



ABINGDON
HOUSE SCHOOL

Safeguarding Policy

Responsible Person: Designated Safeguarding Lead

Last Review Date: August 2025

Next Review Date: August 2026

To be reviewed alongside [Preventing Extremism and Radicalisation Safeguarding Policy](#)

In all AHS Policies, unless the specific context requires otherwise, the word “parent” imports the meaning parent, guardian, carer or any other person in whom is vested the legal duties and responsibilities of a child’s primary caregiver.

If you require a copy of this document in large print, braille or audio format, please contact the AHS Main Office.

AHS employs the services of the following consulting companies to ensure compliance is met and best practice is implemented:

Peninsula HR Online
Peninsula Business Safe (Health and Safety)
Care Check (DBS)
Educare (online CPD)

Introduction

Abingdon House School is owned and operated by Cavendish Education, the Proprietary Body also known as the Governing Body. Any reference to Governors means any Director of Cavendish Education.

This policy document is one of a series of AHS Policies that, taken together, are designed to form a comprehensive formal Statement of AHS's aspiration to provide an outstanding education for each and every one of its students, and of the mechanisms and procedures being put into place to achieve this. Accordingly, this policy needs to be read alongside all of these policies in order to get the full picture, and should be read in conjunction with the **Equality Policy**, the **Health and Safety Policy**, the **Promoting British Values Policy** and the **Safeguarding Children Policy** in particular. All of these policies have been written, not simply to meet statutory and other requirements, but to evidence the work that the whole School is undertaking to ensure the implementation of its core values, our '4 Cs':

Character

Creativity

Confidence

Competence

Abingdon House School fully recognises the responsibility it has under section 175 (Section 157 for Independent Schools and Academies) of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children.

This policy may be modified to respond to events or incidents that occur, subject to approval from the governing body. If the policy is amended this will be notified to staff and parents and noted on the website.

This responsibility is more fully explained in the statutory guidance for schools and colleges "[Keeping Children Safe in Education KCSIE](#)" (September 2025). All staff are made aware of their duties and responsibilities under part one of this document (set out below).

Staff Training

[KCSIE Part 1 2025 and Annex B](#) all staff read and sign to say they have read this.

All staff receive safeguarding training at the point of induction, alongside being provided with the [Staff Code of Conduct](#), [Children Missing from Education](#) and the [Mental Health Policy](#).

With regard to agency staff and any other staff that join the school in-year, a bespoke safeguarding induction is in place to ensure that new staff are appropriately trained.

Ongoing safeguarding training occurs for all staff throughout every academic year, with at least one dedicated safeguarding twilight every half term (6 times a year). In addition the safeguarding team provides regular updates to reinforce training in staff briefings and by email. All supply staff are contracted for additional hours to ensure they are present for after-school training.

Members of staff who work at the school but are not employed by the school therefore might have differing hours of working, for example 1:1 TAs employed by parents or guardians, use the same procedures and receive training on Safeguarding as they start and throughout the year.

Whole staff training

KCSIE Annex A (leaders and those who work directly with children)

“What to do if you’re Worried a Child is Being Abused: Advice for Practitioners” (July, 2015).

Introduction of My Concern (September 2020)

Introduction to Toot Toot reporting (September 2021)

External Safeguarding and Prevent Training for all staff (September 2021)

Online Safety (December 2021)

On the ground safeguarding (January 2022)

Recording and reporting (April 2022)

Confide (2023)

KCSIE key information and updates (September 2025)

Prevent key information and updates (September 2023)

Contents

Introduction	2
Staff Training	2
Important contacts	3
1. Aims	4
2. Legislation and statutory guidance	4
3. Definitions	5
4. Equality statement	5
5. Roles and responsibilities	6
6. Confidentiality	8
7. Recognising abuse and taking action	9
8. Online safety and the use of mobile technology	18
9. Notifying parents or carers	19
10. Pupils with special educational needs, disabilities or health issues	19
11. Pupils with a social worker	20
12. Looked-after and previously looked-after children	20
13. Complaints and concerns about school safeguarding policies	20
14. Record-keeping	21
15. Training	22
16. Monitoring arrangements	23
17. Links with other policies	23
<u>18. Appendices</u>	
Appendix 1: types of abuse	24
Appendix 2: safer recruitment and DBS checks – policy and procedures	24
Appendix 3: allegations of abuse made against staff	29
Appendix 4: specific safeguarding issues	36
• Children Missing From Education Policy	
• Child Criminal Exploitation (CCE)	
• Child Sexual Exploitation (CSE)	
• Domestic Abuse	
• Homelessness	
• So-Called ‘Honour-based’ Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)	
• Preventing Radicalisation	
• Child on Child Abuse	

- Sexual Violence and Harrassment Between Children at School
- Serious Violence
- Non Collection of Children
- Missing Child Procedures

Appendix 5: Roles and Responsibilities of Designated Safeguarding Lead (DSL) and Deputies

Appendix 6: Covid and Remote Learning Specific Safeguarding Procedures

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL) Prep School	Rory Vokes-Dudgeon (Headteacher, SLT)	rory.vokes-dudgeon@abingdonhouseschool.co.uk M: 07717 191 271
Designated safeguarding lead (DSL) Senior School	James Gilbert-Farrell (Head of Senior School, SLT)	james.gilbert-farrell@abingdonhouseschool.co.uk M: 07766 608 192
Deputy DSL (DDSL)	Nadia Carella (Assistant Headteacher (Senior), SLT)	nadia.carella@abingdonhouseschool.co.uk M: 07876 594 707
	Christopher Lloyd (Head of Prep School, SLT)	christopher.lloyd@abingdonhouseschool.co.uk M: 07837 196 183
	Rachel Cullen (Assistant Headteacher (Prep), SLT)	rachel.cullen@abingdonhouseschool.co.uk M: 07979 962 395
	Orla Forristal (Pastoral Lead)	orla.forristal@abingdonhouseschool.co.uk
	Jazmin Gahan (Pastoral Lead)	jazmin.gahan@abingonhouseschool.co.uk M: 07799264596
Principal	Koen Claeys	k.claeys@cavendisheducation.com M: 07936916015
Staff Lead Looked After, Previously Looked After, Adopted Children	James Gilbert-Farrell	james.gilbert-farrell@abingdonhouseschool.co.uk M: 07766 608 192
Local Authority Designated Officer (LADO)	Aqualma Daniel	07870481712 Aqualma.Daniel@rbkc.gov.uk

		Westminster LSCP Website and Contact Details: 020 7641 7668 and ask to speak to the Duty Child Protection Adviser Email lado@westminster.gov.uk
Chair of Governors	Koen Claey's	k.claeys@cavendisheducation.com M: 07936916015
Safeguarding Governor (Link Governor)	Koen Claey's	k.claeys@cavendisheducation.com M: 07936916015
Local Safeguarding Children's Partnership (LSCP) Westminster	Di Donaldson	Safeguarding Lead for Schools and Education Mobile: 07890 397 061 Email: di.donaldson@rbkc.gov.uk
Channel helpline		020 7340 7264
Non Emergency Advice Extremism		counter.extremism@education.gov.uk 020 7340 7264
FGM Helpline		0800 028 3550 (Known cases of FGM reported to police through 101)
Westminster Female Genital Mutilation Lead	Rochell-Ann Naidoo	Lead for FGM Telephone: 0207 641 1610 Email: rnaidoo@westminster.gov.uk
Prevent	Regional - Jennie Fisher Local - Julie Knotts	Email: jennie.fisher@education.gov.uk Email: jknotts@westminster.gov.uk

1. Aims

The school aims to ensure that:

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

This policy applies to all students at AHS. Any concerns regarding students over the age of 18 will be referred to adult social services. Westminster local procedures can be found [here](#).

SEE APPENDIX 6 FOR REMOTE LEARNING SPECIFIC SAFEGUARDING PROCEDURES.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (2019, updated September 2021)
- [Prevent Duty Guidance: for England and Wales](#) (July 2015, updated October 2023).
- [The Prevent duty: Departmental advice for schools and childminders](#) (October 2022)
- [The use of social media for on-line radicalisation](#) (July 2015)
- [Sexual violence and harassment between children](#)
-

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, inside or outside the home, including online.

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

DSL in this policy refers to the Designated Safeguarding Lead as well as the Deputy Designated Safeguarding Leads (DDSL) unless expressly stated otherwise.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18. (this policy applies to all students at AHS, including those 18 and over).

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Indicators of Abuse and Neglect

See [Appendix 1](#) for full definitions and indicators of:

Abuse

Physical Abuse

Emotional Abuse

Sexual Abuse

Neglect

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of Female Genital Mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs

- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners.

Abingdon House School (AHS) is in Westminster Local Authority. Information and procedures from the Local Safeguarding Children Partnership (LSCP) for Westminster can be found [here](#).

Any allegations against staff must be directed to the Westminster/Kensington and Chelsea LSCP.

Any safeguarding concerns for students at AHS need to be referred to the Local Authority Safeguarding Partnership in the Local Authority where the student lives. AHS has students from over 20 different Local Authorities, and the local authority for each student can be found on Schoolbase, or by entering their postcode into the following site: <https://www.gov.uk/find-local-council>. Where LAs have a MASH team or similar ('first port of call' line for advice), this will be the first contact made by the school to ensure local procedures are thoroughly followed.

London Child Protection procedures can be found [here](#) for reference.

Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff (including supply/agency staff and external consultants) will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration using a Google form at the beginning of each academic year (or at the point of joining the school) to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding policy, the [staff code of conduct](#), the role and identity of the designated safeguarding lead (DSL) and deputies, the [behaviour policy](#), the [online early help safety policy](#), and the [safeguarding response to children who go missing from education](#).
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as Female Genital Mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL)

Names and contact details of the DSL and the Deputy DSLs (DDSLs) are in the important contacts section at the beginning of this policy.

The roles and responsibilities of the DSL and DDSL are set out in appendix 5, and in their job descriptions.

The DSL is a member of the Senior Leadership Team and takes lead responsibility for the wider safeguarding in the school.

The DDSL are fully trained members of staff that take responsibility for safeguarding within the school as members of the safeguarding team, ensuring the DSL remains fully informed.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns, as will the Deputy DSLs.

Outside of school hours, any safeguarding concerns should be directed to Rory Vokes-Dudgeon, Headteacher, on 07706 760 222.

If the DSL and DDSLs are not available, the Principal will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and safeguarding matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so and use the [DfE guide to inter-agency working to promote the welfare of Children \(Sept 2018 - Updated July 2022\)](#)
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL and DDSLs will also keep the Principal informed of all issues (and immediately for any issues that meet the reporting criteria), and liaise with local authority case managers and designated officers for safeguarding concerns as appropriate.

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

MY CONCERN

The safeguarding team is responsible for picking up and addressing anything raised on My Concern. Should a member of the safeguarding team be absent, the DSL is responsible for their classes during their absence.

Should the DSL be absent, it is their responsibility to delegate daily DSL responsibility in their absence to the most appropriate DDSL.

During the working day, all entries in My Concern will be picked up and actions started by 4pm that day. Where a concern is marked as a Priority, it will be addressed immediately as the student could be considered to be in imminent harm.

When the DSL or DDSLs pick up a My Concern message, they will confirm with the person reporting that the concern has been picked up by the Safeguarding Team (in person or via email).

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding is at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Appoint a link governor (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety and will have safeguarding training that is updated regularly.

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

5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL and DDSs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable

5.5 Visitors

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings in a safe place, and their mobile phones away, during their visit.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

If any visitors have concerns about a child or a member of staff, they must report it to the office, who will immediately inform the Headteacher and DSL. An account of the concern will be taken from the visitor and regular safeguarding procedures followed as detailed in this policy.

6. Confidentiality

Safeguarding information will be stored and handled in line with the Data Protection Act 1998 principles. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Safeguarding records are subject to the provisions of the Data Protection Act, 1998. This means that a parent, or young person of sufficient age and understanding, may make a request to see the safeguarding record. If any member of staff receives a request from a student or parents to see safeguarding requests, they will refer the request to the Designated Safeguarding Leads or Headteacher.

The school will work closely with the Governance team to ensure that information is shared with the Local Safeguarding Partnership and other agencies as required, using the principles and guidance set out in the government's [information sharing advice for safeguarding practitioners](#).

The school will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a Senior Leader, the Local Safeguarding Partnership and/or Social Services Keyworker as required.

The following is critical information in information sharing and confidentiality:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- All sharing of safeguarding information should be done by the DSL, the designated deputy or the Headteacher. Staff may be directed by the DSL or deputies to share information directly with the safeguarding partners or other agencies as required and appropriate.

7. Recognising abuse and taking action

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

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

AHS uses My Concern to log and record any safeguarding concerns about a student. All concerns should be immediately recorded on My Concern (as well as personally informing the DSL or deputy), and the DSL, deputies and Headteacher are alerted about this immediately.

AHS recognises that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL) or recording information on My Concern.

Any possible safeguarding concerns should be recorded on My Concern, and staff are not required to consider any types of thresholds for recording information on My Concern ('over reporting' is actively encouraged at AHS).

ASH has a safeguarding team made up of the DSL, a number of deputies and the Principal to ensure that a trained member of staff is always available to report concerns to and to take immediate action. In most instances, the DSL will take the lead on actions and reporting. However, if a member of the safeguarding team is not available, staff should refer concerns directly to the appropriate local authority safeguarding team.

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **The referral needs to be made to the Safeguarding Partnership of the Local Authority where the child lives.**

While the DSL should be informed immediately if there are concerns, anyone can make a referral. Where a referral is made by someone outside of the school's safeguarding team, tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

See section 5 regarding referring safeguarding concerns to the appropriate local authority.

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation on My Concern as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police on 101, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures. The FGM helpline can also be contacted on 0800 028 3550.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

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

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

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

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL as soon as practically possible after the referral.

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

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a mental health concern

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action in reporting this as detailed in this policy.

AHS closely tracks all students' mental health and wellbeing and offers a holistic level of support through classroom staff, pastoral staff, therapists, the senior leadership team and the Heads of Mental Health and Wellbeing.

Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. 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.

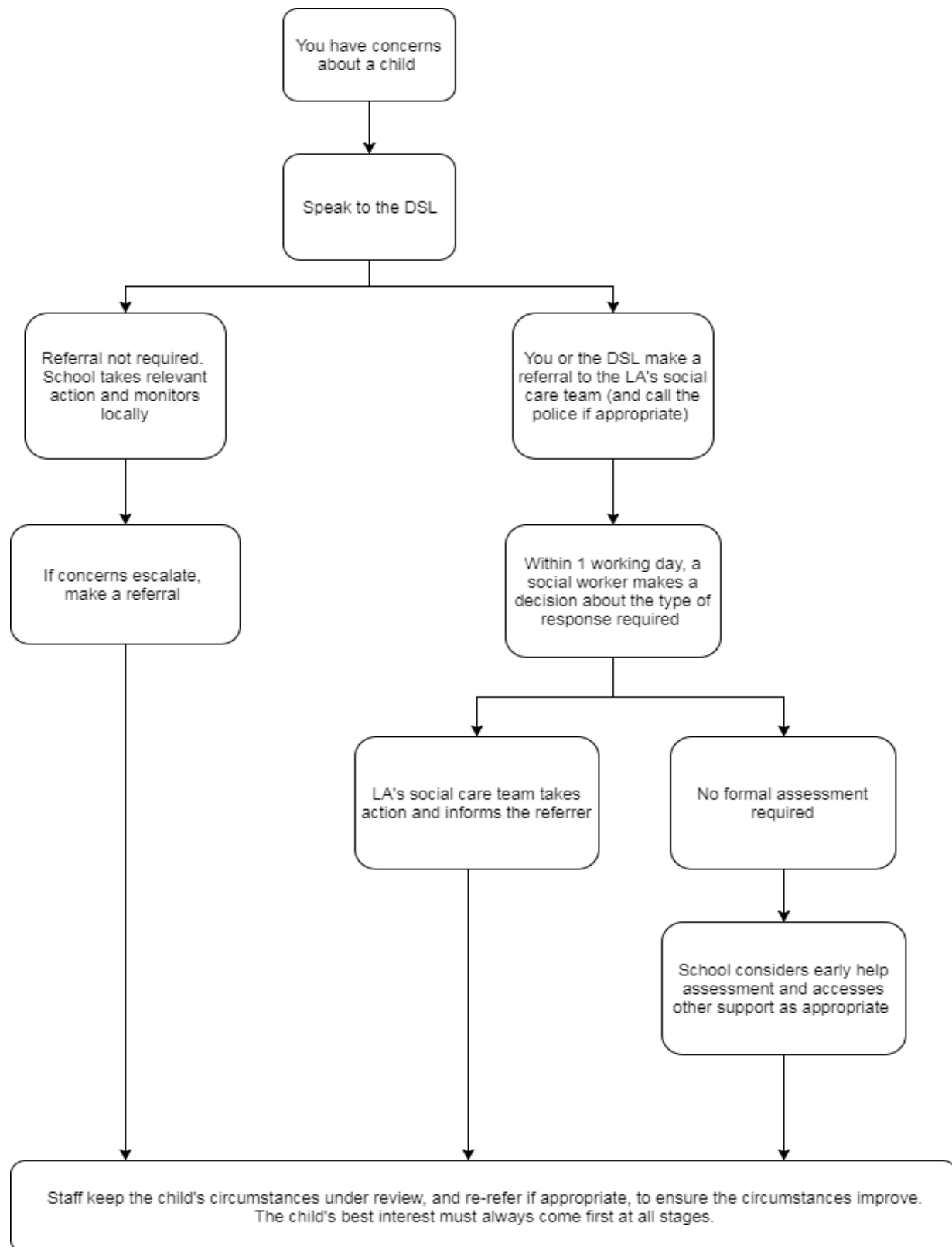
More details on supporting mental health at AHS can be found in the [Mental Health Policy](#).

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary 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. See [Rise Above](#) for links to all materials and lesson plans.

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

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

STAFF MUST ENSURE ALL SAFEGUARDING CONCERNS ARE RECORDED ON MY CONCERN.



7.7 Concerns about a staff member, supply/agency teacher, volunteer or contractor

- If you have concerns about a member of staff (including a supply/agency teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply/agency teacher, volunteer or contractor) posing a risk of harm to children, the Headteacher must be informed immediately.
- If the DSL or DDSL is informed about an concern or allegation against a member of staff, this needs to be reported to the Headteacher immediately;
- In the Headteachers absence, this should be reported immediately to the link governor, Stephen Aiano;
- If the concerns/allegations are about the Headteacher, speak to the link governor or chair of governors and do not inform the Headteacher;
- In the case of serious harm, the police should be contacted immediately.

The Headteacher/link governor/chair of governors will then follow the procedures set out in appendix 3 (in the first instance, contacting the LADO). The LADO will be contacted within one working day.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply/agency teacher, volunteer or contractor) to the Headteacher or link governor/chair of governors, report it directly to the local authority designated officer (LADO) (details in important contacts list).

KEY INFORMATION FOR ALL STAFF

[To be signposted by DSL at induction]

Concerns about a student - report! You can use My Concern, talk to a DSL or raise this with another member of staff.

Concerns about any member of staff (including supply/agency staff or volunteers) - report this to the Headteacher.

Concerns about the Headteacher - report this to the link governor, Stephen Aiano (contact details are on all Safeguarding Team posters around the school).

If you have any concerns about reporting to the Headteacher or link governor you can contact the LADO directly (contact details are on all Safeguarding Team posters around the school).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously and we have a zero tolerance policy on child-on-child abuse.

We also acknowledge that even where there are no reported cases of child-on-child (peer-on-peer) abuse, this does not mean it's not happening and continually seek to find and stop it.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse and sexual harassment.

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

This section should be read in conjunction with the [Relationship and Sex Education Policy](#).

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly (but not exclusively) affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes ('sexting')

The school refers to the [guidance from the UK Council for Internet Safety](#) in creating procedures surrounding all internet safety concerns.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, the police from the local authority where the student lives will be the first point of contact.

The DSL will ensure that any child required to be present in a police interview is accompanied by an appropriate adult.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

7.10 Reporting systems for our pupils

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

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

AHS has a high staff to student ratio and students are actively encouraged as part of the whole school culture to report/discuss any concerns or worries that they may have. All students have dedicated staff that oversee their provision including a form tutor and class TA, dedicated class therapists, SENCos and a Deputy Head (although students are encouraged to speak to any staff member at any point).

There are also specific systems and supports in place to further encourage students to report or discuss concerns, including:

- social skills and life skills lessons
- small group and individual therapy sessions delivered by qualified staff (emotional therapy, speech and language, occupational therapy, physiotherapy)
- talk time sessions and wellbeing drop ins
- PSHE and RSE lessons
- Toot Toot reporting (introduced September 2021)
- whole school themed days and weeks

When reporting concerns, staff must make it clear to students that this information will need to be shared, but this will only be done with relevant staff and in a sensitive way.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Have a robust firewall on our school internet, which includes reporting of attempted access to blocked content
- Continually share information with parents and carers to ensure a collaborative approach to keeping children safe when using technology, both in and out of school
- Encourage the reporting of any concerning online behaviour, both in and out of school

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our weekly communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit personal use to non-contact time when pupils are not present (as a small school that is very technologically focussed and engages extensively in education outside of the classroom, staff may use their mobile phones to access the school drive in the cloud and as a means of contacting others for work purposes)
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems (Smoothwall) to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. This includes a reporting programme, sent to the relevant Senior Leader, when blocked sites have attempted to be accessed.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. Mobile phones are taken from pupils at the start of the school day and returned to them when they leave. Appropriate use of mobile phones is taught in PHSE and IT lessons.

9. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

10. Pupils with special educational needs, disabilities or health issues

All students at AHS have special educational needs or disabilities (SEND). We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Students 18 years and older with SEND may not have the mental capacity to make their own decisions, and this needs to be assessed when concerns are raised for students in this age group. Westminster LA procedures for safeguarding adults can be found [here](#). Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

School wide and individual supports and interventions exist within the school to support our students regarding their communication and vulnerabilities including:

- whole class, small group and individual therapy (speech and language, occupational, physio, emotional)
- universal, targeted and specialist pastoral support for all students delivered by trained and experienced staff
- small class sizes and low staff to student ratios
- PSHE programmes that are tailored to meet students individual needs
- Weekly social skills and life skills classes for all students

11. Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of childrens' social workers and relevant virtual school heads

We have appointed an appropriately trained member of staff, (named in the contacts list), to take the lead on promoting the progress and achievement of looked-after and previously looked-after children, alongside the appointed Deputy Head and SENCo.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

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

13.2 Other complaints

All other complaints will be handled in accordance with the school's complaints procedure, which can be found on our website or accessed through the school office.

13.3 Whistle-blowing

The school ensures that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed [whistle-blowing policy](#) (found on staff share or through the school office).

14. Record-keeping

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

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

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate safeguarding file for each child (on My Concern or in the secure safeguarding section of the staff drive).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When required to share safeguarding information with outside agencies, this will be done through a secure electronic transfer (using My Concern or password protected documents), or in hard copy via registered post (tracked and signed).

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

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

This training will be regularly updated and will:

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

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

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

With regard to supply/agency staff, volunteers and any other staff that join the school in-year, a bespoke safeguarding induction is in place to ensure that new staff are appropriately trained.

Ongoing safeguarding training occurs for all staff throughout every academic year, with at least one dedicated safeguarding twilight every half term (6 times a year). In addition the safeguarding team provides regular updates to reinforce training in staff briefings and by email. All supply/agency staff are contracted for additional hours to ensure they are present for after-school training.

15.2 The DSL and DDSLs

The DSL and DDSLs will undertake Level 3 safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins CASPAR, weekly Andrew Hall briefings, bi-borough updates, DFe updates), meeting other DSLs (including regional bi-borough meetings), or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training, and all training includes inter-agency working.

15.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

15.4 Recruitment – interview panels

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

See appendix 2 of this policy for more information about our safer recruitment procedures.

15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by the DSL and Principal. The policy, and the way the school and safeguarding team undertake their duties is reviewed annually by the Board of Governors and overseen by the chair of governors.

17. Links with other policies

This policy links to the following policies and procedures:

- [Behaviour](#)
- [Staff Code of Conduct](#)
- [Safer Recruitment Policy](#)
- [Complaints](#)
- [Health and safety](#)
- [Attendance](#)
- [Online safety and Mobile phone use](#)
- [Equality](#)
- [Relationships and sex education](#)
- [First aid](#)
- [Curriculum](#)
- [Data Protection and GDPR](#)
- [Whistleblowing](#)
- [Anti-Bullying](#)
- [IT Acceptable Use](#)
- [Preventing Extremism and Radicalisation Policy](#)

APPENDICES

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

Appendix 1: types of abuse

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and the school's policy and procedures in dealing with it (as detailed in this policy)

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

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

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

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

[Refer to Safer Recruitment Policy.](#)

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply/agency teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective safeguarding while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the chair of governors (or designated governor appointed by the chair) where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Cavendish Education

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- The school would not investigate allegations before first speaking with the LADO.
- Conduct basic enquiries in line with local procedures to establish the facts to help determine the foundation to the allegation to pass onto the LADO.
- Discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can use their union for support, and can also access counselling through the school (contact Head of HR)
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS/TRA where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply/agency teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply/agency teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

- Is inconsistent with the staff [code of conduct](#), including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, offensive language or humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [code of conduct](#)

The school will refer to the following governmental guidance as required: . [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)]

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 4: Specific Safeguarding Issues

Children Missing from Education Policy

The updated guidance makes clear that the [DfE's Working together to improve school attendance](#) is now statutory guidance.

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Our procedures include:

- continuing to work with parents to ensure we have a minimum of two emergency contacts for each student
- informing the local authority of every student who leaves AHS, no matter what time of year this is or whether a new school has been named or not (when removing any child from our admissions register) Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage;
- in forming the local authority, the school will provide all information given to them around the destination school or elective home tutoring;
- when taking the daily registers, staff only enter that the whether the student is present, and do not use codes for authorised absences. This is all done through the office to ensure consistent oversight;
- for any student who is absent and the school has not been informed of that absence, the office will start ringing home from 9.00am;
- should a child be absent from school for more than one day and parents are not able to be directly contacted to explain the absence, the school will immediately inform the local authority where the child resides;
- weekly attendance tracking is performed by the Headteacher in order to identify any unexplained changes to attendance rates or patterns of absences (with appropriate interventions put into place, and local authorities informed where unexplained concerns arise)

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

We understand that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

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

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

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

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

Domestic abuse

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

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

regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Children who are exposed to domestic abuse are recognised as victims themselves due to its significant impact.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the school will work closely with the police to support the child at school, following the policies and procedures of the police force in that particular borough.

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

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmua@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

- **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in the school's [Preventing Extremism and Radicalisation Safeguarding Policy](#).

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

INTRODUCTION

Sexual harassment and abuse, both in person and online, are serious issues that are prevalent across all sectors of society including within our schools. At Abingdon House School (AHS) we do not tolerate sexual harassment in any form and are committed to:

- Having a 'this could happen here' mentality and proactively challenging and addressing any form harassment or inequality in our community
- Ensuring a culture that does not tolerate harassment in any form, and where members of our school are treated with courtesy, dignity and respect
- Not allowing misogyny, sexual harassment, sexual jokes, online sexual imagery and coercion to be normalised; promoting and role modelling appropriate standards of conduct at all times
- Implementing strategies, processes and procedures to ensure that all members of the school community know their rights and responsibilities in these areas
- Encouraging the reporting of any concerns
- Treating all complaints and concerns in a serious, sensitive, fair, timely and confidential manner

DEFINITIONS

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex

- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

Sexual harassment is not behaviours this is based on mutual attraction, friendship or respect. If the interaction is consensual (for children, this would be for those of a similar age and taking into consideration the age of consent), welcomed, and reciprocated, it is not sexual harassment.

The age of consent in England and Wales is 16. This is the legal age at which a person can take part in sexual activity.

This applies to everyone, whatever their sex or gender and whatever the sex or gender of the person the sexual activity is with.

The law is there to protect children and young people. It is not used to prosecute under-16s who take part in consensual sexual activity with each other. For example, if two 15 year-olds have mutually consensual sex, they would not be prosecuted. But if an adult aged 18 or over has sex with a 15 year old, it is a crime.

The law also says that anyone under the age of 13 can never consent to sexual activity under any circumstances. This means that taking part in any type of sexual activity with someone younger than 13 is always a crime.

Although the age of consent is 16, the law has some extra protections in place for young people aged 16 and 17. It is illegal to:

- Take a photo or video of someone aged under 18 engaging in sexual activity (for example a sext)
- Pay for sexual services from someone under 18
- Take part in sexual activity with someone under 18 if you are in a position of trust (for example, you are their teacher, social worker, doctor, care worker)

WHOLE SCHOOL APPROACHES

Staff (adult on adult)

The Staff Code of Conduct sets out expected behaviours and role modelling responsibilities for all staff. Any concerns of adult on adult sexual harassment should be reported to the Headteacher immediately. In their absence, concerns or complaints should be brought directly to the Bursar. If the concern is about the Headteacher, this should be directed to the Safeguarding Governor (Stephen Aiano s.aiano@cavendisheducation.com).

Students

At AHS, we are committed to ensuring a safe, tolerant and accepting environment free of harassment for all of our students, where a culture of reporting any concerns is the norm.

Key areas that support this include (but are not limited to):

- Explicit teaching of what is acceptable, what is not and consent through PSHE, Sex and Relationship Education, So Safe, Social Skills Lessons and Life Skills Lessons
- A communication friendly environment, supported by trained teachers and therapists, that ensures our students have a voice, can use adaptive strategies when communication is challenging (eg-visuals, technology) and that all concerns expressed by students are taken seriously
- A culture of telling and reporting
- Increased pastoral and emotional wellbeing support across the school (Head of Mental Health and Wellbeing, Head of Behavioural Support and Wellbeing, Diversity and Equality Champion)
- Universal provisions delivered by all staff ensuring student voices are heard and social and emotional support is integrated into all aspects of a student's day
- Universal, targeted and specialist emotional and behavioural support across the school for all students
- Whole school activities, focus weeks, speakers and displays around diversity, inclusion and tolerance
- Student wellbeing surveys
- Student Council
- A school wide approach that ensures all students are thoroughly known and understood by all staff
- High staff to student ratios
- Strong and thorough tracking and assessing of students across all areas of their development
- Strong firewalls and electronic reporting of attempted blocked site searches, as well as teacher monitoring software of student computers
- Girls and boys group enrichments sessions
- An online reporting app for all students (introduced in September 2021)
- Continual training and professional development for staff
- Working closely with our Local Safeguarding Partners to ensure systems and procedures are in place and constantly reviewed

REPORTING, PROCEDURES, OVERSITE

The oversight for sexual harassment between adults is led by the Headteacher and Bursar.

The oversight for sexual harassment amongst students is overseen by the Designated Safeguarding Lead and members of the Safeguarding team.

Any concerns around sexual harassment must be reported immediately and will be thoroughly investigated in line with the Staff Grievance Procedures (for adults on adults) and the Behavioural Management and Support, Anti-Bullying Policy and Safeguarding Policy (for students). Any concerns regarding a staff member and a student must be reported to the Headteacher immediately (link governor or chair of governors in their absence) and will be referred to the LADO.

Where a student discloses any information around sexual harassment to staff, these must be handled using the Safeguarding Procedures (immediate reporting through My Concern, and a discussion with the DSL or deputies).

A child-on-child and sexual harassment log is kept for students, and reviewed termly by the Safeguarding Team.

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

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

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

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

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

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

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

Non-collection of children

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

- ensure the student is supervised by a member of staff
- contact the parents/carers
- contact emergency contacts if parent/carers are not able to be reached
- contact the police and social services should a child not be collected and parents/carers/emergency contacts are not contactable (2 hours after dismissal, or sooner should concerns arise)

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the procedures as set out in our [Missing Child Procedures](#).

Appendix 5: Roles and Responsibilities of Designated Safeguarding Lead (DSL) and Deputies (DDSL)

(reference Annex C KCSIE 2022)

Designated Safeguarding Lead

An appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding (including online safety), which is explicit in their job description. This person will have the appropriate status and authority within the school to carry out the duties of the post.

The role of the designated safeguarding lead carries a significant level of responsibility, and they will be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy Designated Safeguarding Leads

Any deputies will be trained to the same standard as the designated safeguarding lead and the role will be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time a member of the safeguarding team (DSL or DDSL) will always be available on both sites (during school or college hours) for staff in the prep school, senior school or college to discuss any safeguarding concerns. The safeguarding team is of a size to ensure that availability in person, however on the occasion that this may not be the case, the DSL or DDSL should be contacted by phone. DSL and DDSLs will be available out of school hours during school run events (trips, residential etc). Other concerns outside of school hours should be referred immediately to the police in the case of imminent harm or danger, or directly to the Local Safeguarding Children's Board in the child's local authority. The DSL should immediately be informed via email, or phone call the next working day.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;

- liaise with the Headteacher or Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#);
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for safeguarding concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the Heads of Behavioural Support, Mental Health and Wellbeing, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare and safeguarding issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort;

and,

- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Information Sharing and Managing the Safeguarding File

The designated safeguarding lead is responsible for ensuring that safeguarding files are kept up to date.

Information should be kept confidential and stored securely (My Concern). It is good practice to keep concerns and referrals in a separate safeguarding file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two KCSIE.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their safeguarding file is transferred to the new school or college 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. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Secure electronic transfers can occur through My Concern.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child’s safety, welfare and educational outcomes. In addition to the safeguarding file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college 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 or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's safeguarding policy and procedures, especially new and part-time staff;
- ensure the school's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare and safeguarding issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, Knowledge and Skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a safeguarding case conference and a safeguarding review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare and safeguarding matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the Views of Children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and Sharing Information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 6: COVID and Remote Learning Specific Safeguarding Procedures

There are many circumstances that may result in students needing to access learning remotely, and staff having to teach remotely.

It is critical that all staff continue to be vigilant in recognising safeguarding concerns while remote teaching and learning is in place.

These procedures apply when staff and/or students are learning remotely off site.

1. DSL/DDSL Cover

- when the school is open for students to attend in person (but enhanced measures are in place meaning the learning style and location of students may change), there will be a DSL or DDSL on both sites as the ideal
- If the DSL is off site (but well), then can be contacted by phone or email
- If the situation arises where there isn't a DSL or DDSL on one of the sites, they will be contactable via phone and email
- Should the DSL and DDSLs not be available off site (due to illness or otherwise), an appropriate member of SLT will be delegated to report any safeguarding concerns to
- Regular monitoring and responding to My Concern reports will occur.

2. Children Learning Remotely and Staff Teaching Remotely

The disruption due to Covid has had a significant impact on our students mental health, anxiety and progress. All staff must remain vigilant in recognising concerns for a students welfare both at school and when learning

remotely. All concerns must be reported, no matter how trivial they may appear (both pastoral and safeguarding).

Where a student is needing to access learning from home, due to a full or partial closure or because they are isolating, the following should occur:

- Classes to be taught in groups (except teletherapy)
- Should a 1:1 session need to occur with a member of staff (tutoring, pastoral), consent for this to occur must be sought from the parent
- Staff and children must wear suitable clothing, as should anyone else in the household
- Any computers used should be in appropriate areas, for example, not on beds; and the background should be blurred if not neutral
- Lessons can only be accessed through google suite using school issued email addresses and logins (which can be monitored from school at the time or retrospectively)
- Staff to use Netops to monitor student computer activity during the school day
- Language must be professional and appropriate, including any family members in the background
- Students who are not on site will be encouraged to report any concerns or problems they are having directly to a member of staff over video link, through email or using Toottoot.
- Staff should record the attendance of any sessions held, and report unexplained absences to the form tutor and appropriate Deputy Head (to be followed up on)
- The official attendance register will follow the most up to date [guidance](#) from the Department for Education
- Should staff have any concerns about a child appropriately accessing learning remotely, this should be referred to: the form tutor/Deputy Head for Pastoral Concerns and the DSL for Safeguarding concerns, to be followed up with that day
- Should a child be acting inappropriately during an online session, that session should end for that student immediately and the situation referred as stated above
- If staff have an urgent safeguarding concern following a lesson, they must contact the DSL by phone immediately (or in person if on site) as in the normal safeguarding procedures. If this isn't possible, the member of staff should escalate the situation as stated in this Safeguarding Policy
- Concerns regarding staff should be reported to the Headteacher, Chair of Governors or directly to the LADO as detailed in this Safeguarding Policy
- All other safeguarding procedures will remain in place as detailed in this policy

3. Safer Recruitment and Volunteers

- all safer recruitment practices remain the same
- only fully vetted staff and volunteers will engage in remote learning with students

4. Teletherapy

Below is the information sheet and consent form for teletherapy. Whole school consent has been obtained, so the form is no longer required:

Teletherapy Consent Form

Telehealth, or Teletherapy as we will call it, is the remote provision of healthcare services using technology (www.RCSLT.org - Telehealth Guidance). Teletherapy can be used as a way of delivering Therapy to children or adults. Please review this consent form and let me know if you have any questions. Once you are happy that teletherapy will be a way of supporting your child please sign your consent and return this to me.

The Therapists will be using a video conferencing platform to deliver teletherapy sessions (google meet). You will be sent an email containing a meeting invitation. **In order to access teletherapy you will need:**

A computer, laptop or iPad/tablet connected to the internet. Although you can access the link via a mobile phone this is not ideal.

Anti-spyware and antivirus protection should be used on your device.

A reliable internet connection (consider using an ethernet cable if your Wi-Fi is not reliable).

Ensure you have secure internet access using security features avoiding public wifi.

A parent or adult will have to be present to accept the video or phone call.

To ensure your child is sat comfortably, at a table if possible.

A quiet room where you will not be interrupted.

You may be sent resources for the session beforehand, please make sure you have these to hand.

You may be asked to provide some of your child's own toys for activities. Your Therapist will communicate before the session to give you time to prepare.

Clinical outcomes from the video or phone call will be recorded and stored in your child's clinical record.

Teletherapy Consent Form

Declaration of Consent:

I understand that there are potential risks involving technology, including but not limited to: Internet interruptions, unauthorized access and technical difficulties. I understand that technical difficulties with hardware, software, and internet connection may result in service interruption and that the Therapist is not responsible for any technical problems and cannot guarantee that services will be available or work as expected. I understand that I am responsible for information security on my computer and in my own physical location. I understand that I am responsible to ensure privacy at my own location so that individuals who are not involved in the therapy session cannot hear our conversation (people who may also be involved in the session include parents, siblings and other carers).

I understand that I will need to be present to accept the video or phone call.

Due to updated guidance around safeguarding during remote learning, we will be video recording our therapy sessions with the students. If you are staying with your (parent/carer) child for the session, which we prefer, the session will not be recorded.

I have read and understand the information provided above regarding teletherapy. I have discussed this with the Therapist and all of my questions have been answered to my satisfaction. I hereby give my informed consent for the use of teletherapy.

I understand I may withdraw my consent for teletherapy at any time by contacting my child's Therapist.

Signed:

Print Name:

Relationship to Child: _____

All remote learning is in regard to the Non-statutory interim supplement to KCSIE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)