



# The Study Prep

WIMBLEDON

## SAFEGUARDING POLICY (Safeguarding and Promoting the Welfare of Pupils)

### Policy Statement

This policy applies to all pupils including those in Early Years Foundation Stage (EYFS).

This policy has been compiled with reference to the following statutory guidance and advice:

- *Keeping Children Safe in Education* (September 2021) ("KCSIE")
  - o *Disqualification under the Childcare Act 2006* (September 2018)
  - o *KCSIE* also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015)
- *Working Together to Safeguard Children* (2018) ("WT")
  - o *Information sharing: advice for practitioners providing safeguarding services* (July 2018)
- *The Revised Prevent duty guidance: for England and Wales* (July 2015) ("Prevent"). *Prevent* is supplemented by non-statutory advice and a briefing note:
  - o *The Revised Prevent duty: Departmental advice for schools and child care providers* (June 2015)
  - o *The use of social media for on-line radicalisation* (July 2015)
- *Relationships education, relationships and sex education (RSE) and health education* (June 2019).
- *Sexual violence and sexual harassment between children in schools and colleges* (September 2021)

It has also been formulated with reference to and in conjunction with Merton Local Authority's inter-agency. This policy is reviewed and updated annually and was last reviewed in July 2021 and is available on the School website.

**Aims:** At all times, the School is committed to the best interests of its pupils. The aim of this policy is to ensure that our pupils feel safe and protected from any form of abuse and to deliver a curriculum that encourages independence, thus enabling children to take the steps required to protect themselves

**Objectives:** To provide guidance for staff on how to recognise abuse, deal with suspected abuse or a 'disclosure' and to avoid allegations of abuse.

**Transparency:** A copy of this policy is available on the School's website and we hope that parents and guardians will always feel able to raise any safeguarding concerns that they may have with the School. The School will never ignore an allegation of child abuse and will always investigate any concerns thoroughly and in accordance with our policies and procedures.

## Concerns about a Child

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility and all staff are made aware of this collective responsibility. The School has arrangements in place for listening to pupils and providing early help and intervention. The School will always ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. Details of these arrangements are set out in this Policy.

If a member of staff suspects abuse or neglect, or overhears an allegation or complaint of abuse or neglect of a pupil or has any concerns about a child's welfare, they must act immediately and follow the relevant procedure below. Staff should never assume that someone else will take action and share information that might be critical in keeping children safe.

The guidance, Information Sharing: Advice for Practitioners providing safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ('DSL').

## Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

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

Staff are referred to Appendix A of this policy for further detail of the types of abuse and possible signs of abuse.

## Staff & Contact Numbers

### The School's Designated Safeguarding Leads (DSLs) are:

**Joanna Gay, Deputy Head (deputyhead@thestudyprep.co.uk) - on both sites every day.** Contact via the Wilberforce House Office extension 10 or the Spencer House Office extension 31. The Deputy Head is the lead DSL.

### The Deputy DSLs are:-

#### **Vicky Ellis Head (head@thestudyprep.co.uk) - on both sites everyday**

Contact via the Wilberforce House Office extension 10 or the Spencer House Office extension 31.

**Susan Johnson, Early Years Coordinator (susan.johnson@thestudyprep.co.uk) - based in Reception Yellow, Wilberforce House.** Contact via the Wilberforce House Office internal extension 10.

**The Governor with responsibility for Safeguarding is Emma Picken.**

**Merton Local Authority LADO [lado@merton-gov.uk](mailto:lado@merton-gov.uk) (tel: 0208 545 3187 or 07814 642 727)**

(COVID- 19 UPDATE: PLEASE NOTE: Throughout the current situation the LADO John Shelley is working from home. However, the telephone numbers are the same; email: [lado@merton.gov.uk](mailto:lado@merton.gov.uk) or securely: [lado@merton.gov.uk.cjsm.net](mailto:lado@merton.gov.uk.cjsm.net).)

*Local Authority Designated Officer (LADO)* has overall responsibility for the management of allegations of abuse by adults who work with Children. The LADO provides advice and guidance, liaises with the Police, Social Care Teams, Regulatory Bodies such as Ofsted and other organisations as needed and ensures a consistent, fair and thorough process for both child and adult.

**Merton Multi-Agency Safeguarding Hub (MASH)** (Telephone: 020 8545 4226 or 020 8545 4227 (out of hours: 020 8770 5000); email: [mash@merton.gov.uk](mailto:mash@merton.gov.uk))

**The Multi-Agency Safeguarding Hub (MASH)** is the single point of contact for all safeguarding concerns regarding children and young people in Merton. It brings together expert professionals, called “navigators”, from services that have contact with children, young people and families, and makes the best possible use of their combined knowledge to keep children safe from harm.)

**Wandsworth Multi Agency Safeguarding Hub 020 8871 6622 (9am to 5pm) or the Out of hours: 020 8871 6000 or email [mash@wandsworth.gov.uk](mailto:mash@wandsworth.gov.uk)**

**Merton Access and Assessment Team Children, Schools and Families Department (020 8545 4226/4227) or the Out of Hours Children’s Emergency Duty Team – Merton, Kingston, Richmond and Sutton (020 8770 5000)**

**Information on the Merton Safeguarding Children’s Partnership: <https://www.mertonscp.org.uk>**

**The Merton Safeguarding Children’s Partnership can be contacted by emailing [mertonlscb@merton.gov.uk](mailto:mertonlscb@merton.gov.uk); tel: 020 8545 4866**

**Information on the Wandsworth Safeguarding Partnership: <https://wscp.org.uk>**

**Disclosure and Barring Service Tel: 03000 200 190 or email [customerservices@db.s.gsi.gov.uk](mailto:customerservices@db.s.gsi.gov.uk)  
Teaching Regulation Agency Tel 0207 593 5393**

**DfE dedicated helpline for non-emergency managing extremism advice for staff and governors: 0207 340 7264 or [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)**

**NSPCC whistleblowing tel 0800 028 0285 (Monday – Friday 8am to 8pm) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)**

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD; Managing Disclosures**

At the Study Prep, staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases acting as the lead professional in undertaking early help assessment. Staff should not assume that someone else will take action and share information that might be critical in keeping children safe. Records are kept of the concern raised and appropriate action taken. The School prides itself on its approachable staff and its culture of listening to pupils. In PSHE lessons, circle time, form time, assemblies and classroom lessons, pupils are made aware that they can approach any member of staff about any concerns or issues they may have. In addition there is a

weekly 'drop in' chat session for Spencer House pupils run by EQPrep. The qualified staff who run this service have been briefed to report any safeguarding concerns to the Designated Safeguarding Leads. This service is also available to Wilberforce House pupils by arrangement. When a pupil wants to confide in a member of staff, all staff are required to follow the guidance below:

### **Do**

- React professionally, and remember that you are not carrying out an investigation, (which is a task for specialists).
- Take what the pupil says seriously, and calmly, without becoming emotionally involved.
- Make it clear why unconditional confidentiality cannot be offered. Explain that any adult member of staff is obliged to inform the DSL, if child protection or safeguarding issues are involved, in order that specialist help can be arranged.
- Be available to the pupil, but gently encourage the pupil to speak directly to the DSL.
- Explain that only those who have a professional 'need to know' will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse.
- Reassure the pupil that she was right to tell, and that she is not to blame for having been bullied or abused.
- Allow the pupil to tell her own story, without asking detailed or leading questions.
- Record what has been said as soon as possible after the conversation. Include date, time and location and make an accurate record of what was said *in the pupil's own words*. Refer to the DSL (the Deputy Head), or one of the Deputy DSLs (the Head and the Early Years Coordinator), as soon as possible - at least by the end of the morning/afternoon session of that day. Keep the conversation confidential, other than referring it to the relevant DSL.
- The Head should be informed immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the School, or on a school trip. (If the Head is unavailable – or is involved - the Chair of the Board of Governors should be informed immediately).

### **Don't**

- Offer absolute confidentiality or make promises that you cannot keep.
- Jump to conclusions.
- Ask leading questions.
- Speculate or accuse anybody.

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with them. However, concerns of this nature must be referred to the DSL or the Head, who will decide on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation, or place the pupil at further risk.

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

Where there is a safeguarding concern, the School will enable pupils to express their wishes and feelings and will take these into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School operates its processes, systems and policies with the best interests of the pupil at its heart.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the School. The School will as part of the wider assessment of pupils, consider whether environmental factors are present in a pupil's life that

are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## **Early Help**

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

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the pupil , such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is experiencing , or is at risk of experiencing family ostracism
- Is a privately fostered child.

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

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

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

If staff members (including governors, agency staff and volunteers) have any concerns about a pupil, they should raise this with the School's DSLs. The DSL will decide whether to make a referral to children's social care, but any staff member can refer their concerns to children's social care directly. As set out above, staff should not assume that someone else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. All staff have been made aware of this in their training. Staff are aware of the definitions of abuse as outlined in Appendix A and that, as per KCSIE 2021, this would also include "honour" based violence and forced marriage. However, given the pupil profile at the School, the latter are not deemed to be high risk events.

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

If a pupil is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make such a referral and all staff are aware of this. Any such referral must be made

immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social services as appropriate. All concerns, discussions and decisions (together with reasons) will be recorded in writing. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care.

The School's Local Safeguarding Children Partnership is Merton (<https://www.mertonscp.org.uk/>)

Referrals can be made to the Merton Multi Agency Safeguarding Hub (MASH) 020 8545 4226/4227) or the Out of Hours Children's Emergency Duty Team – Merton, Kingston, Richmond and Sutton (020 8770 5000), or to the appropriate local authority.

Where a child is identified as in need of additional support from one or more agencies, an inter-agency assessment will be carried out such as the Common Assessment Framework. The **common assessment framework** (CAF) is a standardised approach for the **assessment** of children and their families, to facilitate the early identification of additional needs and to promote a coordinated service response.

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

Staff should follow the School's normal referral processes when there are concerns about pupils who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care. The School carries out an annual Prevent Risk Assessment with the governors, to ensure that any risk of pupils being drawn into extremist activities is carefully assessed.

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

A staff member must report to the Police, cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix A of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

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

All staff should be aware of indicators that may signal that pupils are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

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

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

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

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

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

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

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

### **What staff should do if a pupil goes missing from education?**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with a pupil who goes missing from education are detailed in its Attendance Policy. The School will report to the Local Authority in which the pupil resides, a pupil who fails to attend school regularly or has been absent from School without the School's permission for a continuous period of 10 school days or more.

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

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

If staff have concerns about another staff member (including supply staff), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of the Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) at Merton Local Authority.

### **What staff should do if they have concerns about safeguarding practices in the school**

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

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

## **ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS**

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include;

- bullying (including cyber bullying, prejudiced-based and discriminatory bullying);
- physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- , 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);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, or cause the victim humiliation, distress or alarm;
- Consensual and non-consensual sharing of nudes and semi-nudes images and or videos(also known as sexting or youth produced sexual imagery);
- sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment such as sexual comments, remarks, jokes and online sexual harassment. Abusive comments and or interactions should never be passed off or dismissed as "just banter", "just having a laugh" or "part of growing up". Nor will harmful sexual behaviours be dismissed as such. Examples of bullying in a school such as the Study Prep, largely comprise name calling, or exclusion from groups or friendships. This should not be confused with the "falling out", and "making up the next day" that frequently happens between girls of this age. For this reason, bullying can be defined as behaviour that is **intentional** and **usually repeated over time** which t physically or emotionally hurts another individual or group (Merton Council threshold for what constitutes bullying). Staff are aware that bullying can include matters such as gender based violence, sexual assaults and sexting but given the School's profile, these are not deemed high risk with the Study. (however pupils are taught about deception online and the use and issues of social media).

The School recognises that a pupil is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. A pupil who has raised an allegation will be reassured that they are being taken seriously, that they will be supported and kept safe and are not creating a problem by raising an issue.

The School recognises that pupils with special educational needs and disabilities can be more prone to peer on peer group isolation than other and will provide extra pastoral support for these pupils. All staff are aware of the pupils on the special educational needs and disabilities register and these pupils are monitored by our Learning Support Coordinator. Any pastoral issues are discussed with staff at weekly briefings and appropriate action taken.

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

- Time is allocated in PSHE and form time to discussions of what constitutes appropriate behaviour and why bullying and lack of respect for others is never right. Pupils are encouraged to speak out when they feel sad, anxious, worried etc.
- Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.
- EQPrep Chat Sessions at Spencer House provide an opportunity for pupils to discuss any concerns they have or anything that is on their mind.
- We use opportunities, such as the annual National Anti-Bullying week and the annual Safer Internet Day to teach about the unacceptability of bullying and abusive behaviour and to promote the safe use of the internet and mobile phones, inside and outside of school.
- The pastoral care issues record referred to in our Anti-Bullying policy enables staff to discern trends in bullying and behavioural issues and to take appropriate measures based on this.

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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Merton Safeguarding Children Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and



perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of Merton LCSE, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Merton LSCE and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School handles sexting in accordance with its Anti-Bullying Policy.

In the event of disclosures about peer on peer abuse, all pupils involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by one of the School's DSLs and support from external agencies will be sought, as appropriate. When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other pupils (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

#### **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Merton Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil and/or;
- possibly committed a criminal offence against or related to a pupil and/or;
- behaved towards a pupil in a way that indicated that 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.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with pupils in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. If an allegation is reported to another DSL, the DSL will keep the Head informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head or one of the DSLs is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of Governors and the Merton designated officer. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer, WT and KCS/E when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCS/E* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer

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

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. All members of staff, governors and volunteers are informed of where the electronic copy of the School's Code of Conduct for Staff, which provides guidance on appropriate behaviour, is stored. Discussion of the procedures set out in that document forms a vital part of our induction procedures. Suspicions of inappropriate behaviour or abuse by a colleague should always be reported to the Head. Appendix D sets out the full Code of Conduct for Staff.

## **ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS**

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

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

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

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

## **STAFF POLICY / CODE OF CONDUCT**

The School's Codes of Conduct can be found on the School's website as well as an Appendix to this Policy. The aim of the Code of Conduct is to provide clear guidance regarding behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

## **Transporting pupils**

Pupils should only be transported by School minibuses, in accordance with the Minibus Policy and the Supervision Policy. In exceptional circumstances a pupil will be allowed to travel with a teacher provided this has been agreed to by her parents and the Head/Deputy Head.

### **Safer Employment Practices – checks for new recruits**

The Study follows the Government’s recommendations for the safer recruitment and employment of staff who work with children. The Study has a **Recruitment Policy** which forms part of its Safeguarding Policy. All members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to the statutory child protection checks before starting work. Wherever possible music lessons will take place in rooms with glass doors which are visible to the public. All governors, regular volunteer helpers, contractors working regularly during term-time, such as contract catering staff, are also vetted. The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed. Our policies are reviewed by governors annually.

For staff employed by another organisation and working with Study pupils (eg. supply agency staff, staff at venues visited by pupils) assurances that appropriate child protection checks and procedures are in place will be sought.

The School’s protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised are set out in the School’s Recruitment Policy.

### **Safer Employment Practices – staff reporting duties**

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Head immediately. Staff are reminded of this duty on an annual basis. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

The Childcare Act 2006 apply to those providing early years childcare or later years childcare, including before school and after school care, to children who have not attained the age of 8 and to those who are directly concerned in the management of that childcare. All relevant staff at The Study Prep have signed a declaration confirming that they are not disqualified by virtue of these Regulations. The School records all checks of staff employed to work in or manage relevant childcare including the date disqualification checks were completed. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate. These checks form part of the School’s safer recruitment practices.

## **MANAGEMENT OF SAFEGUARDING**

The School’s DSL is Joanna Gay, the Deputy Head.

The deputy DSLs are Vicky Ellis (Head) and Sue Johnson (Head of Early Years). They are the individuals to whom reports should be made in the absence of the DSL. This ensures that the required cover for the DSL role is in place at all times.

The DSL and DDSL’s contact details can be found on the Key Contacts page at the beginning of this policy.

The DSL’s role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL’s responsibility is to maintain an overview of safeguarding within the School, to establish and maintain open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School’s policies and procedures in practice.

The DSL works with the governors to review and update the School's Safeguarding Policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

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

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL the DDSLs will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the DSLs can be contacted via the School Office.

Full details of the DSL's role can be found at Annex B of *KCSIE 2021*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

The DSLs meet with the Governor responsible for Safeguarding at least once a term to review the efficacy with which the School's duties are being discharged. The Safeguarding Governor reports to the Governing Board at each meeting. Once a year the Head and the Governing Body undertake an annual review of Safeguarding Policies and Procedures, including an update and review of the effectiveness of procedures and their implementation. The Head carries this out by updating the Merton Council Safeguarding Audit form. If any deficiencies are highlighted by this review or at any other time, they will be addressed immediately. They will also approve amendments to child protection arrangements in the light of changing regulations or recommended best practice. Detailed minutes of these meetings are kept for reference. The Chair of the Governors and/or the Governor with responsibility for Safeguarding are aware of their duties to liaise with the relevant Local Authorities if the need arose (in line with the general duty for all staff to make a referral if they felt there was a safeguarding issue which was not being addressed).

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

The School's records on child protection are kept locked in the Head's office at Wilberforce House, and are separated from routine pupil records. Access is restricted to the DSLs. The Head holds a copy of the DfE's guidance *working together to Safeguard Children 2018*, *Safer Recruitment in Education*, *Information Sharing 2018*, *What to do if you're worried a child is being abused 2015*, *Keeping Children Safe in Education 2021* and *Prevent Duty Guidance 2015*.

## **Whistleblowing Policy**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and that such concerns will be taken seriously by the senior leadership team. The Study Prep values its staff and will seek to support them in reporting and dealing with concerns. The School has a Whistleblowing Policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation. No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern under the Whistleblowing Policy. If a member of staff believes that they have suffered such treatment, they should inform the Head immediately. If the matter is not remedied, the member of staff should raise it formally using the Grievance Procedure.

Where a staff member feels unable to raise an issue with their employer or feels that their concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (Monday – Friday 8am to 8pm) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## STAFF TRAINING

The DSLs regularly undergo refresher training every two years. The purpose of this training, as stated in Keeping Children Safe in Education (2021), is to enable them to:

- encourage a general culture of listening to children by all staff and taking account of their wishes and feelings
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand how to work with Merton LA in its approach to Prevent duties and harmful sexual behaviours
- ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- be able to identify children at risk of radicalisation
- be able to keep detailed, accurate and secure written records of concerns and referrals

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

Appendix C sets out the DSL's job description and further details of the required training content. Induction and training are in line with KCSIE 2021 and current advice from Merton LSCE.

All new staff (including teaching and non teaching staff, peripatetic and contract staff working within the School will be provided with induction training that includes:

- the School Safeguarding Policy
- the role and identity of the DSL(s)
- the School Behaviour Policy
- the School Anti-Bullying Policy
- the School' Staff Code of Conduct
- the School IT Acceptable Use Policy
- the School Whistleblowing Policy
- the School Attendance Policy;
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE 2021*
- *online safety*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE (and Part five of KCSIE)*

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

Those contractors who have contact with pupils are required to be trained in child safeguarding by their employers and will be briefed by The Study on child safeguarding. Temporary staff and volunteers are provided with the School's Staff Code of Conduct, details of the DSLs and the Safeguarding Policy.

The only adults who work or visit the school who are exempted from this requirement are:

- Cleaners whose hours of work mean that they do not have contact with pupils.
- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a visitor lanyard by our receptionist and who are escorted throughout their visit.
- Contractors working on a designated site that is physically separated from the rest of the school who are required to sign in and out at their site office and to wear security badges at all times
- Contractors working during the school holidays.

All staff are also required to:

- Read Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via staff meetings
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by training and follow up discussion and questioning
- Receive training in safeguarding and child protection regularly, in line with advice from Merton Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via staff meetings and via email.

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

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

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation.. The Compliance Officer together with the DSL and Head review the Policy on an annual basis. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

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

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

### **Teaching Children How to Keep Safe and On-line Child Protection**

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to support children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The aim of these systems is to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help

manage online behaviour that can increase a child's likelihood of, or causes, harm. In school, all internet access is protected by the Sophos XG system which blocks access to unsuitable websites, including those with terrorist and extremist material. As part of the computing curriculum, pupils are taught about the safe use of the Internet. Time is spent on subjects such as 'deception awareness' training and pitched on an age appropriate basis. In particular, pupils in Years 5 and 6 are taught about subjects such as the use and impact of social media. Pupils are taught how to use IT systems in accordance with the School's Acceptable User Policy. The Computing Coordinator arranges meetings for parents at which information about safe use of the internet is shared on an annual basis. Topics covered include the internet and risks of bullying, grooming and radicalisation and will reflect topics covered in the curriculum. Further detail of the School's approach to online safety can be found in the School's E-Safety Policy Acceptable Use of IT policy and Digital Camera and Mobile Phone Policy which supplements its Safeguarding Policy. These policies also include detail on the use of mobile technology in School and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems. Pupils and parents are required to sign a Computing Agreement and Code of Conduct.

### **Relationships Education and/or Relationships and Sex Education**

Relationships Education and/or RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching Relationships Education and/or RSE.

Relationships Education and RSE forms part of the School's PSHE programme.

### **Arrangements for Safeguarding issues away from School or out of School hours**

Any concerns about safeguarding on a school trip or visit will be addressed by the group leader who will liaise with the Head as soon as possible to discuss the detail and proposed course of action.

### **Looked after children**

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

Joanna Gay is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Homestay and hosting during exchange visits**

Currently The Study does not undertake exchange visits or trips which entail homestay and hosting by families. However were this to change in the future, the School will follow the guidelines contained in Annex E of KCSIE 2021.

### **Private fostering arrangements**

Where a child is looked after by someone other than a close relative, the Local Authority will be informed. Close relatives include grandparents, step-parents, aunts and uncles, brothers and sisters. A private fostering arrangement is made with someone who is not a close relative (e.g. cousin, great aunt, friend of the family or someone willing to enter into a private fostering arrangement) with the intention that it should last for 28 days or more.

### **Arrangements for Visiting Speakers**



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

The School will carry out a vetting procedure in advance of a visiting speaker attending the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

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

Visiting speakers, whilst on the School site, will be chaperoned by a school employee at all times.. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

Susan Johnson is the DSL for the School's Early Years setting. Her contact details are set out in this Policy.

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Mobile Phone and Digital Camera Policy, in the E-safety Policy, in the IT Acceptable Use Policy and in the Staff Code of Conduct. Staff must report any misuse of mobile phones by pupils, staff, helpers or students to the Head. Staff and pupils must not use their mobile phone for taking photographs of pupils, either in School or on outings. The School allows staff to bring in personal telephones and other devices for their own use, provided that they are used only at appropriate times, e.g. during breaks, and do not distract the member of staff from carrying out their normal duties. Mobile phones should be on a 'silent' setting during working hours. Staff must ensure there is no inappropriate or illegal content on their personal device. Mobile phones and devices must be stored away with all other personal belongings in classroom cupboards. Mobile phone calls may only be taken at staff breaks or in the staff member's own time. Further information relating to use of mobile phones and digital cameras is set out in the Digital Camera and Mobile Phone Policy. Parents are not permitted to use their mobile phones or cameras in the EYFS setting without permission from the Head of EYFS.

### **Duty to notify Ofsted**

In relation to our nursery/EYFS setting, the School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

In relation to our nursery/EYFS setting, the school will inform Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

## **COMPLAINTS**

A copy of the school's Complaints Procedure is available on the website or from the School Office and can be sent on request.

**RELATED POLICIES**

Anti Bullying Policy

Attendance Policy

Acceptable Use of IT Policy

Complaints Policy

Digital Camera and Mobile Phone Policy

E Safety policy

Preventing Extremism and Radicalisation Policy

Recruitment Policy

Whistleblowing Policy

**Last review date of policy: July 2021**

### **KCSIE defines the types of abuse as follows:-**

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate online abuse. They may be abused by an adult or adults or another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion

and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Upskirting:** is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm... Although this harassment is known as "upskirting", anyone of any gender can be a victim. Photos can be taken under any item of clothing. Please note that staff are at risk of harassment in this way as well as pupils.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and NSPCC website. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

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

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse which occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and /or through violence or the threat of violence. Different forms of harm often overlap, perpetrators may subject children to multiple forms of abuse. Children can be exploited by adult males or females, as individuals or in groups or may be exploited by other children. There are a range of factors which could make a child more vulnerable to exploitation:

- age
- gender
- sexual identity
- cognitive ability

- learning difficulties
- communication ability
- physical strength
- status
- access to economic or other resources

**Child sexual exploitation(CSE):** CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). **CSE can be a once off occurrence or a series of events over time, either opportunistic or organised abuse. It may be accompanied by violence or threats of violence.**

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education
- 

**Child criminal exploitation (CCE):**

CCE does not always involve physical contact; it can also occur through the use of technology. The victim may have been criminally exploited even if the activity appears consensual. The experience of girls who are criminally exploited can be different to that of boys. Children who are criminally exploited may be at higher risk of sexual exploitation.

Some specific forms of CCE can include children being forced or manipulated to work in cannabis factories, into transporting drugs or money across county lines shoplifting or pickpocketing, or to threatening/committing serious violence to others..

Some of the following can be indicators of CCE:

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

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

### **County lines:**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. This activity can occur locally as well as across the UK.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

### **Mental health:**

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

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

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

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

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools.

### **Serious violence:**

All staff should be aware of the indicators which may signify children who are at risk from , or are involved with serious violent crime. This may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance

- signs of self harm
- a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions

The following are a range of risk factors which increase the likelihood of involvement in serious violence such as;

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

#### **So called ‘honour based’ abuse (HBA):**

**This** encompasses crimes or incidents which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing:

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are considered abuse. If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the DSL or a deputy. As appropriate the DDSL will activate local safeguarding procedures.

**FGM** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of a child abuse. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

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

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care. If in any doubt, staff should speak to the DSL.**

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

that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School's local safeguarding procedures.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 32-36. . School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Radicalisation:**

**Children are vulnerable to extremist ideology and radicalisation. Protecting children from this risk should be part of a schools' safeguarding approach.**

- **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces, whether in this country or overseas..
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as family or friends may contribute to vulnerability.. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. The Prevent duty should be seen as part of the schools' wider safeguarding obligations. Designated safeguarding leads and senior staff should familiarise themselves with the Prevent duty guidance: for England and Wales.

**Special educational needs and/or disabilities** Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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



**Lesbian, gay, bi or trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Domestic abuse:**

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, economic and emotional, as well as coercive and controlling behaviour. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationships and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

**Child abduction and community safety incidents;**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. This can be committed by parents or family members, by people known to the victim and by strangers.

Other community safety incidents in the vicinity of the school can raise concerns amongst parents and children, for example people loitering nearby.

**Children with family members in prison:**

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

**Homelessness:**

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

**Children who go missing from school:**

A child going missing from school, particularly repeatedly, can be a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. The School's procedure for dealing with children who go missing can be found in the School's Attendance Policy. All unexplained and/or unauthorised absences will be followed up in accordance with this.

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

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

**Modern Slavery:**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including:

- sexual exploitation
- forced labour
- slavery
- servitude
- forced criminality

- and the removal of organs.

Further support is available in the Modern Slavery Statutory Guidance.

### **Cybercrime:**

**Cybercrime is criminal activity committed using computers and/or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber dependent crime. If there are concerns about a child in this area, the DSL should consider referring into the Cyber Choices programme.**

### Manage referrals

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children’s social care as required;
- Support staff who make referrals to local authority children’s social care;
- Refer cases to Prevent where there is a radicalisation concern as required;
- Support staff who make referrals to Prevent;
- Refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

### Work with others

- Liaise with the Head to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

### Undertake training

The DSL (and any deputies) should 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 DSL should undertake Prevent awareness training. 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, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School’s safeguarding policy and procedures especially for new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;

- 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 SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff

#### **Raise Awareness**

- The DSL should ensure the School safeguarding policies are known, understood and used appropriately;
- Ensure the relevant safeguarding policies are 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 child protection policy is available publicly and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the local LSCE to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### **Child protection file**

When children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

#### **Availability**

- During term time the DSL (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns.