 - the nature and seriousness of the complaint
 - contextual factors
 - the referral threshold set by the relevant Local Authority
 - the pupil's wishes or feelings
 - the inter-agency procedures of the relevant Local Safeguarding Children Partnership
 - where relevant, local information sharing protocols relating to Channel referrals.
- 13.3 If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the pupil's situation does not appear to be improving.
- 13.4 Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been brought to their attention. These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs. Such records will include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved; and
 - a note of any actions taken, decisions reached and the outcome.

14 Making a referral to children's social services

- 14.1 When a pupil is **NOT** considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the pupil lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency earlyhelp assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.
- 14.2 If a pupil is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Further guidance on when to call the police is provided by the <u>NPCC - when to</u> <u>call the police</u>. The School is not required to obtain parental consent prior to a referral being made.

- 14.3 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.
- 14.4 If the DSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.
- 14.5 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.
- 14.6 If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up, to ensure both that their concerns are addressed and that the pupil's situation improves.
- 14.7 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly, and in any event within five to ten working days.
- 14.8 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

15 Informing parents

- 15.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Head Teacher before discussing details with parents.
- 15.2 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.
- 15.3 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.
- 15.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

16 Allegations about members of staff, supply staff, contractors and volunteers

16.1 Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their pupils at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a pupil.

- 16.2 The following procedures will be used where it is alleged that a member of staff, a supply teacher, contractor or volunteer has:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
 - behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

These criteria are often referred to as the allegation or harms threshold. The procedures outlined below aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part 4 of KCSIE (September 2021).

16.3 Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 17.2:

- Where an allegation is made about a member of staff, supply staff, the DSL, contractor or volunteer, the
 matter should be reported immediately to the Head Teacher, or in the Head Teacher's absence, to the
 Safeguarding Governor (Mrs Mary Ryan) or the Chair of Governors (Mrs Mary Ryan). The adult to whom
 the allegation relates should not be informed without the explicit consent of the Local Authority
 Designated Officer (LADO), the person designated by the local authority to be involved in the management
 of allegations against people who work with children.
- Allegations about the Head Teacher should be reported to the Chairman of Governors and the Safeguarding Governor, Mrs Mary Ryan, without first notifying the Head Teacher.
- Allegations about a governor should be reported to the Chair of Governors. If the allegation is against the Chair of Governors, the matter should be reported to the Safeguarding Governor.
- The Head Teacher or Chair of Governors who receives any such allegation is referred to in these procedures as the 'case manager'.

16.4 Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with the Croydon Safeguarding Children's Partnership procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria in para 17.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 17.2 will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO is consulted. The purpose of the initial

discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Any allegations of serious harm or abuse by any person living, working or looking after children in the
 nursery or EYFS years (whether that allegation relates to harm or abuse committed on the premises or
 elsewhere) will be notified to Ofsted as soon as practicable (and within 14 days at the latest), and include
 details of the action taken in respect of the allegations.
- Where an adult makes an allegation to the School that they were abused as child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with the LSCP's procedures for dealing with such allegations. The LADO will then coordinate with the children's social care and the police.

16.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, children's social care and the police.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

16.6 Investigation

- Investigations will usually be undertaken by a senior member of School staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- It is recognised that the School may have to consider an allegation against an individual not directly
 employed by the School: for example, supply teachers provided by an employment agency or business.
 The School will ensure the agency are made fully aware of any allegations are dealt with properly. Prior to
 ceasing using a supply teacher due to safeguarding concerns, the facts will be found out and the LADO
 liaised with to determine a suitable outcome. Laleham Lea School will take the lead in the investigation, to
 ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have
 direct access to pupils or other school staff. They would therefore not be able to collect the facts or liaise
 with the LADO, police and/or children's social services. The agency will be made aware of the issues and

be fully involved, even though the School is taking the lead. For example, the School will discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the School.

- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
 - Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the investigation.
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

16.7 Support

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- The School will also provide access to counselling or medical advice, where appropriate.
- The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.
- Support will also be offered to the pupil(s) affected and their parents or guardian. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most suitable and effective way.

16.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where
 there is cause to suspect that a pupil, or other pupils at the School, is/are at risk of significant harm, or
 where the allegation is so serious that it might be grounds for dismissal. The School will consider whether
 the result that would be achieved by suspension could be obtained by alternative arrangements, such as
 redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School
 will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair
 investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this: for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

16.9 Confidentiality and information sharing

- The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact on all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal
 offence to publish information that could lead to the identification of a member of staff who is the subject
 of an allegation before they are charged with an offence. Publication includes any speech, writing,
 relevant programme or other communication, in whatever form, which is addressed to the public at large
 or any section of the public.
- The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:
 - \circ $\;$ Who needs to know about the allegation and what information can be shared
 - How to manage speculation, leaks and gossip, including how to make the parents or guardian of the pupil 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, or when, it arises
- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by Laleham Lea School.

16.10 Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a pupil is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:
 - If the pupil who made the allegation needs help or may have been abused by someone else and, under such circumstances, whether a referral to pupil's social services is appropriate
 - whether to take disciplinary action against the pupil in accordance with the School's Behaviour Policy.
- If a parent has made a deliberately invented or malicious allegation the Head Teacher will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

16.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a
 member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are
 allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to
 provide services will not prevent a referral being made to the Disclosure and Barring Service where
 appropriate.
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents:

<u>Teacher misconduct: information for teachers</u> and <u>Teacher misconduct: the prohibition of teachers</u> (as updated from time to time) to decide whether a referral should be made.

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances
of the case with the case manager to determine whether any improvements could be made to the
School's procedures to prevent the occurrence of similar events in the future. Consideration will also be
given to how the investigation process was managed, including, where appropriate, the use of suspension
of the accused. The case manager will produce a written report that will be presented to the governors
without delay.

16.12 Charity Commission

- Laleham Lea School as a registered charity has a duty to protect people who come into contact with its work as a charity from abuse or mistreatment of any sort. As part of this duty the School is required to notify the Charity Commission of serious incident involving pupils or other beneficiaries of the charity. Examples of where such a report would be required include (but are not limited to):
 - incidents (alleged or actual) where pupils have been abused or mistreated whilst under the School's care or by individual(s) connected to the School
 - o failures to follow policies and procedures which have put pupils at significant risk of harm
- It is the responsibility of the Governing Body to ensure such reports are made promptly. The report will circumstances of the incident, actions taken by the School and details of lessons to be learnt from the subsequent review. The Governors will also ensure that an action plan is put in place to ensure any deficiencies or weaknesses in the School's safeguarding arrangements are remedied without delay.

16.13 Record keeping and references

- Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, the School will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious.

17 Low-level concerns

- 17.1 As part of a whole School approach to safeguarding, Laleham Lea School seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low-level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.
- 17.2 A "low-level' concern is any concern no matter how small, and even if no more than causing a sense of unease or a nagging doubt that an adult has acted in a way that:
 - Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
 - Does not meet the allegation threshold (see 17.2) or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

- 17.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with pupils; showing favouritism; taking photographs of pupils on a personal device; or, humiliating pupils or using intimidating or offensive language.
- 17.4 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Head Teacher. In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Head Teacher, it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Head Teacher/Chair of Governors when the matter has been investigated.
- 17.5 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Head Teacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.
- 17.6 Full details of how the Head Teacher will go about investigating low-level concerns are set out in an annex to the Staff Code of Conduct. In brief, the Head Teacher will collect as much evidence as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.
- 17.7 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.
- 17.8 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.
- 17.9 Records of low-level concerns will be reviewed at least termly by the DSL, Head Teacher and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

18 Arrangements for dealing with child-on-child abuse and allegations

18.1 Most instances of pupils causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as child-on-child abuse). This type of abuse can happen both inside and outside of School and online. Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical violence 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;
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt)
 without their permission and or knowledge with the intention of viewing their genitals or buttocks (with
 or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Upskirting is now
 a criminal offence. Anyone of any gender can be a victim.)
- consensual and non-consensual sharing of nude and/or semi-nude images and/or videos (also known as sexting, or youth-produced sexual imagery); and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 18.2 It is more likely that girls will be victims and boys perpetrators of child-on-child abuse. Child-on-child abuse also often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.
- 18.3 Pupils with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.
- 18.4 Whilst sexual violence and sexual harassment are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 20.
- 18.5 The School has an important role in developing pupils' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:
 - not assuming child-on-child abuse is not occurring because known cases are rare when it may in fact be that such abuse is occurring and are simply going unreported by pupils;
 - enforcing the School's rules, which are explicit about the high standards of behaviour and courtesy the School expects;
 - implementing in a consistent way its Behaviour Policy;
 - being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - not tolerating or dismissing any form of child-on-child abuse as 'banter', 'just having a laugh' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils; and
 - implementing the School's anti-bullying strategy.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate PHSCE and RSE lessons which develop pupils' understanding of
 acceptable behaviour. Themes covered in these lessons that are particularly relevant to child-on-child
 abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power
 imbalances in relationships
- having systems in place to for any pupils to raise concerns with staff, knowing that that their concerns will be taken seriously and that they will be listened to, believed and valued eg during Tutor Time.
- delivering targeted work on assertiveness and keeping safe for those pupils identified as being potentially vulnerable
- having robust supervision arrangements for the playground, dining room and in classrooms.
- 18.6 If a pupil discloses that they or another pupil has been the victim of child-on-child abuse, the guidance for gathering and recording the information provided in Section 12 of this policy should be followed.
- 18.7 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (ie where there is reasonable cause to suspect a pupil is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved, including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2023).
- 18.8 A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.
- 18.9 If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview. If a pupil's parents are abroad, the pupil's education guardian will be asked to support the pupil and to accommodate him or her if they have been suspended.
- 18.10 Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment, appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

19 Child-on-child sexual violence and sexual harassment

- 19.1 Sexual violence includes acts such as sexual assault, assault by penetration, and rape (this may include an online element which facilitates, threatens and/or encourages sexual violence). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.
- 19.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), upskirting, displaying pictures, drawings or photos of a sexual nature
- Online harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), unwanted sexualised comments and messages
- 19.3 Sexual violence and sexual harassment can occur between pupils of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, pupils with SEND, and LGBTQ+ pupils are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.
- 19.4 Pupils may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.
- 19.5 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. 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, or their experience minimised. Staff should reassure victims that the law on child-on-child abuse is there to protect them, not to criminalise them. Consideration for intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment will be considered. Staff should remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.
- 19.6 Section 12 of this policy provides general guidance for listening to pupils and record-keeping. Effective safeguarding practice in the context of claims of sexual violence or harassment further requires the following:
 - If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
 - Where the report includes an online element, staff should know and following the <u>searching</u>, <u>screening</u> and <u>confiscation advice (for schools)</u> and <u>UKCIS advice on sharing nudes and semi-nudes</u>. The key consideration is for staff not to view or forward illegal images of a child. The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
 - The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so pupils may not be able to recall all details or timeline of abuse.
- 19.7 The School will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed; the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed; the ages of the children involved; the developmental stages of the children involved; any power imbalance between the children (eg whether the alleged perpetrator(s) significantly older, more mature or more confident); whether the victim has a disability or

learning difficult; whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature); that sexual violence and sexual harassment can take place within intimate personal relationships between peers; whether there are ongoing risks to the victim, other children, adult pupils or school or School staff; and, other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- 19.8 The DSL will reach a judgement about which of the following four ways is the most appropriate for handing the case:
 - Internal management: handled entirely within the School.
 - Early help: where the pupils concerned do not require referral to statutory services but may benefit from assistance from an external agency.
 - Children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
 - Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The School will follow the guidance as set out in detail in KSCIE (2021), Part 5.

- 19.9 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where pupils have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.
- 19.10 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to children's services is appropriate.

20 Other safeguarding arrangements

20.1 Mental health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils 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 young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. Further details are provided in the School's Mental Health and Emotional Well-Being Policy.

20.2 Teaching pupils to keep themselves safe

The School is committed to educating pupils about how to stay safe, based on a wide view of what may happen to pupils, not only in School but also in the wider world. These are explored in a variety of contexts, including Relationship and Sex Education lessons, assemblies, weekly Liturgies academic and PSHCE lessons. Issues covered include online safety (cyber-bullying and sexting), radicalisation, grooming, child sexual exploitation, healthy relationships, mental health, substance misuse and bullying. Pupils are also taught how to identify risks and how to modify their behaviour to mitigate these risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. Resources are provided to parents when they join the School (Acceptable use of IT Policy) and copies of this are readily available in school.

20.3 Online safety

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation, sharing indecent images (consensually or non-consensually), viewing pornography, and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

- 1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
- 2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 3. **Conduct**: Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include threats to: health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.
- 4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<u>https://apwg.org/</u>).

The School also has a range of filtering systems in place to keep pupils safe when accessing the internet whilst at the School, and usage is also monitored (see the School's E-safety Policy for further details). Laleham Lea uses Smoothwall for monitoring. Smoothwall is a real-time content-aware analysis system. It scans the copy, content and context of every page for unwanted material. The DSL then receives a weekly report outlining the activity of individuals, both staff and pupils, and whether any inappropriate content has been searched or accessed. Laleham Lea have a sophisticated filtering system so that internet access and content is age appropriate and this is provided through JSPC.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measure are routinely reinforced in lessons and at pastoral events. The School has an Acceptable Use of IT policy. It manages access to the internet via 3G/4G/5G using filters and monitoring systems to ensure the School's network and IT equipment are being used in a safe and appropriate manner.

20.4 Remote learning

Where education is taking place remotely, Laleham Lea will emphasise the importance of a safe online environment and encourage parents and carers to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

When communicating online with parents and pupils, staff will:

- communicate within school hours as much as possible (or hours agreed with the school to suit the needs of staff)
- communicate through the school channels approved by the senior leadership team

- use school email accounts (not personal ones)
- use school devices over personal devices wherever possible
- not share personal information

If staff or parents want to report a concern they must contact the DSL immediately. All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing.

Where virtual lessons or live streaming occurs, staff will try and find a quiet or private room or area to talk to pupils, parents or carers. When broadcasting a live lesson or making a recording, consideration will be taken of the visible surroundings and background (please read alongside the Safeguarding Addendum in response to COVID-19).

20.5 Mobile phones and cameras

The use of personal mobile phones, iPads, video recorders or cameras is not permitted in the EYFS setting when in the presence of children or when on school outings. Personal mobile phones, iPads, video recorders or cameras must be stored securely in a designated area.

The School provides mobile phones for trips and cameras for taking photographs when necessary. Mobile phones must not be used when supervising or teaching pupils except in cases of emergency or for the completion of electronic class registers. Images of pupil must not be taken or stored on any personal mobile phone. If a phone is to be used for School blogs or Twitter whilst on educational visits, permission must be obtained from the Head Teacher and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of pupils (including those in the EYFS) by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the School website and newsletter. Written permission is obtained when a pupil joins the School and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the School website and in School publications). The DSL will ensure that all staff are aware of the names of pupils who may not be photographed or where there is limited consent. Images of pupils on the website will not be named. Images may only be captured on School cameras and the images may only be stored on those cameras and on the School's password-protected computers. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives, but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all pupils must be appropriately dressed
- images that only show a single pupil with no surrounding context should be avoided: photographs of three or four pupils are more likely to include the learning context
- use photographs that represent the diversity of pupils participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a pupil who is considered vulnerable, unless parents or a guardian have given specific written permission

The SMT will review (at least annually), stored images and delete unwanted and out-of-date material.

Parents should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

20.6 Risk assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole School, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School's Risk Assessment Policy.

20.7 Staff recruitment

The School is committed to safer recruitment processes. Members of teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coached are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted. Laleham Lea will inform shortlisted candidates that online searches may be done as part of due diligence checks (as advised in KCSIE 2023)

20.8 Children missing education procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the Local Authority pupils who are missing from School for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. See the School's Missing in Education Policy for full details.

The School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a nonstandard transition point; ie, where a compulsory school-aged pupil leaves the School before completing the School's final year. When this notification is made the following information has to be provided by the School: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination School and expected start date; and the reason why the pupil is leaving the School.

The School is also legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone number at which the parent can be contacted in an emergency*; date of birth; name and address of last School attended (if any); and details of whether they are a boarder or a day pupil.

*Note: In line with KCSIE 2021, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.

20.9 The Prevent Duty

All Schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Laaleham Lea's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership liaising closely with the LSCP to ensure pupils requiring support are referred at a suitably early stage
- Staff training enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies to provide guidance to pupils as to how to stay safe online (see the School's Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

20.10 Visiting speakers

Any pupil or member of staff who wishes to invite a speaker to address pupils must provide details of the individual to the SMT in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a pupil, a member of the SMT, will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the School's SCR.

20.11 Confidentiality and information sharing

The School will keep all child-protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child-protection investigations.

Where a pupil who is subject to a child-protection plan is moving to another school, the DSL will ensure their child-protection file is securely transferred as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a pupil leaving: for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the pupil arrives. Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including educational outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance Information Sharing was published by the Government in July 2018. See Appendix 4.

20.12 Whistleblowing

All staff are required to report to the Head Teacher any concerns about:

• poor or unsafe safeguarding practices at the School;

- potential failures by the School or its staff to properly safeguard the welfare of pupils; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils.

If the member of staff feels unable to raise their concern with the Head Teacher (or a member of SMT) or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

20.13 School premises, security and visitors

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit. These include:

- Perimeter fencing
- Access control into school building only by the School office through electronic gates
- All external doors around the school are kept locked
- All staff are identified by photo ID cards worn at all times during school related activities and duties. A Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the School'spremises.

20.14 Monitoring this Policy

- Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the Board of Governors.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a monthly report to the governors, as part of the Head Teacher's Report.
- The governors will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

20.15 Other relevant policies

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Safer Recruitment Policy
- Code of Conduct for Staff (with Low-Level Concerns Annex)
- Behaviour Policy
- E-Safety Policy

- ICT acceptable Use Policy
- Whistleblowing Policy
- Supervision Policy
- Missing Pupil Policy
- Mobile Phone Use Policy
- Relationships and Sex Education Policy

Appendix 1: Other types of abuse

- Children absent from education: all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of forced marriage. It is important the school response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

- CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate
 or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off
 occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It
 can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied
 by violence or threats of violence. The victim (male or female) may have been sexually exploited even if
 the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur
 through the use of technology. It can include both contact (penetrative and non-penetrative acts) and
 non-contact sexual activity and may occur without the child or young person's immediate knowledge (eg
 through others copying videos or images they have created and posted on social media).
- CCE is where 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 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 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 being forced or manipulated into threatening/committing serious violence to others.
- **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. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

- Children and the court system: Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.
- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime**. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:
 - unauthorised access to computers (illegal 'hacking');
 - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
 - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

• **Domestic abuse:** Domestic abuse includes any incident or pattern of incidents involving: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status sexuality or background. Domestic violence can take place inside or outside the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are also victims. It is important to remember that children can also be victims in their own relationships too. Witnessing domestic abuse can have a lasting impact on children.

When young people experience domestic abuse within their own intimate relationships, this is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators offered support.

- Serious violence: All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes in to the Local housing Authority so that they canraise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases college staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living independently for example, having being excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy should ensure appropriate referrals are made based on the pupil's circumstances.
- Honour-based abuse (HBA). So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
 - **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The

report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- Modern slavery: Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal or organs. The <u>modern slavery statutory guidance</u> provides more information on how to identify and support victims.
- Radicalisation and extremism: "Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. "Terrorism" is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. "Extremism" is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including 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. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for 'adventure' and excitement
- a desire to enhance self-esteem of the individual and promote 'street cred'
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they

may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. 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. It is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

• Sharing nudes and semi-nudes. The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known by the names 'youth-produced sexual imagery' or 'sexting'. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

Management of an incident. Any direct disclosure by a pupil should be taken seriously. Pupils who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the pupils, to consider:

- whether there is an immediate risk to any child or young person;
- if a referral should be made to the police and/or children's social care;
- if it is necessary to view the image(s) in order to safeguard the pupil in most cases, images or videos should not be viewed;
- what further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and/or platforms;
- whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible);
- any relevant facts about the pupil involved which would influence the DSL's risk assessment; and
- whether to inform the parents informed or whether involving them would put young person at risk of harm.

Viewing the Imagery. Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency (such as the <u>IWF</u>) to have it taken down; or (ii) to support the pupil or parent in making a report; or (iii) or that is unavoidable because the pupil has shown it directly to a staff member or because the imagery has been found on School equipment. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in <u>Sharing nudes and semi nudes: advice for education settings working with children and young *people (December 2020)*.</u>

Referral. Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the pupil. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to children's social care and/or the police immediately if the incident involves:

- involves an adult.
- If there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

Support. It is vital that continuing support be given to the pupil so that they know they are not alone. Pupils must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Pupils must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Pupils can use the <u>IWF</u> and <u>Childline's Report Remove tool</u> to report images and videos they are worried have been, or might be, shared publicly.

Deletion of imagery. If the School decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, pupils should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a pupil's device and delete imagery should be based on the professional judgement of the DSL.

Recording incidents. All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not been reported out to police or children's social care. Copies of imagery should not be taken.

Appendix 2: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
 Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child Human bite marks Broken bones 	 Behavioural extremes (withdrawal, aggression or depression) Unbelievable or inconsistent explanations of injuries Fear of parents being contacted Flinching when approached or touched Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
Eating disorders, including obesity or anorexia	Fear of parent being approached
 Speech disorders (stammering) 	Fear of making mistakes
Nervous disorders (rashes, hives, facial tics,	Developmental delay in terms of emotional progress
stomach aches)	Cruel behaviour towards children, adults or animals
	• Self-harm
	 Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable

Sexual abuse

Physical signs	Behavioural signs
Torn, stained or bloody underclothes	Self-harm
 Pain or itching in genital area 	Sexual knowledge or behaviour (promiscuity) that is
 Bruises or bleeding near genital area or anus 	beyond their age/developmental level
Sexually transmitted infections	 Sudden or unexplained changes in behaviour
Pregnancy	Avoidance of undressing or wearing extra layers of
 Discomfort when walking or sitting down 	clothing
	Truancy
	Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
Height and weight significantly below age level	Erratic attendance at School
Poor hygiene (lice, body odour etc)Inappropriate clothing for weather conditions	Chronic hunger or tirednessHaving few friends
 Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) 	Assuming adult responsibilities
 Constant hunger, sometimes stealing food from others 	

Child sexual exploitation

Physical signs	Behavioural signs
 Tiredness or mood swings Bruising Sexually transmitted diseases Pregnancy 	 Sudden decline in School performance, punctuality, attendance In possession of expensive goods Going to place they cannot afford Age-inappropriate clothing Inappropriate sexualised behaviour Secretive Deterioration in mental well-being Mixing with older people Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
See sections on physical and sexual abuse	Self-harming
Carrying weapons	 Persistently going missing from School or home and/or being found out of area
 Have been the victim or perpetrator of serious violence (eg knife crime) 	 Deterioration in mental well-being
 Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection 	 Unexplained acquisition of money, clothes or mobile phones
 Found in accommodation that they have no connection with, often called a 'trap house or 	 Excessive receipt of texts/phone calls and/or having multiple handsets
cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters	 Relationships with controlling older individuals or groups
Have their bank accounts used to facilitate drug	Significant decline in School performance
dealing	 Gang association or isolation from peers or social networks
	 Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

Female genital mutilation

Physical signs	Behavioural signs
Difficulty walking, sitting or standing	Abroad for a prolonged period
Bladder or menstrual problems	Unusual behaviour after a period of absence
 Severe pain and bleeding Infections such as tetanus, HIV and hepatitis B 	 May talk of a 'special procedure' or 'special occasion to become a woman'
and C	Spending longer periods in the bathroom
	Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
Cut or shaved hair as a form of punishment for being disobedient	 Absence from School Failure to return from visit to country of origin Self-harm or attempted suicide Running away from home Early marriage of siblings Sudden announcement of engagement to a stranger May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
See section on sexual abuse	Spending increasingly prolonged time online
	Having older boyfriends or girlfriends
	 Secretiveness about who they are talking to online and what sites they visit
	 Possession of electronic devices such as mobile phones or webcams that parents have not provided
	Engaging less with their usual friends
	 Using sexual language that you would not expect them to know
	Going to unusual places to meet people
	Using drugs and/or alcohol
	Going missing from home or School

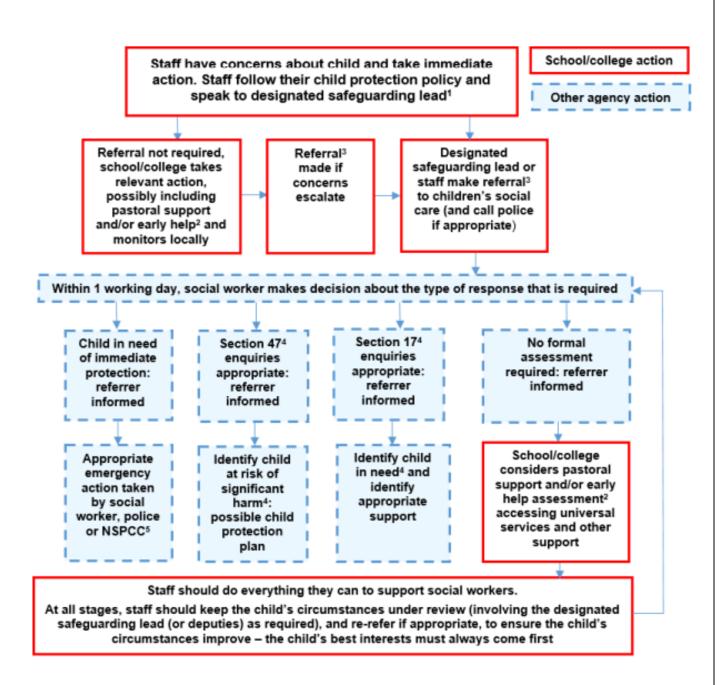
Radicalisation

Physical signs	Behavioural signs
 out of character changes in dress, behaviour, and peer relationships 	 Showing sympathy for extremist causes Glorifying violence Evidence of possessing illegal or extremist literature A sudden disrespectful attitude towards others Increased secretiveness, especially in relation to internet use Unwillingness or inability to discuss their views Increasingly judgemental or argumentative Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education September 2021)

- <u>bullying, including cyberbullying</u>
- <u>children missing education</u>
- <u>child missing from home or care</u>
- <u>child sexual exploitation</u>
- domestic violence
- <u>drugs</u>
- fabricated or induced illness
- <u>faith abuse</u>
- <u>female genital mutilation (FGM)</u>
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- <u>hate</u>
- <u>mental health</u>
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- <u>sexting</u>
- <u>trafficking</u>

Appendix 3: Actions where there are concerns about a child (KCSIE, September 2023)



1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

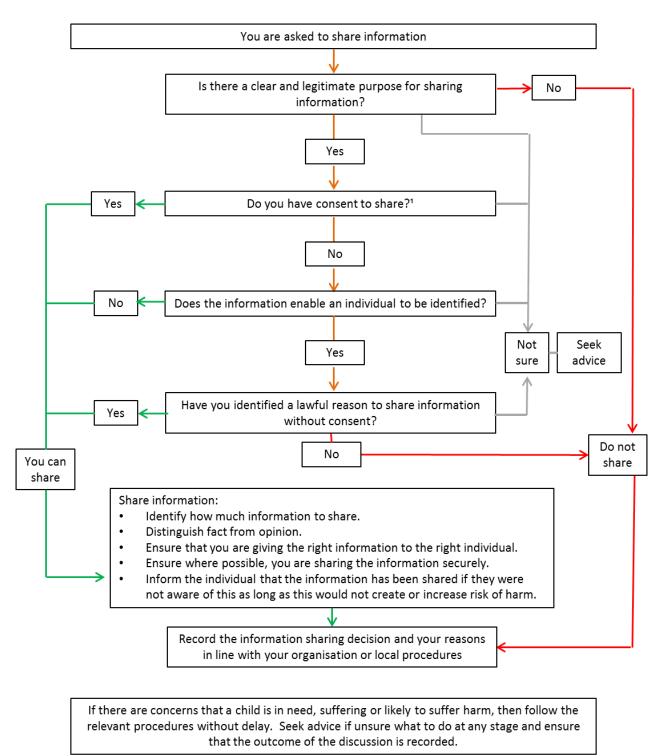
2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. See Working Together to Safeguard Children for further guidance

3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

5) This could include applying for an Emergency Protection Order (EPO).

Appendix 4: Flowchart of when and how to share information



Appendix 5 Child Protection Expression of Concern Form

This form should be completed when there is cause for concern and given to your Designated Safeguarding Lead as soon as possible.

Laleham Lea School



CHILD PROTECTION CONCERNS FORM

+	CHAIN DEC
Pupil Name	Class
Date Of Birth:	
Staff Name:	Date
Record of concerns :	-
Please circle as appropriate: Observation	Conversation Incident
Signed:	Date:
Pass to designated safeguarding person:	
Action by Designated Person:	
Signed:	Date:
Signed.	Dute.
Guidance notes:	
 Record exactly what the child says 	
Do not ask questions	
Do not take photographs	
Discuss any concerns with CPDP Do not discuss w	rith anyone else.
	48

Appendix 6: DSL Job Description

Job description fo	or the Designated Safeguarding Lead (DSL and DDSLs)
	ed to safeguarding and promoting the welfare of children and young people and expects all share this commitment
Summary of the role	• To take lead responsibility for safeguarding and child protection (including online safety) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise.
	• To provide advice and support to other staff on matters of child welfare, safeguarding and child protection.
	• To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils.
	• To promote and safeguard the welfare of pupils in the School.
	• Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	Further specifics:
Availability	You are expected to:
	 ensure during term time that you or a Deputy will always be available during School hours (8am – 6pm) to discuss any safeguarding concerns; and
	• arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
Managing referrals	You are expected to refer cases:
	• of suspected abuse and neglect of any pupil at the School to the local authority children's social care and support staff who make referrals to local authority children's social care;
	• to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme;
	• where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (DBS); and
	where a crime has been committed to the Police.
Working with others	You are expected to:
	 act as a source of support, advice and expertise for all staff;
	• act as a point of contact with the three safeguarding partners: the local authority (Royal Borough of Kensington and Chelsea); the clinical commissioning group; and the Police;
	• liaise with the Head Teacher to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
	• as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member;

r	
	 liaise with staff (especially teachers, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
	 promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and
	 work with the Head Teacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the School. This includes:
	 ensuring that the School knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
	 supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
Information sharing	You are expected to:
and managing the child protection files	 ensure that child protection files are kept up to date.
	 ensure that information is kept confidential and stored securely.
	 ensure that records include:
	\circ a clear and comprehensive summary of the concern;
	\circ details of how the concern was followed up and resolved; and
	$\circ~$ a note of any action taken, decisions reached and the outcome.
	• ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE.
	ensure, when a pupil leaves the School, that:
	 their child protection file is transferred to the new school or School as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and
	 their child protection file is transferred separately from the pupil's main file in a secure manner and confirmation of receipt is received from the destination school or School; and
	• consider whether it is appropriate to share any information with the new school or School in advance of the pupil leaving.
Raising awareness	You are expected to:
	• ensure each member of staff has access to, and understands, the School's safeguarding policy and procedures, especially new and part-time staff;
	 ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,
	50

• ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
 link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
 help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.
You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.
In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:
• understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority children's social care referral arrangements;
 have a working knowledge of how local authorities conduct a child-protection case conference and a child-protection review conference and be able to attend and contribute to these effectively when required to do so;
 understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
 understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes;
• are alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND), those with relevant health conditions and young carers;
• understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners;
• understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
• are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
 can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online;
obtain access to resources and attend any relevant or refresher training courses; and
• encourage a culture among all staff of listening to pupils and taking account of their wishes and feelings , in any measures the School may put in place to protect them.

Providing support to staff	Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to:
	ensure that staff are supported during the referrals processes; and
	• support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
Understanding the views of children	It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:
	• encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and,
	• understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
Holding and sharing information.	The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should:
	• understand the importance of information sharing, both within the School, and with other schools and Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
	• understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and
	• be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.