



## Child Protection and Safeguarding Policy

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Applicable to:	SPS and SPJ		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to [policyquery@stpaulsschool.org.uk](mailto:policyquery@stpaulsschool.org.uk)

## Contents

1. KEY EXTERNAL CONTACT DETAILS.....	4
2. KEY SCHOOL CONTACT DETAILS .....	6
4. CONCERNS ABOUT A CHILD .....	10
4.1 Definitions of safeguarding and types and signs of abuse.....	11
5. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD .....	11
5.1 Contextual Safeguarding .....	12
5.2 Early Help .....	12
5.3 What staff should do if they have concerns about a child.....	13
5.4 What staff should do if a child is in danger or at risk of harm .....	14
5.5 What staff should do if a child is seen as at risk of radicalisation.....	14
The Prevent Lead at the School is the DSL.....	14
5.6 What staff should do if they discover an act of Female Genital Mutilation ("FGM") .....	14
5.7 What staff should do if they have concerns that children are at risk from or involved with serious violent crime .....	15
5.8 How should staff respond to an incident of nudes and semi-nudes being shared by pupils.....	15
5.9 What staff should do if a child has unexplainable and/or persistent absences from education .....	16
5.10 What staff should do if a child needs a social worker (Children in Need and Child Protection Plans) .....	17
5.11 What staff should do if a child requires mental health support .....	17
5.12 What staff should do if they have safeguarding concerns about another staff member .....	17
5.13 What staff should do if they have concerns about safeguarding practices in the School .....	18
6. ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD-ON-CHILD SEXUAL VIOLENCE AND HARASSMENT).....	18
6.1 Children with special educational needs and disabilities (SEND) .....	19
6.2 Children in residential settings.....	20
6.3 Steps to minimise the risk of child-on-child abuse .....	20
6.4 Procedures to be followed in the event of child-on-child abuse.....	21
6.5 Pupil suspension.....	22
6.6 Police referrals .....	23
6.7 Sharing of nudes and semi-nudes .....	23
6.8 Sexual violence and sexual harassment .....	24
6.9 Reflecting on patterns.....	25
6.10 False, unsubstantiated, unfounded or malicious reports.....	25
7. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HIGH MASTER, HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS) .....	25
8. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS, CONTRACTED STAFF OR ORGANISATIONS USING SCHOOL PREMISES.....	29

9. ARRANGEMENTS FOR DEALING WITH LOW-LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HIGH MASTER, HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS) .....	30
10. SAFER RECRUITMENT .....	32
11. MANAGEMENT OF SAFEGUARDING .....	32
12. TRAINING .....	34
12.1 All Staff .....	34
12.2 DSLs .....	35
13. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES .....	35
14. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES .....	35
14.1 Teaching children how to keep safe .....	35
14.2 Filtering and Monitoring .....	36
14.3 Relationships Education and/or Relationships and Sex Education ("RSE") .....	36
14.4 Looked after children .....	37
14.5 Arrangements for visiting speakers .....	37
14.6 Arrangements for Secure Premises .....	37
14.7 Arrangements for Health & Safety, Extended School Activities and Educational Visits .....	38
APPENDIX 1 – SIGNS AND TYPES OF ABUSE .....	39

## 1. KEY EXTERNAL CONTACT DETAILS

**For concerns about a child, or the behaviour of a member of staff, call the School's Single Point of Access on 0208 746 5353**

<b>Local Authority Designated Officer</b>	Achieving for Children Guildhall II, Kingston upon Thames 07774332675  Email: LADO@achievingforchildren.org.uk
<b>Local Authority Children's Social Services</b>	Single Point of Access (SPA) Team (Richmond Initial Response Team) 020 8547 5008  For out of hours / weekends: 020 8770 5000  <a href="mailto:spa@richmond.gov.uk">spa@richmond.gov.uk</a>  Website address for referral: <a href="#">click here</a> .
<b>Richmond and Kingston safeguarding strategic leadership group (Local safeguarding partnership arrangements)</b>	Website address for details: <a href="https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/">https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/</a>
<b>Support and Advice about Extremism</b>	<b>Police</b> EMERGENCY: 999 NON-EMERGENCY NUMBER: 101  <b>Local Authority</b> Single Point of Access (SPA) Team (Richmond Initial Response Team) 020 8547 5008  <b>Department for Education</b> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

<b>NSPCC Report Abuse in Education Advice Line</b>	TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Forced Marriage Unit</b>	TEL: 020 7008 0151 EMAIL: <a href="mailto:fmfu@fco.gov.uk">fmfu@fco.gov.uk</a>
<b>Richmond Child and Adolescent Mental Health Services (CAMHS)</b>	TEL: 020 8547 5008  For out of hours / weekends: 020 8770 5000  EMAIL: <a href="mailto:spa@richmond.gov.uk">spa@richmond.gov.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: <a href="mailto:customerservices@dbf.gov.uk">customerservices@dbf.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>
<b>Independent Schools Inspectorate</b>	TEL: 0207 6000100 EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a>

## 2. KEY SCHOOL CONTACT DETAILS

<b>Governors</b>	<p><b>Chair of Governors</b> Richard Cassell <a href="mailto:cassellr@stpaulsschool.org.uk">cassellr@stpaulsschool.org.uk</a></p> <p><b>Deputy Chair of Governors</b> Ali Palmer <a href="mailto:palmera@stpaulsschool.org.uk">palmera@stpaulsschool.org.uk</a></p> <p><b>Nominated Safeguarding Governor</b> Veryan Exelby <a href="mailto:exelbyv@stpaulsschool.org.uk">exelbyv@stpaulsschool.org.uk</a></p>
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St Paul's School ("SPS")	
<b>Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")</b>	<p><b>Whole School Lead DSL</b> Nick Hudson – Assistant Head (Safeguarding &amp; Pupil Wellbeing) (SPS) <a href="mailto:nch@stpaulsschool.org.uk">nch@stpaulsschool.org.uk</a></p> <p><b>Deputy DSLs</b> Nicola Taylor - Safeguarding Coordinator <a href="mailto:safeguarding@stpaulsschool.org.uk">safeguarding@stpaulsschool.org.uk</a></p> <p>Keri Cloete - Undermaster <a href="mailto:kmc@stpaulsschool.org.uk">kmc@stpaulsschool.org.uk</a></p> <p>James Gilks - Undermaster <a href="mailto:jarg@stpaulsschool.org.uk">jarg@stpaulsschool.org.uk</a></p> <p>Hannah Warner – Undermaster <a href="mailto:hfrw@stpaulsschool.org.uk">hfrw@stpaulsschool.org.uk</a></p> <p>Tom Passmore – Head of Boarding <a href="mailto:tjp@stpaulsschool.org.uk">tjp@stpaulsschool.org.uk</a></p>
<b>Designated Teacher for Looked After Children</b>	Nick Hudson <a href="mailto:nch@stpaulsschool.org.uk">nch@stpaulsschool.org.uk</a>
<b>High Master</b>	Sally-Anne Huang <a href="mailto:sah@stpaulsschool.org.uk">sah@stpaulsschool.org.uk</a>

St Paul's Juniors ("SPJ")	
Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")	<p><b>Main DSL for the School</b>  Nick Arnold – SPJ Senior Deputy Head  <a href="mailto:na@stpaulsschool.org.uk">na@stpaulsschool.org.uk</a></p> <p><b>Deputy DSLs</b></p> <p>Nicola Taylor – Safeguarding Coordinator  <a href="mailto:safeguarding@stpaulsschool.org.uk">safeguarding@stpaulsschool.org.uk</a></p> <p>Danielle Dawson – Head of First Years  <a href="mailto:dzd@stpaulsschool.org.uk">dzd@stpaulsschool.org.uk</a></p> <p>Emily Evans – Head of Second Years  <a href="mailto:ebe@stpaulsschool.org.uk">ebe@stpaulsschool.org.uk</a></p> <p>Daniel Kuganathan – -Head of Third Years  <a href="mailto:dsk@stpaulsschool.org.uk">dsk@stpaulsschool.org.uk</a></p> <p>Rory McNish- First Year Teacher  <a href="mailto:rsm@stpaulsschool.org.uk">rsm@stpaulsschool.org.uk</a></p>
Designated Teacher for Looked After Children	Nick Arnold <a href="mailto:na@stpaulsschool.org.uk">na@stpaulsschool.org.uk</a>
Head	Oliver Snowball <a href="mailto:ojs@stpaulsschool.org.uk">ojs@stpaulsschool.org.uk</a>

# St Paul's School Safeguarding Reporting Summary



If you suspect a child is at risk of harm



Call SPS Single Point of Access  
0208 746 5353

Option 3, then Option 1



Designated Safeguarding Lead  
Nick Hudson  
nch@stpaulsschool.org.uk

DSL unavailable?



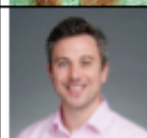
Option 3, followed by:



Option 2  
Nicola Taylor  
safeguarding@stpaulsschool.org.uk



Option 3  
Keri Cloete  
kmc@stpaulsschool.org.uk



Option 4  
James Gilks  
jarg@stpaulsschool.org.uk



Option 5  
Hannah Warner  
hrfw@stpaulsschool.org.uk



Option 6  
Tom Passmore  
tjp@stpaulsschool.org.uk

DSL and Deputy DSL unavailable and  
child at immediate risk?



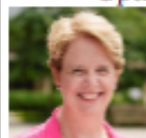
London Borough of Richmond's  
Children's Social Care  
0208 547 5008 or 0208 770 5000 (out  
of hours). In an emergency, dial 999 and  
request the Police.

Concerned about the behaviour of an  
SPS staff member?



Call SPS Single Point of Access  
0208 746 5353

Option 1, then Option 2



High Master  
Sally-Anne Huang  
sah@stpaulsschool.org.uk

High Master unavailable?  
(or if the concern is about her)



Option 1, then Option 3

Chair of Governors  
Richard Cassell  
cassellr@stpaulsschool.org.uk

Chair of Governors unavailable?



Option 1, then Option 4

Ali Palmer  
Deputy Chair of Governors  
palmera@stpaulsschool.org.uk

A concern about the Chair of  
Governors should be reported to the  
LADO on 07774 332675  
or out of hours email  
[LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)  
without informing the HM or Chair of  
Governors.

# St Paul's Juniors Safeguarding Reporting Summary



If you suspect a child is at risk of harm



Call SPS Single Point of Access  
0208 746 5353

Option 2, then Option 1



Designated Safeguarding Lead  
Nick Arnold  
na@stpaulsschool.org.uk

DSL unavailable?



Option 2, followed by:



Option 2  
Nicola Taylor  
safeguarding@stpaulsschool.org.uk



Option 3  
Danielle Dawson  
dzd@stpaulsschool.org.uk



Option 4  
Emily Evans  
ebe@stpaulsschool.org.uk



Option 5  
Daniel Kuganathan  
dsk@stpaulsschool.org.uk



Option 6  
Rory McNish  
rsm@stpaulsschool.org.uk

DSL and DSL unavailable and child at immediate risk?



London Borough of Richmond's  
Children's Social Care  
0208 547 5008 or 0208 770 5000 (out of hours). In an emergency, dial 999 and request the Police.

Concerned about the behaviour of an SPS staff member?



Call SPS Single Point of Access  
0208 746 5353

Option 1, then Option 2

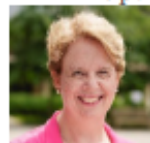


Head  
Oliver Snowball  
ojs@stpaulsschool.org.uk

Head unavailable?  
(or if the concern is about him)



Option 1, then Option 2



High Master  
Sally-Anne Huang  
sah@stpaulsschool.org.uk

High Master unavailable?



Option 1, then Option 3

Richard Cassell  
Chair of Governors  
cassellr@stpaulsschool.org.uk

Chair of Governors unavailable?



Option 1, then Option 4

Ali Palmer  
Deputy Chair of Governors  
palmera@stpaulsschool.org.uk

A concern about the Chair of Governors should be reported to the LADO on 07774 332675 or out of hours email [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk) without informing the HM or Chair of Governors.

### 3. POLICY STATEMENT

This policy applies to St Paul's School and St Paul's Juniors including the St Paul's Boarding Houses ("the School"). This policy is reviewed and updated annually (as a minimum) and is available on the School website or on request by parents.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2024) ("KCSIE")
  - Disqualification under the Childcare Act 2006 (September 2018)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
  -
- Working Together to Safeguard Children (2023) ("WT")
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (Dec 2023)
  - The Prevent Duty: Departmental advice for schools and child care providers (August 2015)
  - The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships and sex education (RSE) and health education (July 2020)
- The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (February 2024)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)

**Note: All references to KCSIE refer to KCSIE September 2024**

This policy also takes into account the procedures and practice of London Borough of Richmond upon Thames local authority as part of the inter-agency safeguarding procedures set up by the Kingston and Richmond Safeguarding Children Partnership.

### 4. CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Situations may arise when the School may need to share information with children's social care without parental consent, for example, where notifying parents could increase the risk to the pupil.

Note: If an allegation involves a member of staff then the pupil's parents should only be informed with the LADO's consent.

#### **4.1 Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children is defined as:

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

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 (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

#### **5. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a DDSL).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

### **5.1 Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **5.2 Early Help**

Any child may benefit from early help, but all staff should be particularly alert to the potential need

for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the school day.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision of a Pupil Referral Unit

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Kingston and Richmond Safeguarding Children Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **5.3 What staff should do if they have concerns about a child**

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "***it could happen here***". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow

this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

#### **5.4 What staff should do if a child is in danger or at risk of harm**

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should consider the immediate arrangements in place for the pupil's safety including whether or not the pupil is safe to return home at the end of the school day. Advice should be sought from Children's Social Care if there is any doubt.

The School's Local Safeguarding Children Executive is Kingston and Richmond Safeguarding Children Partnership. A full copy of their local procedures can be found at <https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/>.

#### **5.5 What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to the SPA team immediately. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the High Master, Head, DSL and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

The Prevent Lead at the School is the DSL.

#### **5.6 What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the Police cases where they discover that an act of FGM appears to have been

carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. While the School is a boys' school, staff occasionally work with girls as part of our outreach programme or when working with girls from St Paul's Girls School. Staff may also become aware of a sibling or family member of a pupil being at risk of FGM.

Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **5.7 What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

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 unexplainable and/or persistent absences from education, 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, signs of assault or unexplained injuries.

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

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

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This includes AI generated material. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

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

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible. The member of staff, following the DfE's confiscation guidance, should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the imagery.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education*

*settings working with children and young people"* (February 2024 when responding to a report of sharing nudes and/or semi-nudes. This will include:

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

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

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

See also section 6.7 for child-on-child procedures around the sharing of nude and semi-nude images.

## **5.9 What staff should do if a child has unexplainable and/or persistent absences from education**

Children who go missing or are absent from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the [School's Attendance Policy](#) and [Missing Pupil Procedure](#), which sets out the procedures to be used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child absent from education is also identified as a welfare and/or safeguarding concern.

The School will report to London Borough of Richmond upon Thames Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

#### **5.10 What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

#### **5.11 What staff should do if a child requires mental health support**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils for example, pupils are encouraged to talk to their Undermaster or the Safeguarding Team if they have any mental health or emotional wellbeing queries. More information can be found in the School's Mental Health and Wellbeing Policy, which is available to all pupils, parents and staff on the school website.

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

#### **5.12 What staff should do if they have safeguarding concerns about another staff member**

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the High Master or Head. Where there are concerns about the High Master or Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the High Master or Head, staff are referred to the procedures regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at the London Borough of Richmond upon Thames local authority (Email: [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk))

### 5.13 What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of '*it could happen here*'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found via the staff handbook page of the SPS intranet. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## 6. ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD-ON-CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child-on-child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child-on-child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

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

Staff will always address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. **Staff will take a zero-tolerance approach to all forms of sexual harassment and will always challenge and report it.**

The School acknowledges that even if there have been no reported cases of child-on-child abuse in

relation to pupils within the School, **such abuse may still be taking place but not being reported**. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

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

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

### **6.1 Children with special educational needs and disabilities (SEND)**

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children (and any vulnerable children), which includes monitoring through the pastoral systems of the School:

- At SPS, the tutor system and tutor group meetings, the Undermasters' record and Child Protection file, as well as the weekly minuted Pupil Welfare and Boarding Management meetings, where the welfare of pupils of concern or in need is actively monitored and reported to the DSL and DDSLs, who advise on actions to take (including managing referrals), support mechanisms to provide and record-keeping.
- At SPJ, the Form Tutors, Heads of Year and Senior Deputy Head regularly meet to monitor the welfare of children who may be particularly vulnerable. There is regular liaison with the Safeguarding Team and the concerns file for the individual pupil is updated as new information arises.
- At both SPS and SPJ School Counsellors are involved to support the child where this is deemed to be appropriate, and the DSL liaises with children's social care regarding involvement of outside support agencies.
- Additional learning support is provided for pupils with SEND. Pupils may also be referred for assessment by an Education Psychologist.

If staff members are unsure, they should always speak to the DSL or DDSL. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

## 6.2 Children in residential settings

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. This is due to the particular nature of boarding accommodation and the increased risks associated with children sharing overnight accommodation.

- The School's Governing Body monitors the effectiveness of the leadership, management and delivery of the boarding and welfare provision in the School and takes appropriate action where necessary.
- The School provides briefings for senior pupils given positions of responsibility over other pupils, on appropriate action to take should they receive any allegations of abuse or have any concerns or suspicions about the behaviour of a member of staff or fellow boarder.
- A Child Protection briefing for School House Prefects is given in their first meeting to outline the roles and responsibilities of the adults they can turn to in and outside school; including the provision and advertisement of how to contact a school-designated 'Independent Person'; a suitably qualified, vetted volunteer, who is not employed by the School, with whom pupils can raise concern.
- The School's Missing Pupil Procedure, known to staff and used in practice, includes procedures for searching for and, if necessary, reporting any boarder missing from School (see separate [Missing Pupil Procedure](#)).
- The School ensures staff and pupils have the knowledge and means of reporting concerns or allegations to the Single Point of Access (SPA) team or Ofsted via their Whistleblowers' Hotline on 0300 123 3155. The hotline is available from 8.00am to 8.00pm. Alternatively, email [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk).
- The School ensures that the welfare of boarders is safeguarded and promoted by the drawing up and effective implementation of a written risk assessment policy for pupil welfare and appropriate action is taken to reduce risks that are identified.
- If an allegation of a child protection nature be made against a member of the Boarding House staff then they would be stood down from boarding duties and their access to boarding facilities revoked whilst an investigation took place.
- If an allegation of a child protection nature be made against a member of staff who lives on or in close proximity to the school site then an appropriate risk assessment would be completed by the DSL and arrangements made for alternative accommodation, as required.

The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

## 6.3 Steps to minimise the risk of child-on-child abuse

The School takes the following steps to minimise the risk of child-on-child abuse.

- Educating all staff, pupils, and parents about this issue. This includes:
  - training staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes (a) Contextual Safeguarding; (b) the identification and classification of specific behaviours; and (c) the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or

teasing. Training includes case studies, which the staff design themselves.

- educating children about the nature and prevalence of child-on-child abuse via PSHE and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. Pupils are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of child-on-child abuse.
- Engaging parents on this issue by:
  - talking about it with parents, both in groups and one to one;
  - asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks; and
  - involving parents in the review of School procedures.
- Ensuring that all child-on-child abuse issues are fed back to the DSL so that they can identify and address any concerning trends and pupils who may be in need of additional support.
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom).
- Working with staff, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community.
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships.
- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and responding to cases of child-on-child abuse promptly and appropriately.
- Actively referring concerns/allegations of child-on-child abuse where necessary to the police and children's social care.
- The school will monitor trends and analyse data with reference to all information recorded on ISAMS.

#### **6.4 Procedures to be followed in the event of child-on-child abuse**

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

- Any report of child-on-child abuse will include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate). The School will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it.
- Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will usually discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The DSL will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.
- If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social

care (if the pupil is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL (or a DDSL), the DSL should be informed as soon as possible that a referral has been made.

- If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL/DDSL without delay so that a course of action can be agreed.
- The DSL/DDSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- The DSL/DDSL will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases, the DSL will consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent (as opposed to inappropriate or problematic), the DSL will contact children's social care immediately. The DSL will discuss the allegations/concerns with children's social care and agree on a course of action, which may include:
  - Manage internally with help from external specialists where appropriate and possible.
  - Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family.
  - Refer child/children to children's social care for a section 17 and/or 47 statutory assessment.
  - Report alleged criminal behaviour to the Police.

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long term.
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL (or DDSL) will refer the situation to children's social care again to determine the appropriate course of action.

## **6.5 Pupil suspension**

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Kingston and Richmond Safeguarding Children

Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of Kingston and Richmond Safeguarding Children Partnership, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Kingston and Richmond Safeguarding Children Partnership and/or the Police as appropriate. The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

## **6.6 Police referrals**

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Kingston and Richmond Safeguarding Children Partnership referral process.

## **6.7 Sharing of nudes and semi-nudes**

The School's approach to sharing of nudes and semi-nudes is that if a member of staff becomes aware of an incident involving the sharing of nudes of or by a child, they should follow the safeguarding procedures set out in this policy and refer to the DSL as soon as possible.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Immediate referral at the initial review stage should be made to Children's Services Local Referral, Intervention and Assessment Service Team/police if:

- the incident involves an adult;
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to SEND);
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or involve violence;
- the imagery involves sexual acts;
- the imagery involves anyone aged 12 or under; or
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the High Master and/or Head, to respond to the

incident without escalation to Children's Services Local Referral, Intervention and Assessment Service Team, or the police.

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances; or
- the children have been involved in incidents relating to sharing nudes and semi-nudes before.

If any of these circumstances are present the situation will be escalated according to our safeguarding procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the School.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (February 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Support will be provided and may include safety planning, counselling provision and other internal or external support as appropriate.

## **6.8 Sexual violence and sexual harassment**

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating

a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.

The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

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

## **6.9 Reflecting on patterns**

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

## **6.10 False, unsubstantiated, unfounded or malicious reports**

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the High Master or the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

## **7. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HIGH MASTER, HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS)**

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Kingston and Richmond Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a child; and/or

- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that **do not** meet the above harms test should be dealt with using the School's procedure for handling **low level concerns** set out at section 9 of this policy.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is, in the case of SPS, the High Master, and in the case of SPJ, the Head . Where the High Master or Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the High Master or Head is the subject of the allegation or concern, the High Master or Head **must not** be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the

criteria or that are made directly to the Police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made clear that this is not a punishment and parents have been consulted; or
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children, if available, should be made.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case.
11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the DSL to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. . Records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should 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 High Master or Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so. If no serious incident report is made, the High Master or Head will record in writing the reason for not doing so.

## **8. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS, CONTRACTED STAFF OR ORGANISATIONS USING SCHOOL PREMISES**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding

concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

When the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purpose of running activities for children (for example, community groups, sports associations or service providers that run extra-curricular activities) then the school will follow its own safeguarding policies and procedures. This includes informing the LADO. The School's own policies will therefore be followed in addition to the policies of the organisation using the premises. This means that, even if the external organisation has made the necessary reports/ referrals, the School will make them as well when they become aware of an incident.

## **9. ARRANGEMENTS FOR DEALING WITH LOW-LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HIGH MASTER, HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)**

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

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

A low-level concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may

look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School's Code of Conduct can be found on the School's website. The aim of the Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Code of Conduct at all times.

Staff must share all concerns with the High Master or Head without delay so they can be recorded and dealt with appropriately, sensitively and in a timely manner. Where a low-level concern is raised about the High Master or Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the High Master or Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded electronically. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them will be retained for the same duration as that individual's personnel file.

Low-level concerns will be retained on the School's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

## **10. SAFER RECRUITMENT**

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. The School will conduct online/social media checks on all shortlisted candidates as part of the recruitment process. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's [Safer Recruitment Policy](#).

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's [Visiting Speakers Policy](#).

## **11. MANAGEMENT OF SAFEGUARDING**

SPS' DSL is Nick Hudson, SPJ's DSL is Nick Arnold, both of whom are members of the leadership team. Nick Hudson is the lead safeguarding practitioner and takes overall executive responsibility for leadership and management of safeguarding policy and procedures. He is also the Prevent Lead for the School.

Nicola Taylor, Keri Cloete, James Gilks, Tom Passmore and Hannah Warner are the DDSLs for SPS. Danielle Dawson, Emily Evans, Nicola Taylor, Daniel Kuganathan and Rory McNish are the DDSLs for SPJ. These are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSLs' contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, staff and pupils should refer to the safeguarding reporting summary sheets (see pages 8 and 9 of the policy), which contains details of the SPA number. A member of the Safeguarding Team (DSL/DDSL) will always be 'on call' throughout any holiday period to assist pupils, parents or staff who make contact outside of term times.

The DSL or DDSL should liaise with Kingston and Richmond Safeguarding Children Partnership and work with other agencies in line with *WT. "NSPCC - When to call the police"* can assist the DSL or DDSL to understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police.

Whilst the High Master and Head should ensure that the policies and procedures adopted are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

## 12. TRAINING

Induction and training are in line with advice from Kingston and Richmond Safeguarding Children Partnership.

### 12.1 All Staff

All new staff will be provided with induction training that includes:

- the safeguarding and child protection policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSLs and the DDSLs;
- the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the [Staff Code of Conduct](#) including the School's [whistleblowing procedure](#) and the [acceptable use of technologies policy](#), staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE* at least (or, for staff that do not work directly with children, Annex A); and
- School leaders and staff who work directly with children will also be required to read Annex B and Part five of *KCSIE*.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with the induction training set out above.

All staff are also required to:

- Read at least Part one of *KCSIE* (or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET days.
- Understand key information contained in Part one (or, for staff that do not work directly with children, Annex A) of *KCSIE*. The School will ensure staff understanding through regular updates at staff meetings, spot checks by the DSL and the safeguarding Governor, quizzes, e-bulletins, referral flow charts, and safeguarding 'credit cards' and more general support from the DSL and DDSLs.
- Receive training in safeguarding and child protection regularly, in line with advice from the Kingston and Richmond Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours (including child-on-child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff meetings.

## **12.2 DSLs**

The DSLs receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Kingston and Richmond Safeguarding Children Partnership's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSLs.

## **13. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Veryan Exelby is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. She is a member of the governing body.

All members of the governing body are trained to at least Level 2 Safeguarding Training and receive additional face-to-face safeguarding training each year. All new governors also receive a safeguarding induction from the DSL or a DDSL.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The School draws on the expertise of staff, including the DSLs, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## **14. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **14.1 Teaching children how to keep safe**

The governing body ensures that all pupils are taught about safeguarding, including online safety,

through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and susceptible adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationships Education and/or Relationships and Sex Education ("RSE").

#### **14.2 Filtering and Monitoring**

It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. As part of this process the School has appropriate filtering and monitoring systems in place and regularly reviews their effectiveness. The school fully complies with the Department for Education's published filtering and monitoring standards.

The School's filtering system is Palo Alto Systems. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images (conduct risk). The School recognises that some children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. It is a recommendation that parents and guardians will install filtering and monitoring software on pupil devices, in accordance with the School's [E-Safety Policy](#).

Further detail of the School's policy and procedures in relation to online safety can be found in the [School's ICT Acceptable Use Policy](#) and [E-Safety Policy](#) which outlines the roles and responsibilities for filtering and monitoring. It also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

#### **14.3 Relationships Education and/or Relationships and Sex Education ("RSE")**

Relationships Education and/or RSE has been compulsory since September 2020. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and/or

RSE.

Relationships Education and/or RSE will form part of the School's PSHE programme.

#### **14.4 Looked after children**

The term Looked After Children has a specific legal meaning based on the Children Act 1989. A child is looked after by a local authority if they have been provided with accommodation for a continuous period of more than 24 Hours or are placed in the care of a local authority.

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL at SPS and the DSL at SPJ are the designated members of staff who have responsibility for their welfare and progress. The School ensures that the designated members of staff receive appropriate training in order to carry out their role.

Further details can be found in the School's [Policy for the Education of Looked-After Children and Previously Looked-After Children](#).

#### **14.5 Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School whether this be 'in person' or 'virtually'. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the School site, will be supervised by a School employee. The School keeps a formal register of visiting speakers retained in line with its [Data Protection Policy](#).

#### **14.6 Arrangements for Secure Premises**

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

**Identification badges:** All Governors and members of staff, including volunteers will receive a photo ID badge with the title 'Governor', 'staff', or '(vetted) volunteer' (as appropriate), which must be clearly displayed and worn at all times whilst on the School premises.

**Visitors' book:** The School keeps a visitors' book 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 or appropriately vetted volunteer. 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 premises.

**Boarding Houses:** All visitors to the Boarding Houses must report to the duty member of staff on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

#### **14.7 Arrangements for Health & Safety, Extended School Activities and Educational Visits**

The School's [Health & Safety](#) and [Educational Visits](#) procedures are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

Where extended school activities are provided by and managed by the School, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site, the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips we will check that effective child protection arrangements are in place. All staff are bound by the school's [Educational Visits Policy](#) when arranging and organising off-site trips. In particular, those responsible for organising exchange visits where pupils are accommodated by host families are required to check host families and get appropriate assurances from partner schools overseas.

In light of learning from the Southbank International School Serious Case Review, the DSL and Educational Visits Coordinator (EVC) closely monitor the conduct of pupils and staff on trips. Pupils and trip leaders and assistant leaders are actively asked for feedback following every trip that involves an overnight stay.

## APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSL).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSLs and DDSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).**

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the SVSH advice.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (SVSH, as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

- The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where: children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse young people e.g. by selling images online or obtaining images to share more widely without consent to publicly shame (often referred to as 'sexploitation')

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is a criminal offence and 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 cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

**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 and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime 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. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing or absent from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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 below child criminal exploitation (CCE) indicators can also be indicators of CSE, as can:

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

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

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance

can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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 – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

**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 exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil

referral units, children's homes and care homes. Children are 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.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- who go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

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

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2021)*".

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a DDSL), 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. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or a DDSL.

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

**So called 'honour based' abuse:** 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.

While the School is a boys' school, staff occasionally work with girls as part of our outreach programme or when working with girls from St Paul's Girls School. Staff may also become aware of a sibling or family member of a pupil being at risk of so called 'honour based' abuse.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil’s return.
- A pupil is reluctant to undergo medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or DDSL) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care.**

There is a statutory duty on teachers to personally report 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 under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School’s local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*.

**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 can be 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. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage and, Multi-agency statutory guidance for dealing with forced marriage. Both can be found at The right to choose: government guidance on forced marriage ([www.gov.uk](http://www.gov.uk)).

School staff can also contact the Forced Marriage Unit if they need advice or information: Contact:

020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

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

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. A new definition of extremism was published by the Government in March 2024. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. *Negate or destroy the fundamental rights and freedoms of others; or*
2. *Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*
3. *Intentionally create a permissive environment for others to achieve the results in (1) or (2).*

Simply put, extremism is vocal or active opposition to fundamental British values.. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility . Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider, where appropriate, to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse. For any incidents involving radicalisation, for example those who are currently receiving support through the 'Channel' programme or who have been previously referred due to concerns around radicalisation, then the DSL should share this information with the new school or college.

Channel is a voluntary, confidential support programme which focuses on providing support an early

stage to people who are identified as being susceptible to being drawn into terrorism. An individual will be required to provide their consent before any support is provided.

**Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:** Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

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

**Lesbian, gay, bisexual or trans ("LGBT"):** A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Gender questioning children:** When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The

government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse 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 should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to local authority children's social care where a child has been harmed or is at risk of harm.

**Children who are absent from education:** A child absent from School, particularly repeatedly and/or for prolonged periods is a potential indicator of a range of safeguarding issues including abuse, neglect, exploitation, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'- based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the School's [Missing Pupil Procedure](#). All unexplained absences will be followed up in accordance with this Missing Pupil Procedure.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education;  
and
- b) follow up with any child who might be in danger of not receiving an education and who might

be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. Please see the School's [Attendance Policy](#) for further details.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

**Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:  
[www.actionagainstabduction.org](http://www.actionagainstabduction.org)

**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

**Children with family members in prison:** Approximately 200,000 children in England and Wales have

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