



## **Safeguarding and Child Protection Policy Whole School Policy including EYFS**

*“Twickenham Preparatory School seeks to create a safe, caring and happy Christian environment in which all pupils are valued and can thrive personally, socially and academically.”*

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## Section 1: Important Contact Details

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### 1.1. School Contact Details

The Board of Governors have appointed the Head of Pre Prep as the Designated Safeguarding Lead ('DSL'). The Senior Teacher deputises for the Head of Pre Prep, but the ultimate lead responsibility for safeguarding and child protection remains with the DSL.

The DSL and/or the Deputy will be always be available during school hours. The DSL or the Deputy will be available out of school hours.

In the Early Years Foundation Stage (EYFS) the Designated Safeguarding Lead who will liaise with the local statutory authorities is the Head of Pre-Prep. Staff working in EYFS with concerns about child protection issues must contact the Designated Safeguarding Lead regarding their concerns.

Further details regarding the role of the DSLs can be found in **Appendix 1**.

The Board of Governors ensures that the School has a nominated Governor with leadership responsibility for safeguarding arrangements.

#### Contact details are set out below:

Designated Safeguarding Lead	Mrs Barbara Barnes School Office: 020 8979 6216 (Ext 208) Mobile: 07949 038703 Email: <a href="mailto:bbarnes@twickenhamprep.co.uk">bbarnes@twickenhamprep.co.uk</a>
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Deputy Designated Safeguarding Lead	Mrs Amanda Hepburn School Office: 020 8979 6216 Mobile: 07947 935003 Email: <a href="mailto:ahepburn@twickenhamprep.co.uk">ahepburn@twickenhamprep.co.uk</a>
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#### For any allegation of abuse against a member of staff or volunteer:

Headmaster:	Mr David Malam School Office: 020 8979 6216 Email: <a href="mailto:head@twickenhamprep.co.uk">head@twickenhamprep.co.uk</a>
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#### For any allegation of abuse against the Headmaster:

Chair of the Governors:	Mr Harry Bates School Office: 020 8979 6216 Email: <a href="mailto:hbates@twickenhamprep.co.uk">hbates@twickenhamprep.co.uk</a>
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## **Governor with responsibility for safeguarding:**

Mrs Ruby Jones: School Office: 020 8979 6216  
Email: [rjones@twickenhamprep.co.uk](mailto:rjones@twickenhamprep.co.uk)

### **1.2. Key Contact Details**

All referrals for safeguarding issues, including those related to radicalisation, must be made to the SPA in the first instance.

**Richmond Single Point of Access (SPA):** 020 8547 5008 8am – 6pm  
or  
020 8770 5000 (out of  
hours/weekends)  
[spa@richmond.gov.uk](mailto:spa@richmond.gov.uk)

Full local procedures may be found on the following website:

[http://www.richmond.gov.uk/local\\_safeguarding\\_children\\_board](http://www.richmond.gov.uk/local_safeguarding_children_board)

**Local Authority Designated Officer (LADO): Julie Fisher/Alice Stott**  
020 8487 5492  
0777 433 2675  
[lado@achievingforchildren.org.uk](mailto:lado@achievingforchildren.org.uk)

#### **Local Safeguarding Children Board (LSCB)**

Richmond upon Thames  
1<sup>st</sup> Floor Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ  
Tel: 020 8831 6323  
[lscb-support@achievingforchildren.org.uk](mailto:lscb-support@achievingforchildren.org.uk)

**LSCB Independent Chair:** Deborah Lightfoot  
[deborah.lightfoot@richmond.gov.uk](mailto:deborah.lightfoot@richmond.gov.uk)

#### **List of Initial Response Teams' Contact Details of Children's Services (Social Care) covering the catchment of our pupils:**

Ashford	01932 794479	Chiswick/Hounslow	020 8583 3400
Elmbridge/Weybridge	0300 200 1006	Kingston	020 8547 5888

#### **The Disclosure and Barring Service (DBS) – Barring Referrals**

PO Box 181  
Darlington  
DL1 9FA  
Tel: 01325 953 795  
[dbsdspatch@dbb.qsi.gov.uk](mailto:dbsdspatch@dbb.qsi.gov.uk)

## **OFSTED Safeguarding Children**

Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm)

Email: [Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

**NSPCC/Government Child Abuse Whistleblowing Helpline: 0800 028 0285**

**For Prevent matters, as stated above, all referral must be made to the SPA in the first instance but other contact details are:**

- **Police emergency contact number: 999**
- **Local police non-emergency contact number: 101**
- **Non-emergency DfE advice (Due diligence and counter extremism group)**
  - Tel: 020 7340 7264
  - Email: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
- **Anti-terrorist hotline: 0800 789 321**

## **Contacts for Pupils**

**Childline:** 0800 1111

**NSPCC:** 0808 800 5000

## Section 2: Introduction

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### 2.1. Guidelines

These guidelines have regard to statutory guidance Keeping Children Safe in Education 2018, Working Together to Safeguard Children 2018, Disqualification under the Childcare Act 2006 (Updated Aug 2018) and Prevent Duty Guidance for England and Wales 2015.

This policy has been written with reference to the Education (Independent School Standards, England) Regulations 2014 (as amended) and the Statutory Framework for the Early Years Foundation Stage. It is in accordance with Richmond Upon Thames Local Education Authority agreed interagency procedures.

### 2.2. Introduction

The safety and well-being of all our pupils at Twickenham Preparatory School is our highest priority. **This is paramount above all else.** This is a vital responsibility which involves all members of the school community. This policy applies to all staff, governors and volunteers working with pupils whether on School premises or away from the School, for example at an activity centre or on a school trip. This policy is made available to parents via the school website and is also included in the annual information booklet issued to parents. This policy can be made available in large print or other accessible format if required.

### 2.3. Our Core Safeguarding Principles are:

- The welfare of the pupil is paramount; it is the School's responsibility to safeguard and promote the welfare of pupils
- To be alert to the signs of abuse and neglect and follow our procedures to ensure that pupils receive effective support and protection
- All pupils, whatever their age, culture, disability, gender, language, racial origin, religious beliefs or sexual identity, have the right to protection from abuse
- Ensure pupils know that there are adults in the School whom they can approach if they are worried
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Opportunities will be provided in the Personal, Social & Health Education (PSHE) curriculum for pupils to develop the skills they need to recognise and stay safe from abuse. Pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, within a broad and balanced curriculum
- Pupils who are and feel safe make more successful learners
- Corporal punishment is never used nor is its use ever threatened within the School
- All staff, whether teaching or non-teaching, have a responsibility to report concerns
- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to and valued.

## 2.4. Statement of Intent

The Governing Body ensures that the School has:

- A Designated Safeguarding Lead and Deputy Safeguarding Lead for safeguarding and child protection who is a member of the Senior Leadership Team (SLT) and has received appropriate training and support for this role. Training in child protection and inter-agency working must be updated every two years by this person
- A nominated Governor with leadership responsibility for safeguarding arrangements to liaise with the Designated Safeguarding Lead to ensure that the Child Protection Policy is updated and reviewed on an annual basis
- A nominated Governor responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headmaster
- Procedures for dealing with allegations of abuse made against members of staff
- Child protection policies and procedures which are reviewed annually by the Governing Body and made available to parents
- Safer recruitment procedures in line with national guidance
- A training strategy to ensure all staff, including the Headmaster and Governors, receive child protection training, with refresher training, at regular intervals in accordance with the LSCB requirements
- Appropriate staff training in place for General Data Protection Regulations (GDPR) and Data Protection Act 2018.

The School will:

- Ensure that every member of staff and the members of the governing body know the name of the Designated Safeguarding Lead responsible for child protection and their role
- Ensure that all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring their concerns to the Designated Safeguarding Lead
- Ensure that parents have an understanding of the responsibility placed on the School and staff for child protection
- Ensure that children's social care services are notified if there is an unexplained absence of more than two days of a child who is on the child protection plan
- Keep written records of concern about pupils, even where there is no need to refer the matter immediately
- Ensure all records are kept securely and in locked locations
- Develop and follow procedures where an allegation is made against a member of staff or volunteer
- Ensure safe recruitment practices are always followed (see TPS Recruitment & Selection Policy)
- Report to the Disclosure and Barring Service as soon as possible, if the criteria are met, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children
- Contact the Borough Child Protection Team within 24 hours of an allegation of abuse being made

- Ensure appropriate safety checks are carried out on staff from other agencies who are employed in the School
- Ensure any deficiencies or weaknesses in child protection arrangements are remedied without delay
- Continue to work in partnership with the LSCB and follow relevant local arrangements until new multiagency safeguarding arrangements are in place
- Continue to work proactively in information sharing with local agencies as and when required.

## Section 3: Reporting Concerns

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### 3.1. Reporting Concerns

If staff have any concerns about a child's welfare, they should act on them immediately and report their concerns without delay. It is not a staff member's responsibility to investigate or decide whether a child has been abused.

### 3.2. Reporting Concerns About a Child

When adults in the School have a concern about a child or young person (as opposed to a child being in immediate danger) they must:

- Complete a school record of concern form in writing immediately
- Record of concern forms can also be located in the Staffroom file or on the Reference Network Drive (R), under Staff Forms: Safeguarding Forms
- Provide the form to the DSL and discuss their concerns as soon as possible (if the DSL or the Deputy DSL are not available, staff should speak to a member of the SLT and/or take advice from children's social care)
- Agree a course of action
- Staff are permitted to make a direct referral to children's social care.

**See Appendix 2** for further information

### 3.3. Reporting a Threat of Immediate Danger and/or Risk of Harm to a Child

If, at any point, a child is in immediate danger or is at risk of serious harm, a referral will be made to children's social care and/or the police immediately. Anybody can make a referral. If the referral is not made by the DSL, the DSL must be informed as soon as possible that a referral has been made. If the child's situation does not appear to be improving the staff member with concerns must press for re-consideration.

**See Appendix 2** for further information.

### 3.4. Reporting Concerns About an Adult

The School recognises the possibility that adults working in the School may harm children. Concerns to be reported as follows:

- Concerns about the conduct of other adults in the School to be taken to the Headmaster without delay (or where that is not possible, to the Designated Safeguarding Lead)
- Concerns about the Headmaster to be taken to the Chairman of Governors, Mr Harry Bates, who can be contacted via email: [hbates@twickenhamprep.co.uk](mailto:hbates@twickenhamprep.co.uk)
- Concerns about the proprietors of the School (Board of Governors), to be taken to Local Authority Designated Officer (LADO) without delay.

The School recognises that it has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence



- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

A referral will be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from working in regulated activity, which could include being suspended, or is redeployed to work that is not regulated activity.

### **3.5. Reporting Concerns about Safeguarding Practices Within the School (Whistleblowing)**

Where there are concerns about the way that safeguarding is carried out in the School, staff must refer to the Whistleblowing Policy (see Employee Handbook).

A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a **Whistleblowing Advice Line** on behalf of the Government, the number is 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **3.6. Key Points to Remember for Taking Action are:**

- If a child is at immediate risk of serious harm a referral must be made to children's social care or the police immediately
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Seek support for yourself if you are distressed.

### **3.7. Referring a Concern Externally**

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in all proper circumstances will be referred to an external agency such as the children's social care services at the Local Authority, the child protection unit of the police or the NSPCC, without investigation within the School.

In each of these cases the matter will be referred to children's social care services and in the case of allegations against a member of staff or a volunteer to the Local Authority Designated Officer (LADO) (Julie Fisher / Alice Stott 020 8487 5492, [lado@achievingforchildren.org.uk](mailto:lado@achievingforchildren.org.uk)) and that any doubts or concerns over apparently borderline cases will be discussed informally with children's social care initially on a "no names" basis.

**See Appendix 2** for further information.

### **3.8. If a Child Discloses Information to You**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults or they may believe, or have been told that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you
- Give reassuring nods or words of comfort –“I’m so sorry this has happened”, “I want to help”, “this isn’t your fault”, “you are doing the right thing”
- Do not be afraid of silences
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think
- At an appropriate time tell the child that in order to help them you must pass the information on
- Do not offer any physical touch or comfort as it may be anything but comforting to a child who has been abused
- Avoid admonishing the child for not disclosing earlier
- Tell the child what will happen next. The child may agree to go with you to see the Designated Safeguarding Lead
- Report verbally to the Designated Safeguarding Lead
- Write up your conversation as soon as possible on the Record of Concern Form and hand it to the Designated Safeguarding Lead
- Seek support if you feel distressed

### **3.9. Incidents that must be Reported/Recorded**

If any of the following occur you must report this immediately to another colleague and record the incident.

- If you accidentally hurt a pupil
- If a pupil seems particularly distressed
- If a pupil appears to be sexually aroused by your actions
- If a pupil misunderstands or misinterprets something you have done

### **3.10. Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider

environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children's social care assessments should consider such factors so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

### **3.11. Information Sharing**

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 and GDPR places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm.

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

The governing body ensures that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. If in any doubt about sharing information, staff should speak to the DSL or the deputy DSL.

Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent the School sharing where there are real safeguarding concerns.

The School will use its judgement when making decisions on what information to share and will apply the principles set out below. The most important consideration is whether sharing information is likely to safeguard and protect a child.

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure
- Record

For further information see 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers'.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)



## Section 4: Managing Allegations

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### 4.1. Allegations Against a Member of Staff, Headmaster, Governor or Volunteer

**4.1.1 Staff:** When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, the School must accept that some adults do pose a serious risk to children's welfare and safety and must act on every allegation made.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended 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.

If a child or parent makes a complaint of abuse against a member of staff, the person receiving the complaint must take it seriously and immediately inform the Headmaster.

If a member of staff suspects that a pupil may have been abused by another member of staff at school or elsewhere they must also immediately inform the Headmaster. The Headmaster will make a record of the concerns including a note of anyone else who witnessed the incident or allegation.

In such circumstances the Headmaster will not investigate the allegation or take written or detailed statements. All allegations will be discussed with the LADO before further action is taken.

The accused person will be informed of the allegation as soon as possible after the LADO has been consulted. Appropriate support will be provided and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate.

The School recognises its statutory duty to consider referral of cases involving serious professional misconduct to the Teaching Regulation Agency (TRA). In the event that the School dismisses a teacher for misconduct, or would have dismissed them had they not resigned first, the School will consider whether to refer the case to TRA.

The School also recognises its statutory duty to make referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.

**4.1.2 Headmaster or Governor:** Any allegation against the Headmaster or a Governor must be directed to the Chairman of Governors, Mr Harry Bates. Again, the allegation will be discussed immediately with the LADO before further action is taken.

**4.1.3 Chairman of Governors:** Any allegation against the Chairman of Governors must be discussed immediately with the LADO.

**4.1.4 Volunteer:** Allegations against a volunteer must be immediately reported to the Headmaster or in his absence to the Chairman of Governors. Where appropriate, the Headmaster will consult with the Designated Safeguarding Lead. The allegation will be discussed immediately with the LADO before further action is taken.

#### **4.2. Allegation Against a Pupil**

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's Policy on Behaviour and Discipline will apply. The School will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. 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 children's social care, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

#### **4.3. Unfounded or Malicious Allegations**

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline Policy.

Where a parent has made a deliberately invented or malicious allegation, the Headmaster will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

## Section 5: Safeguarding Information

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### 5.1. Specific Safeguarding Issues

Keeping Children Safe in Education (2018) also acknowledges the following as specific safeguarding issues:

- Bullying including cyberbullying
- Children missing from education (CME)
- Children missing from home or care
- Child sexual exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence / violence against women and girls
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

Further detail regarding these areas can be found in **Appendix 3**.

### 5.2. Pupils with Special Educational Needs (SEN) and/or Disabilities

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Difficulties may arise in overcoming communication barriers

The School identifies pupils who might need more support to be kept safe or to keep themselves safe.

Further information regarding the additional support provided to pupils with SEN/D can be found in the School's Special Educational Needs and Disability Policy.

### 5.3. E-Safety

The use of technology is a source of education, communication and entertainment. However, it has also become a significant component of many safeguarding issues, providing platforms that facilitates harm to children.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views
- **Contact:** being subjected to harmful interaction with other users; for example commercial advertising as well as adults posing as children or young adults
- **Conduct:** personal online behaviour that increase the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying

Pupils receive guidance, education and training on safety through our PSHE programme. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures, and they can be escalated to safeguarding concerns.

Pupils are not permitted access to mobile phones during the school day. Pupils in Year 6-8 who bring mobile phones to school, must hand the phone in to the School Office on arrival. Phones may only be collected when the pupils leave the School.

The School has also put in place appropriate filters and monitoring systems to limit children's exposure to the above risks, while being mindful not to place unnecessary restrictions on their learning. Please refer to the School's E-Safety Policy and Anti-Bullying Policy for further information.

#### **5.4. Mobile Phones and Cameras**

Personal mobile phones, cameras and video recording equipment cannot be used when in the presence of children on school premises. All mobile phones must be stored securely out of reach within the setting during contact time with children. (This includes staff, visitors, parents and volunteers).

Staff have permission to use their phones in emergencies when offsite on field trips or sporting fixtures.

Personal calls may be made in non-contact time but not within the teaching areas.

Personal mobiles, cameras or video recorders should not be used to record classroom activities. School equipment only should be used.

In the case of school productions and sports day, parents/carers are permitted to take photographs/video footage of *their own child* in accordance with school protocols but we strongly advise against the publication of any such photographs on social networking sites. Most Pre-Prep events will be videoed / photographed by school staff and then made available to parents.



## Section 6: Safeguarding Training

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### 6.1. Safeguarding & Child Protection Training

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with judgements about the appropriate action to take. Staff receive the following training in child protection:

- **DSLs:** attend training every two years; and in addition to formal training, their knowledge and skills are refreshed at regular intervals, at least annually.
- **All other staff:** receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- **Safer Recruitment training** is available to all relevant staff and governors who are involved in the recruitment process (see TPS Safer Recruitment Policy & Procedures).

### 6.2. Induction

All staff, including temporary staff and volunteers, will be provided with induction training that includes:

- Safeguarding & Child Protection Policy
- Behaviour & Discipline Policy
- Code of Conduct for Staff
- Safeguarding response to children who go missing in education
- Whistleblowing Policy
- The identity and contact details of the DSL and his/her Deputy
- A copy of Part 1 of Keeping Children Safe in Education (2018), and school leaders and staff that work directly with children also read Annex A

## Section 7: Good Practice Guidelines

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### 7.1. Good Practice Guidelines

All staff must demonstrate exemplary behaviour in order to protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate:

- Work in an open environment, avoiding private or unobserved situations wherever possible/practical and encourage open communication
- Treat all pupils with equal respect and dignity
- Always put the welfare of each pupil first
- Maintain a safe and appropriate distance from pupils
- Be an excellent role model and do not smoke or drink alcohol in the company of pupils
- Give enthusiastic and constructive feedback rather than negative criticism
- Staff speaking to a pupil and being concerned about possible abuse must make it clear that confidentiality cannot be promised to a pupil
- Staff must avoid asking leading questions when speaking to a pupil where the pupil is reporting on an incident that could be interpreted as abuse

### 7.2. Practices to be Avoided

Staff are required to familiarise themselves with the guidance for physical restraint of pupils given in the Staff Code of Conduct (TPS Reference Drive: R:Policies).

Staff must avoid spending excessive time alone with pupils away from others. If a case arises where this is unavoidable actions wherever possible must be with the full knowledge of others.

### 7.3. Practices Never to be Sanctioned

- Engaging in rough physical or sexually provocative games
- Sharing a room with a child on an off-site visit
- Allowing or engaging in any form of inappropriate touching
- Allowing pupils to use inappropriate language unchallenged
- Making sexually suggestive comments to a pupil, even in fun
- Deliberately reducing a pupil to tears as a form of control
- Allowing allegations made by a pupil to go unchallenged, unrecorded or not acted upon
- Inviting or allowing pupils to stay with you at your home unsupervised
- Carrying out actions of a personal nature for a pupil which they could do themselves. It may sometimes be necessary for staff to do things of a personal nature for pupils. These tasks must only be carried out with the full understanding and consent of parents. Avoid taking on the responsibility for tasks for which you are not appropriately trained
- Communicating electronically (e.g. by 'phone or computer) with pupils unless clearly sanctioned by the School

## **Appendix 1: The Role and Responsibilities of the DSL**

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The Designated Safeguarding Lead is responsible for safeguarding and child protection at the School. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from School staff or any others from outside the School
- Work with external agencies and professionals on matter of safety and safeguarding
- Undertake training
- Raise awareness of safeguarding and child protection amongst the staff and parents
- Ensure that a pupil's child protection file is transferred to the pupil's new school as soon as possible
- Consider if appropriate to share child protection information with a new school in advance of the pupil leaving
- Preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

The School ensures that the DSL:

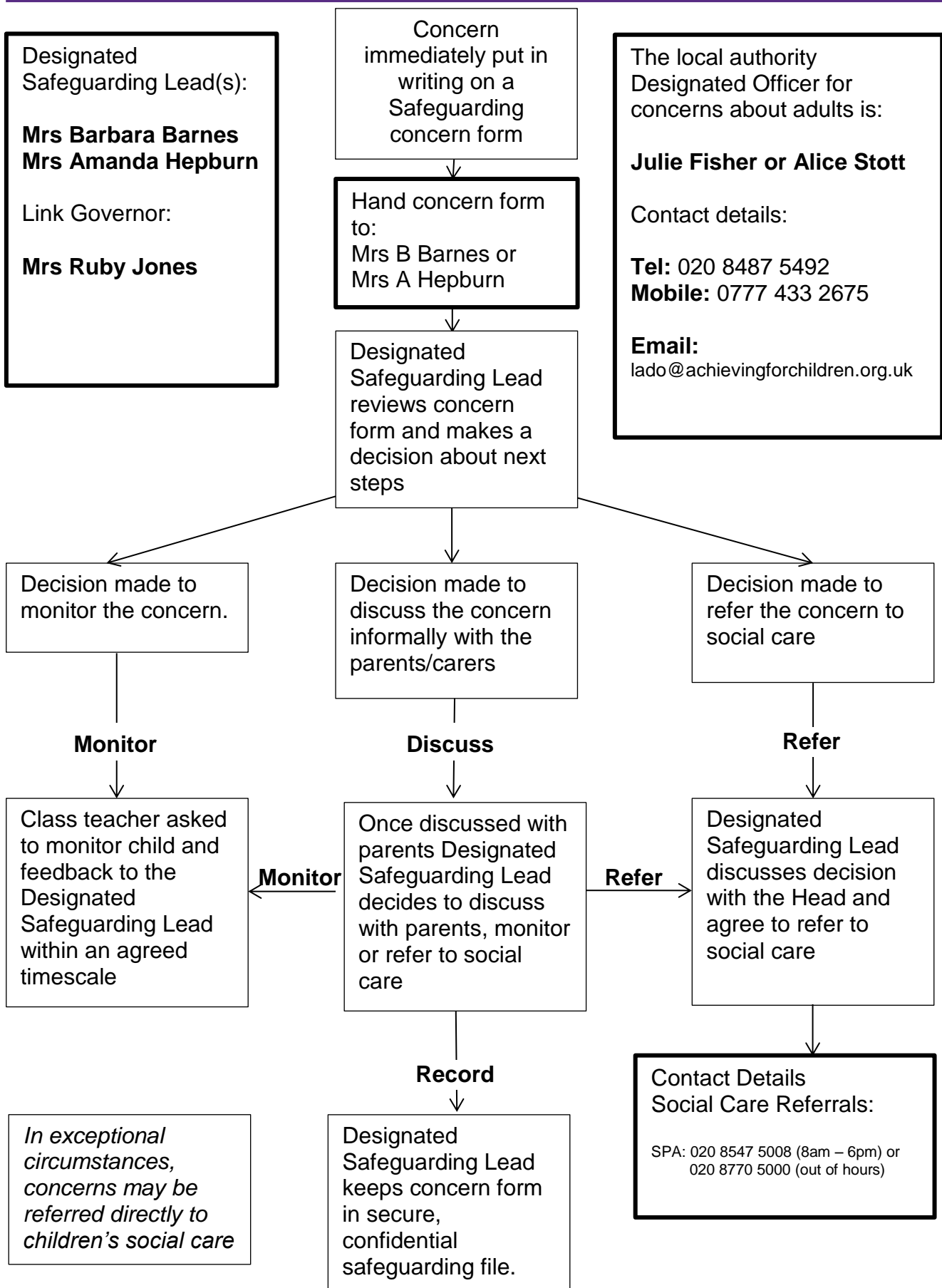
- Is appropriately trained
- Acts as a source of support and expertise to the school community
- Has an understanding of Local Safeguarding Children Board (LSCB) procedures
- Keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely
- Refers cases of suspected neglect and/or abuse to children's social care or police
- Notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- Ensures that when a child with a child protection plan leaves the School, their information is passed to their new school and the child's social worker is informed
- Attends child protection courses
- Co-ordinates the School's contribution to child protection plans
- Develops links with relevant statutory and voluntary agencies
- Ensures that all staff have read the Safeguarding and Child Protection Policy
- Keeps and maintains records of staff and governor training on child protection and safer recruitment procedures
- Ensures that the Safeguarding and Child Protection Policy is reviewed annually at a meeting of the Governing Body
- Liaises with the nominated Governor
- Keeps a record of staff attendance at child protection training
- Makes this policy available to parents

The Deputy Designated Safeguarding Lead is appropriately trained and in the absence of the Designated Safeguarding Lead carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of long-term absence of the Designated Safeguarding Lead, the Deputy will assume all of the functions above.

The DSLs attend training in child protection and interagency working every two years, and in addition to formal training, their knowledge and skills are refreshed at regular intervals (annually as a minimum).

**The DSL and Deputy DSL are most likely to have a complete safeguarding picture and will be the most appropriate person to advise on the response to safeguarding concerns.**

## Appendix 2: Flow Chart for Raising Safeguarding Concerns about a Child



## Appendix 3: Specific Safeguarding Issues

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### 1. Recognising Abuse

To ensure that pupils are protected from harm, an understanding of what types of behaviour constitute abuse or neglect is required. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives within reach of an unattended toddler. 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). They may be abused by an adult or adults or another child or children. Part one of Keeping Children Safe in Education (2018) defines the following types of abuse.

#### 1.1. 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. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### 1.2. 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.

#### 1.3. Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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.

#### 1.4. 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.

## **2. Indicators of Abuse and What you Might See**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed or their abuser has threatened further violence or trauma if they "tell". Staff are required to familiarise themselves with the range of behavioural indicators of abuse and report any concerns to the designated person.

The government guidance 'What to do if you're worried a child is being abused; advice for practitioners' provides detailed advice on the signs of abuse and neglect to look out for and the action to take if you think a child is being abused or neglected.

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy to withdrawn
- Challenge authority
- Become disinterested in their school work
- Be constantly tired or pre-occupied
- Be wary of physical contact
- Be particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely in isolation provide conclusive evidence of abuse. They must be viewed as part of a jigsaw. What is important is that you report your concerns. You do not need "absolute proof" that the child is at risk.

### **3. Early Help**

Any child may benefit from early help, but all school staff should be particularly alert to the potential needs for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- 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
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child.

If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

### **4. Children Missing Education (CME)**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the school's Children Missing from Education & Collection Procedures.

The School monitors attendance carefully and addresses poor or irregular attendance without delay.

The School will always follow up with parents/carers when pupils are not at school. The School will ensure that it holds a minimum of two up to date contact numbers for each pupil. Parents should remember to update the School as soon as possible if numbers changes.

In response to the guidance in Keeping Children Safe in Education (2018), the School has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage



- Procedures to inform the local authority when the School plans to take pupils off-roll when they:
  - Leave school to be home educated
  - Move away from the school's location
  - Remain medically unfit beyond compulsory school age
  - Are in custody for four months or more (and will not return to school afterwards); or
  - Are permanently excluded.

The School will ensure that pupils who are expected to attend the School, but fail to take up the place will be referred to the local authority.

When a pupil leaves, the School will record the name of the pupil's new School and their expected start date.

For more information refer to the School's Children Missing from Education & Collection Policy, available on the Reference Drive (R).

## 5. Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Staff must also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

- **Inappropriate Relationships**  
Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- **Boyfriend/Girlfriend**  
Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.
- **Organised Exploitation and Trafficking**  
Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Staff must ensure they are aware of the key indicators of children being sexually exploited which can include:

- Acquisition of money, clothes, mobile phones etc, without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicious of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity.

Not all children and young people with these vulnerabilities will experience child exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present.

More information can be found in:

Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE 2017)

## **6. So-Called Honour-Based Violence (HBV)**

So-called HBV 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. All forms of so called HBV are abuse (regardless of the motivation) and must be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **6.1. Indicators**

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/70188/forced-marriage-guidelines\\_English.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/70188/forced-marriage-guidelines_English.pdf)

### **6.2. Female Genital Mutilation (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals must note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity must always be shown when approaching the subject.

#### **6.2.1. Risk factors for FGM include:**

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHEE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

#### **6.2.2. Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (see Section 2.3 of the Multi agency statutory guidance on FGM for further details), especially before the summer holidays, or parents who wish to withdraw their children from learning about FGM.

### **6.2.3. Indications that FGM may have already taken place may include:**

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

### **6.2.4. FGM Mandatory Reporting Duty**

All staff should speak to the DSL (or deputy) with regard to any concerns about FGM. However, there is a specific legal duty on teachers.

If a teacher, in the course of their work in the profession, discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must personally report this to the police.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they must not be examining pupils.

Unless the teacher has a good reason not to, they must still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate.

This duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases teachers should follow local safeguarding procedures.

## **7. Radicalisation and the Prevent Duty**

As part of the Counter Terrorism and Security Act 2015, the School has a duty to 'prevent people from being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that pupils and young people are developing extremist views or show signs of becoming radicalized, they must discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

The School uses the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

The School are committed to ensuring that pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the School's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

The School has adopted the Government's Definitions for the purposes of compliance with the Prevent duty:

**Extremism:** "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

**Radicalisation:** "the process by which a person comes to support terrorism and forms of extremism leading to terrorism."

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff must be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

*Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)* notes the following:

#### Identifying Vulnerable Individuals

36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include:

- Peer pressure
- Influence from other people or via the internet
- Bullying
- Crime against them or their involvement in crime
- Anti-social behaviour
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity
- Personal or political grievances

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group

- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with group/cause/ideology

52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- Using insulting or derogatory names or labels for another group
- Speaking about the imminence of harm from the other group and the importance of action now
- Expressing attitudes that justify offending on behalf of the group, cause or ideology
- Condoning or supporting violence or harm towards others
- Plotting or conspiring with others

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The DfE's briefing note *The use of social media for on-line radicalisation (2015)* includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

## **8. Child Criminal Exploitation: County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be

due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## 9. Peer on Peer Abuse

Staff must be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to:

- Bullying (including cyber bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery)
- Initiation-type violence and rituals.

Pupils are regularly taught about acceptable behaviour and how the School deals with poor behaviour. Further information regarding the School's strategy for managing peer on peer abuse and supporting the victims of peer on peer abuse, can be found in the School's Anti-Bullying Policy.

### 9.1. Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEN and/or disabilities and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

In cases of reports of sexual violence and sexual harassment the School will refer to guidance issued by the DfE 'Sexual violence and sexual harassment between children in schools and colleges' May 2018.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

## **9.2. Sexting**

The School's E-Safety Policy outlines the School's approach to sexting. If staff become aware of a sexting incident then they must report it to the DSL. In cases of 'sexting' the School follows guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

## **10. Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer.

A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or become involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However, it must be clear to the School who has parental responsibility.

School staff must notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to



inform the Local Authority. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, the School will take steps to verify the relationship of the adults to the child who is being registered.

#### **11. Children with Family Members in Prison**

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

## **Appendix 4: Early Years Foundation Stage**

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The School has additional safeguarding and child protection responsibilities in EYFS. This is in the case of an allegation of serious harm involving pupils within the setting. Under these circumstances the normal child protection procedures would follow but in addition the School would inform Ofsted (via ISI office) of any allegations of serious harm within 14 days of the allegation.

## Appendix 5: Table of Substantive Changes from June 2017

<b>Where</b>	<b>Change</b>	<b>Date</b>
Table of Contents	Reflecting changes in document	03/09/2018
Whole document	Update all references to KCSIE are changed to 2018	03/09/2018
Paragraph 1.2	Revised LADO and contact details	03/09/2018
Paragraph 2.4	Incorporating GDPR training for staff	03/09/2018
Paragraph 2.4	Highlighting information sharing with local agencies	03/09/2018
Paragraph 3.1	Staff to report safeguarding concerns without delay	03/09/2018
Paragraph 3.2	What to do if the DSL or deputy is not available	03/09/2018
Paragraph 3.4	Legal duty of the school to report to the DBS anyone who has harmed or poses a risk of harm to a child	03/09/2018
Paragraph 3.7	Revised LADO contact and details	03/09/2018
Paragraph 3.10	Insertion of new section on contextual safeguarding	03/09/2018
Paragraph 3.11	Insertion of new section on Information Sharing	03/09/2018
Paragraph 4.1.1	Clarification on suspension in cases of allegations made against staff	03/09/2018
Paragraph 4.1.1	Deletion of reference to NCTL – replaced by Teaching Regulation Agency (TRA)	03/09/2018
Paragraph 4.2	Further detail on managing allegations against a pupil	03/09/2018
Paragraph 5.3	Update to online safety section and clarification on pupil mobile phone use at school	03/09/2018
Paragraph 6.2	Update to staff safeguarding induction	03/09/2018
Appendix 1	Update to role and responsibilities of DSL in relation to pupil records	03/09/2018
Appendix 2	Revised LADO and contact details	03/09/2018
Appendix 3 – Clause 3	Insertion of new section on Early Help	03/09/2018
Appendix 3 Clause 4	Update to Children Missing in Education (CME) – minimum of 2 contact numbers for parents/carers	03/09/2018
Appendix 3 Clause 6.2.4	Update to FGM Mandatory Reporting Duty – clarification regarding the legal duty on teachers	03/09/2018
Appendix 3 Clause 7	Updated wording relating to radicalisation and the prevent duty	03/09/2018
Appendix 3 Clause 8	Insertion of new section on Child Criminal Exploitation – County Lines	03/09/2018
Appendix 3 Clause 9	Update to Peer on Peer Abuse – addition to examples of peer on peer abuse	03/09/2018
Appendix 3 Clause 9.1	Insertion of new section on Sexual Violence and Sexual Harassment between children in school.	03/09/2018
Appendix 3 Clause 9.2	Update to Sexting Section – new guidance from UK Council for Child Internet Safety in 2017	03/09/2018
Appendix 3 Clause 10	New definition of private foster carers	03/09/2018
Appendix 3 Clause 11	Insertion of new section on children with family members in prison	03/09/2018