SAFEGUARDING AND CHILD PROTECTION POLICY

Thomas's operates as a group of schools with a similar ethos and values. All safeguarding procedures follow statutory guidance and are consistent across the group.

There are designated safeguarding personnel in each of the schools, all of whom liaise closely with the local authority and other external agencies. Key contact details for each school can be found via the links below.

This policy should be read in conjunction with other school policies which form the school's integrated safeguarding approach: Anti-Bullying Policy, Attendance Policy, Behaviour Policy, Code of Conduct, Complaints Policy, Confidentiality Policy, COVID-19 Policy, ICT Acceptable Use Policy, Medical Care Policy, Online Safety Policy, Personal Devices and Photography Policy, Relationships and Sex Education Policy, Safer Recruitment Policy, Staff Code of Conduct, Whistleblowing Policy.

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1.   APPLICATION

This policy applies to proprietors, staff, parents, volunteers, contractors and visitors to the School. It applies to all pupils, including those in the EYFS, on and off the school site whilst they are the responsibility of the School. Whenever the term 'staff' is used within this policy, it applies to all categories of staff, including supply and self-employed staff, contractors, volunteers, students and those on work experience.
It should be noted that the term "children" includes everyone under the age of 18.

2.   KEY PERSONNEL AND CONTACT DETAILS – SCHOOL SUPPLEMENTS

There is a Designated Safeguarding Lead (DSL) in every school along with a number of deputies. The contact details of these staff and the contact details for the Local Authority and the Local Safeguarding Children Partnership for each school can be found in the school supplements below.

Thomas's Battersea Safeguarding and Child Protection Key Personnel and Contact Details
Thomas's Clapham Safeguarding and Child Protection Key Personnel and Contact Details

Thomas's Fulham Safeguarding and Child Protection Key Personnel and Contact Details
Thomas's Kensington Safeguarding and Child Protection Key Personnel and Contact Details

3.   INTRODUCTION

Safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. Safeguarding means:
*   protecting children from maltreatment;
*   preventing impairment of children's mental and physical health or development;
*   ensuring children grow up in circumstances consistent with the provision of safe and effective care;
*   taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as in need and/or suffering or likely to suffer significant harm. This document includes child protection procedures which detail how to respond to concerns about a child.

"Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child." (Keeping children safe in education (KCSIE September 2021).

This policy pays due regard to:
Keeping children safe in education (KCSIE) (September 2021)
Working together to safeguard children (WT) (2018 updated 2020)
Prevent Duty Guidance (2015 updated 2021)
Statutory Framework for the Early Years Foundation Stage 2021
Advice and guidance from the Local Safeguarding Children Partnership.

The school also follows DfE guidance on action required during the Covid pandemic, currently: Schools COVID-19 operational guidance (August 2021)
Non-statutory interim supplement to *KCSIE: Safeguarding and remote education during coronavirus (COVID-19)*
Actions for early years and childcare providers during the Coronavirus (COVID-19) outbreak (August 2021)

A full list of guidance which has informed this policy may be found in Section 19 of this policy.

4.   PRINCIPLES AND AIMS

Thomas's fully recognises its moral and statutory responsibilities for child protection and is aware that the safeguarding and promotion of the welfare of children is of paramount importance. The School endeavours to provide a safe and welcoming environment where children are respected and valued. We are alert to signs of all forms of abuse and neglect,

including the use of technology to abuse or exploit children, and follow procedures to ensure that children receive effective support and protection at the earliest opportunity.

The School is committed to safeguarding and promoting the welfare of children and young people and expects everyone to share this commitment thereby creating an open environment where staff, pupils and parents feel able to raise concerns, where concerns will be listened to and where support services and other agencies are readily involved.

The School's aims are:
- to establish and maintain an environment where both staff and children feel safe, secure, are encouraged to talk and are listened to;
- to ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- to acknowledge that all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection; to feel safe, secure, valued and respected, and feel confident;
- to ensure there are a variety of mechanisms for pupils to report any concerns and that children know that there are adults in the school whom they can approach if they are worried;
- to include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse, including the safe use of electronic equipment and access to the internet;
- to support children in recognising when they may be at risk and how to get help when they need it;
- to provide early help to pupils and families;
- to have effective procedures for identifying and reporting cases, or suspected cases, of harm or neglect;
- to ensure staff are trained and understand their responsibilities to safeguard children and understand how to report **all concerns**, including those which may appear minor;
- to ensure all staff understand their responsibility to report any concerns about the conduct of staff members, volunteers or other adults, including 'low level' concerns;
- to support those children who have suffered harm or neglect;
- to identify, monitor and support those pupils who may be in need of additional support from other agencies apart from Children's Social Care, e.g. Child and Adolescent Mental Health Services (CAMHS);
- to ensure that children on the school register, of compulsory school age do not miss out on parts of their education through continuous absenteeism;
- to work with other agencies to ensure adequate arrangements to identify, assess and support those children who are in need and/or suffering significant harm or may suffer significant harm without appropriate intervention;
- to practise safer recruitment and ensure that all staff are recruited in accordance with the School's Recruitment Policy and KCSIE;
- to work closely with parents and ensure that they have an understanding of the responsibility placed on the school and staff for child protection.

5. ROLES AND RESPONSIBILITIES

5.1 The role of all members of staff
- to provide a safe environment in which children can learn;

- to foster a culture of trust between adults who work at the school and children who attend it;
- to read and understand, Part 1 of Keeping children safe in education and, for school leaders and those working directly with children, Annex B;
- to read and understand the School's Safeguarding & Child Protection Policy and Procedures i.e. this document;
- to know the identity of the DSL and Deputies;
- to understand their responsibilities to safeguard pupils;
- to undertake regular safeguarding training, at least annually.to be aware of the signs of abuse and neglect, including peer on peer abuse;
- to be aware that that even if there are no reports of peer on peer abuse, or any other form of abuse, it does not mean it is not happening, it may just not be being reported;
- to report to the DSL any concerns about pupils, however minor they may appear;
- to know how to respond to a child who discloses harm or abuse of any kind;
- to report to the DSL if they have a mental health concern about a child;
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes;
- to help pupils understand how to keep themselves safe and manage risk through PSHCE discussions and through all aspects of school life;
- to identify children at risk of being drawn into terrorism and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups;
- to build pupils' resilience to radicalisation by actively promoting fundamental British values and enabling them to challenge extremist views;
- to be alert to persistent absenteeism of any pupils and inform the DSL of any concerns;
- to consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding);
- to inform the DSL when they become aware of any private fostering arrangements;
- to be open, accepting and ready to listen to a pupil and to follow the procedures outlined in this policy in the event of a disclosure;
- to follow the school's code of conduct for staff;
- to set a good example by conducting themselves appropriately and maintaining suitable standards of conversation and interaction with and between pupils;
- to report to the head any concerns about the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children);
- members of staff are required to 'self-declare' if there are any changes to their own criminal record or if there is a change in their personal circumstances which may affect the 'disqualification' criteria as listed in the DfE Disqualification under the Childcare Act 2006 statutory guidance of February 2015;
- staff are encouraged to sign up for the DBS update service to enable future status checks to be made.

5.2   The role of the Designated Safeguarding Lead and Deputies

The Designated Safeguarding Lead is a member of the Senior Leadership Team and has the lead responsibility for all child protection matters in the school. The DSL is the person to whom anyone working in the school is required to report any concerns about pupils which relate to possible harm or abuse.

Their responsibilities include:

- actively promoting a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures;
- acting as source of support and expertise for staff on matters of safeguarding;
- ensuring that the school's relevant policies are known and used appropriately;
- ensuring appropriate action is taken when a concern is raised, including referral and liaison with other agencies when required;
- understanding the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes;
- reporting to the Principal for safeguarding termly and contributing to the annual review of safeguarding.

A detailed breakdown of the responsibilities of the DSL can be found in **Appendix 5** of this policy and in Annex C of KCSIE.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

The Deputy Designated Safeguarding Lead(s) are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils.

During term time, the DSL or their deputy(ies) will be available during normal school hours, either in school, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns. During the holidays, there is no guarantee of immediate availability but most DSLs would be accessing emails fairly regularly.

5.3   The role of the Head
- To actively promote a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures.
- To create a safe environment and a caring ethos within the school.
- To have read and understood all parts of Keeping children safe in education thereby ensuring that the school's policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 (including Annex B) and the school's Safeguarding and Child Protection Policy are read and understood that procedures are implemented and followed by all staff.
- To allocate sufficient time, training and resources to enable the DSL and deputy to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- To ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding children;
- To ensure that pupils' safety and welfare is addressed through the curriculum and related policies (Anti-bullying, Behaviour, Equal Opportunities, Online Safety, PSHCE).
- To ensure pupils are taught about keeping safe, including when online.

- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To be aware of any off-roll notification should there be safeguarding concerns and to follow this up in conjunction with the DSL.
- To be aware of the possibility of private fostering arrangements and ensure that Registrars take steps to verify the relationships of the adults to any child who is being registered at the school.
- To make parents aware of the School's Safeguarding and Children Protection Policy on a regular basis (usually in the Bulletin at the start of each term).
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To know how to deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To receive required training to understand safer recruitment processes and ensure that safeguarding awareness is covered in every interview to recruit new staff with at least one member of each interview panel having undergone Safer Recruitment training.
- To monitor the effectiveness of this policy and procedures and liaise with the Principals and senior leaders over any proposed amendments.

5.4   The role of the Principals
- To have strategic leadership responsibility for safeguarding.
- To ensure that safeguarding is given the highest priority at all times and actively promote a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures.
- To ensure a Principal is nominated (or a representative on behalf of the principals) to be responsible for safeguarding.
- To ensure there is an effective Safeguarding and Child Protection Policy in place, which is consistent with KCSIE and the requirements of Local Safeguarding Partners.
- To ensure that each school has a Designated Safeguarding Lead who is a member of the Senior Leadership Team, is sufficiently independent of the Principals and has undergone regular inter-agency training at least every two years.
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To ensure the Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and updated if needed, and that this review includes the effectiveness of procedures and their implementation and ensures that the school contributes to inter-agency working in line with "Working Together" (2018), through effective communication and co-operation with local agencies.
- To ensure the policy is available publicly on the school website.
- To ensure that all staff read and understand at least Part 1 and Annex B of Keeping children safe in education.
- To ensure that mechanisms are in place to assist staff at all levels to understand and discharge their role and responsibilities as set out in Keeping children safe in education.
- To ensure compliance with statutory safeguarding and child protection requirements.

- To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place, including anti-bullying and behaviour in order to safeguard and promote children's welfare.
- To ensure there is a comprehensive and effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.
- To ensure that the school holds at least two emergency contact numbers for each child in case of emergencies and in case there are welfare concerns at home.
- To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all appropriate checks are carried out on all staff, including those working in a management role as well as those working with pupils, before starting their employment.
- To provide sufficient resources to enable appropriate training to be given to the Head, the DSL and other staff at regular intervals, including annual safeguarding updates.
- To ensure that the school has procedures for dealing with allegations against members of staff that comply with KCSIE and Local Safeguarding Partners.
- To utilise the experiences and expertise of staff when shaping safeguarding policies and give opportunities for staff members to contribute and shape safeguarding arrangements and child protection procedures.
- To ensure IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking which may place unreasonable restrictions on what children can be taught.
- To have policies and procedures in place about children accessing the internet on their phones while in school. (See Online Safety Policy).
- To have policies and procedures in place relating to the use of cameras and technology within the EYFS.

6.   INDUCTION AND TRAINING

When accepting a role at Thomas's all new members of staff are required to sign to confirm they have read, understood and agree to comply with the requirements outlined in:
- Thomas's Safeguarding and Child Protection Policy and Procedures;
- Part 1 of Keeping children safe in education;
- Thomas's Disclosure of Disqualification under the Childcare Act briefing paper (amended September 2018);
- Thomas's Staff Code of Conduct.

6.1   Induction
It is important that all staff have training and build capacity to enable them to recognise the possible signs of abuse and neglect and know what to do if they have a concern.

All newly recruited staff (teaching and non-teaching and including visiting peripatetic members of staff and external club leaders) are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping children safe in education, Part 1 and Annex B;
- Thomas's Safeguarding and Child Protection Policy;
- Thomas's Staff Code of Conduct;
- Thomas's Online Safety Policy;

- Thomas's Whistleblowing Policy;
- Thomas's Behaviour Policy;
- Thomas's Anti-bullying Policy;
- The identity and the role of the DSLs and Deputies;
- Prevent online training;
- Procedures on managing children who go missing from education (in Attendance Policy);

The school takes a risk-based approach to the level of information provided when training other temporary staff, contractors and volunteers.

6.2 Staff Training

- Members of staff are given regular updates (at a minimum annually) on safeguarding issues, including advice on dealing with peer on peer abuse and online safety.
- Full refresher courses ensure everyone is re-trained every three years.
- All members of staff have access to the online safeguarding training programme "Educare" and are required to complete courses regularly in response to changes in legislation or to update their safeguarding knowledge.
- Training is provided about the duty to 'prevent terrorism', using the 4 main themes from The Prevent Duty – Risk Assessment, Working in Partnership, Staff Training, IT Policies.
- A record is kept of staff training, including the type of training and dates.

6.3 DSL Training

The DSLs and deputies undertake inter-agency training every two years and take part in annual updates of specific safeguarding matters as required, in line with Annex C of KCSIE. They also undertake Prevent training.

The DSLs across the Thomas's group meet regularly to share good practice. They are also encouraged to attend network meetings and external courses to further their expertise.

6.4 Training for Principals

The Principal responsible for safeguarding or the person nominated by them is trained to DSL level and undertakes refresher training every two years, as a minimum. The Principals also undertake regular safeguarding refresher training.

7. CONCERNS ABOUT A CHILD (also see flowchart in Appendix 1)

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight and respectful challenge, as well as effective recording, reporting and monitoring systems. It is important that a child in need or at risk of harm receives the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:
- identify and refer **any concerns** about a child;
- keep clear written records;
- listen to the views of the child;
- reassess concerns when situations do not improve;
- share information quickly and challenge inaction.

7.1 Recognising indicators of abuse

- Staff in schools are uniquely placed to observe outward signs of neglect or abuse, unexplained changes in behaviour or failure to develop. Children who are victims of abuse often display emotional and behavioural difficulties. Staff should also be aware that children with special educational needs or other vulnerable groups may be especially at risk of abuse and, therefore, extra care should be taken to correctly interpret apparent signs of abuse or neglect, acknowledging that behaviour, mood or injury may relate to possible abuse and not just their SEN or disability.
- It is more common for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. Members of staff may witness a change in a pupil's behaviour or art or written work may show signs of distress. Staff should be aware that younger pupils may talk about, or demonstrate behaviour, through their play which gives rise to safeguarding concerns.
- There may also be concerns raised about a parent's or carer's interaction with a pupil or issues such as parental substance misuse, domestic abuse or mental health may arise.
- If there are any concerns at all these must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of what appears to be more minor events. It is therefore vitally important that all events are reported and recorded.

Appendix 3 of this policy gives details of some of the types of abuse and safeguarding issues with which staff should be familiar.

7.2 What to do if there are concerns about a child

- **If a member of staff is concerned about a pupil the matter should be referred to the DSL, or the deputy in the DSL's absence, immediately.**
- If at all possible, members of staff should speak directly to the DSL or a DDSL first to discuss their concerns. If this is not possible, they should send a written report to the DSL via email or via the safeguarding form on the school's TLP
- In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day.
- A written record should always be made by the member of staff reporting the concern.

7.3 Dealing with a disclosure by a pupil

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

If a child reports, following a conversation you have initiated or otherwise, about any risks to their safety or wellbeing the following procedure should be followed:

- **Listen to the pupil;** take their allegation seriously and reassure them that you will take action to keep them safe.
- **Remain calm** and do not over-react – the child may stop talking if they feel they are upsetting you.

- **Do not interrupt** if he or she is recalling a significant event; the first account is usually the most accurate. However, you may like to offer reassuring nods or words of comfort eg "I want to help," "You are doing the right thing in talking to me".
- **Do not be afraid of silences;** remember how hard this may be for the child.
- **Do not guarantee confidentiality**; referrals may have to be made in order to safeguard the pupil. At an appropriate time tell the child that in order to help them you must pass the information on.
- **Do not automatically offer any physical touch as comfort**. It may be anything but comforting to a child who has been abused.
- **Do not admonish the child for not disclosing earlier**. It may be intended to be supportive but they child may interpret it that they have done something wrong.
- **Do not cross-question the pupil**. Ensure that any questions that need to be asked are as open as possible and do not lead the pupil. Let the pupil tell what he/she wants and no more. Use T.E.D, (Tell/Explain/Describe); e.g. do not ask 'leading' questions such 'Was it X who did this to you? Is it true that …? Rather say 'Tell me what happened. What happened next? How did you feel? The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the pupil to become anxious and retract their information.
- **Tell the child what will happen next.** The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- **Report orally to the DSL as soon as possible** but certainly on the same day. If the DSL is not available, report to the Deputy DSL, the Head or a member of the SLT.
- **Keep the matter confidential** and not discuss them with anyone other than the DSL.
- **Make a written note of the discussion as soon as possible** and at the latest before the end of the day. Note time, date, place, people present and what was said, using the child's own words as much as possible. The notes may be needed in subsequent court proceedings so must be as accurate as possible. All notes should be signed and dated.
- **Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. If injuries are clearly visible they should be recorded on a Body Map.
- **Do not investigate further** or speak to anyone else about what you have been told; your role is to listen, record and report concerns to the DSL.
- **Seek support if you feel distressed.**

7.4   Recording safeguarding concerns
- The DSL and DDSLs have full access to CPOMS to enable them to record actions and store all safeguarding records securely.
- All safeguarding concerns reported by staff must be recorded in writing.
- When recording concerns, staff should record facts and information only, avoiding personal opinion.
- Any conversations directly with a pupil or overheard which raise concerns must also be reported.
- The record should include the date, time and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
- The record should be made as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed

with anyone else. It is important to record as much as can be remembered, using the pupil's own words.

- General terms such as inappropriate language/behaviour should be avoided - be as specific as possible. Describe the actual behaviour and/or state the specific language used.
- Staff must not investigate further or speak to parents or other staff before discussing a concern with the DSL. The DSL will determine the next course of action.
- On receipt of a concern the DSL will decide and record the action taken. Action will depend on the nature of the concern. It may include one or more of the following:
  - o Monitoring the pupil in school;
  - o A discussion with parents;
  - o Early help intervention from the school and/or 'Early Help' request another agency;
  - o Referral to Children's Social Care;
  - o Referral to the LADO;
  - o Report to the police.

7.5   Preserving evidence
- All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be safeguarded and preserved.
- If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- Staff should not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if incidents of sexting, nudes or semi-nudes are found, as to forward them is illegal.
- If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the pupil to delete it.
- Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.
- Report the matter to the DSL immediately.
- Further advice can be found in UKCIS Education Group *Sharing nudes and semi-nudes: advice for education settings working with children and young people.*

7.6   Early Help
- Early help means providing support as soon as a problem emerges at any point in a child's life. All school staff should be prepared to identify families and/or children who may benefit from early help as providing support at this stage is more effective in promoting the welfare of the child than reacting later.
- Additional support systems in school may form part of early help strategies e.g. pastoral school support, counsellor, school mentors and should feed into Local Authority early help measures as required. Evidence is kept of all early help interventions.

- In the first instance staff should discuss early help requirements with the DSL. The DSL will then take the lead but staff may be required to support other agencies and professionals in an early help assessment. Chapter 1 of Working together to safeguard children (2018) provides detailed guidance on the early help process.

7.7   Referral to Children's Social Care

- Referrals about a child must be made to the borough in which the child resides. The policy of the school requires that all referrals are made by the school's DSL; however, in exceptional circumstances staff may raise concerns directly with Children's Social Care themselves. Anyone can make a referral.
- If at any point there is a risk of immediate serious harm to a pupil, a referral should be made to Children's Social Care or the police immediately.
- If there is room for doubt as to whether a referral should be made, the DSL will consult with Children's Social Care.
- If the initial referral is made by telephone, the DSL will confirm the referral in writing, following local referral procedures, within 24 hours. If no response or acknowledgement is received within one working day the DSL will contact Children's Social Care again.
- The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation.
- Children's Social Care will advise the school on the next course of action following local procedures on thresholds of need. This may include:
  o **Early Help** from within the school and/or external agencies (see above);
  o **Section 17** assessment (the child is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989 by a social worker);
  o **Section 47** assessment (under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. In some circumstances, there may be a need for immediate protection whilst an assessment and enquiries are carried out.

If after a referral the child's situation does not appear to be improving, the DSL (or person who made the referral) should press for reconsideration to ensure their concerns have been addressed. All referrals and reconsiderations should be recorded.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school or by the Local Authority. Staff can call 0800 028 0285 or email help@nspcc.org.

7.8   Information sharing
Information will be shared according to the HM Government guidance Information Sharing (July 2018). This states that staff should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. **Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.** The guidance states that the information shared should be:
- **Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.

- **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
- **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
- **Secure** - Wherever possible, information should be shared in an appropriate, secure way.
- **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.

The School will seek advice if there is ever any uncertainty about the sharing of information.

8.   Communication with Parents

All parents are aware from the school's website that the school has a safeguarding policy and is required to follow statutory guidance to safeguard its pupils.

The school aims to work closely with parents to help support pupils and their families; however, it will always put the duty of care to the pupil as its priority and will refer concerns if it considers a pupil is or may be at risk of harm or has suffered harm.

- The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. The reasons for the school's concerns will be explained along with the course of action the school intends to take.
- Referrals to Children's Social Care do not require prior parental consent. The DSL must act in in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
- Normally, when there are safeguarding concerns, the DSL will contact parents before making a referral. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

9.   DEALING WITH ALLEGATIONS AGAINST A MEMBER OF STAFF

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part 4 of KCSIE and the procedures of the school's Local Safeguarding Partners.

Allegations that might indicate that a person is unsuitable to work with children are where a person has:

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

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The following procedures relate to all members of staff, (including the self-employed, supply staff and contractors) Principals and volunteers or any other adults who are currently working in the school, regardless of whether the school is where the abuse is alleged to have taken place. After referral to the LADO, if an allegation applies to a person not directly employed by the school the person's employer will be notified. In such cases, any investigation will usually be led by the school although this will be determined by the LADO on a case by case basis. In no circumstances will the school simply cease to use supply or third-party staff for safeguarding reasons without involving the agency/employer and the LADO.

9.1   Reporting an allegation or concern

Member of staff: A member of staff receiving an allegation of abuse about another member of staff, or with concerns about a member of staff, should report this immediately to the Head. If the Head is absent, the report should be made to the Principal responsible for Safeguarding.

The Head: An allegation or concern about the Head should be reported to Tobyn Thomas, Principal, without the Head first being informed.

A Principal: If the concern is about a Principal the report should be made directly to the LADO for the borough in which the school is situated, without first informing the Principal.

An allegation about a Head who is also a Principal should be made directly to the LADO. In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to a Principal, the LADO should be contacted directly and without hesitation.

Concerns may be reported verbally, directly to the relevant senior member of staff or through the use of the neutral notification form, located on the TLP. Any members of staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

9.2   Informing the Local Authority Designated Officer (LADO)

- If the school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the school will contact Children's Social Care and, as appropriate, the police immediately
- An allegation of abuse by an adult **must always** result in a senior person at the school (as detailed above) contacting the LADO for the school's Local Authority who will advise on the next steps to be taken.
- Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases may be discussed without identifying individuals in the first instance and, following discussions, the LADO will advise what further steps should be taken.
- All discussions with the LADO must be recorded in writing.
- If an allegation is made against a current member of staff or volunteer, the school's priority is to:

- o deal with the allegation as a matter of high priority and without delay;
- o look after the welfare of the child – the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier;
- o investigate and support the person subject to the allegation – the case manager (usually the Head, unless the Head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- The school's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.

9.3 Procedures
a) The Head (or Principal) will record any basic information to establish the facts, including dates, times, locations and names of potential witnesses, any CCTV footage.
b) An initial assessment of the allegation will be made by the LADO and the Head (or Principal) to judge whether:
- there is need for immediate action to protect pupils;
- the allegation is demonstrably false;
- there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures.
c) If a decision is reached that no further action is necessary, this must be recorded by both the Head (or Principal) and the LADO, and agreement reached on what information should be put in writing to the member of staff who is the subject of the allegation and to the person(s) who made the initial allegation.
d) If the LADO advises that a strategy meeting is needed, or police or Children's Social Care need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have been consulted and have agreed what information can be disclosed.

9.4 Confidentiality and information sharing
- If further investigations are required before deciding how to proceed, the Head will decide, with the LADO, who will investigate; this may be an independent investigator. provided by the Local Authority.
- The Head (or Principal) will usually inform the accused person about the allegation after consulting the LADO. The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and the likely course of action explained, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be informed about the need for confidentiality and to avoid contact with any pupils or families involved in the investigation.
- The parents or carers of the child(ren) involved will be informed of the allegation as soon as possible, if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child will be told the outcome in confidence.

- The school will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Legislation prevents the "publication" of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- The Head will take advice from the LADO and other agencies to agree:
  o who needs to know and, importantly, exactly what information can be shared;
  o how to manage speculation, leaks and gossip;
  o what, if any, information can be reasonably given to the wider community to reduce speculation;
  o how to manage press interest if, and when, it should arise.

9.5   Suspension
In response to an allegation all other options will be considered before suspending a member of staff: suspension will not be the default option. An individual will be suspended only if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the school and the individual notified of the reasons.

The Head (or Principal), with advice from the LADO, will make the decision whether or not to suspend.

9.6   Allegation outcomes
Outcomes of allegations against members of staff may be defined as:
- **Substantiated** - there is sufficient evidence to prove the allegation;
- **False** - there is sufficient evidence to disprove the allegation;
- **Malicious** - there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **Unsubstantiated** - this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded** - to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

The School will not cease their investigations if the person leaves, resigns or ceases to provide their services. I t is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

If an allegation is unsubstantiated and the person returns to work, the school will support that person through offering for example, a phased return or a mentor.   The School will also consider how to manage the contact with the child(ren) and/or adults who made the allegation.

9.7 Record keeping and references

Allegations that are found to be malicious will be removed from personnel records. However, for all other allegations, the following information is kept on the personnel file of the person accused:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved
- A note of any action taken, and decisions reached and the outcome as
- categorised above
- A copy provided to the person concerned, where agreed by children's social care or the police;
- A declaration on whether the information will be referred to in any future reference.

Records provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

- Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
- Allegations that are proved to be unsubstantiated, false, malicious or unfounded should not be referred to in employer references.
- Substantiated allegations will be included in references; any information being purely factual and not including opinions.

9.8 Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If an allegation is substantiated and the person is dismissed, resigns, or otherwise ceases to provide his/her services or the school ceases to use the person's services, the school has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. A report will be made to the DBS within one month of the individual leaving the school.

- For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education.
- A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in _Teacher misconduct: the prohibition of teachers_ (October 2015). Further guidance is published on the TRA website.

9.9 Historical allegations

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

- Allegations against former members of staff or volunteers will be referred to the police. Historical allegations of abuse will also be referred to the police.
- Where the school has information to indicate that a former staff member is working with children in another location this will also be reported to the LADO in that location and to the senior management of the school where that member of staff is currently working.

9.10   Staff Concerns (Low-Level or Neutral Notification)

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school, including self-employed staff, supply teachers, volunteers and contractors.

There may be occasions when something occurs which causes a member of staff to have doubts about the behaviour of another adult towards a pupil, or another child. This may be considered a "**low-level concern"**.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone/other device;
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language, email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (school medical staff are exempt from this);
- any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

Staff must also report any low-level concerns as outlined above in section 9.1. Concerns may be reported verbally, directly to the relevant senior member of staff or through the use of the neutral notification form, located on each school specific area of the TLP. Any members of staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed. The Head may then share the concern raised with the DSL and agree action to ensure that it is followed up appropriately.

Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This is termed "**neutral notification**".

- When a low-level concern has been raised by a third party, the head (or principal) will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

- The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- All low-level concerns will be recorded in writing. The record will include:
    - o details of the concern;
    - o the context in which it arose;
    - o evidence collected by the DSL where the concern has been raised via a third party;
    - o the decision categorising the type of behaviour;
    - o action taken;
    - o the rationale for decisions and action taken;
    - o the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) .
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- The purpose of low-level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the school's Whistleblowing Policy.

10. SAFER RECRUITMENT *(see Safer Recruitment Policy for detailed information)*

The school is committed to safer recruitment and it follows the requirements for the safer recruitment and employment of staff in Part Three of KCSIE and Disqualification under the Childcare Act 2006 (DfE September 2018).

The ultimate responsibility lies with the Principals; however, the Heads and the school's HR department are responsible for implementing these procedures in practice.

At least one person in each recruitment process has had "Safer Recruitment" training.

10.1 Staff pre-employment checks
All staff are checked to ensure their suitability for their proposed role. Checks include:
- references;
- verification of identity;
- where appropriate, verification of qualifications;
- a medical fitness declaration;
- verification of right to work in the UK;
- overseas police checks (where applicable);

- an enhanced check with the Disclosure and Barring Service (DBS), including a Barred List check for those staff in regulated activity;
- a self-declaration to ensure compliance with regulations made under the Childcare Act 2006;
- a check that there is no teacher prohibition order by the (TRA) or any restrictions imposed by a similar overseas authority for those staff who have worked abroad;
- S128 (prohibition from management) checks are carried out on all Principals, Heads, Senior Leaders and Heads of Department.

All checks are recorded in the School's Single Central Register of Appointments.

10.2 Contractors
- Building contractors who work on the school site will be made aware of this policy.
- Long-term contractors who work in the school during term time will usually require DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the SLT deem this to be appropriate.
- During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors and their employees to have direct access to pupils in non-teaching times.

10.3 Supply staff/Staff employed by a third party
Supply agencies and employers will be asked to provide written confirmation that they have completed all the relevant checks on an individual being proposed to the school. On arrival, the school will verify the individual's original identity documents and DBS certificate.

10.4 Volunteers
- Risk assessments are carried out on all volunteers helping in schools to decide whether a DBS check is needed or not.
- Any volunteer who is deemed to be in regulated activity will be required to undergo an enhanced DBS.
- All parent readers and volunteers helping in schools on an unsupervised basis will therefore require an enhanced DBS check as well any volunteer who assists with activities involving personal care, eg helping young children get changed for swimming or PE.
- Parents volunteering to host overseas children on exchanges are required to have enhanced DBS checks. This requirement also applies to anyone living in their household, aged 16 or over, where the exchange pupil is to stay.

11. Extended school and off-site arrangements

- Where extended school activities are provided by and managed by the school, this Safeguarding and Child Protection Policy and procedures apply.
- If other organisations provide services or activities on the school's site the school will check that they have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.
- When Thomas's pupils attend off-site activities, including day and residential trips and work-related activities, the school checks that effective safeguarding arrangements are in place. For sessions offered by alternative providers the school

asks for written confirmation from that provider that all safeguarding vetting and barring checks have been carried out on their staff.
- All staff are bound by our Educational Visits and Off-Site Activities (EVOSA) Policy when arranging and organising off-site trips.

12.   SAFETY IN SCHOOL

A number of procedures are in place to ensure the safety of pupils in school.
- Entry to school premises is controlled by secure doors, and constant staff supervision or video surveillance.
- Members of staff wear name badges.
- Agency and supply staff have their identity checked to ensure that the person presenting at the school is the same person on whom the agency has provided checks. They must also present their DBS certificate when arriving at the school.
- Authorised visitors are logged in and out of the premises and asked to wear visitor badges. Unidentified visitors will be challenged by staff or reported to the Head or School Office.
- The presence of intruders and suspicious strangers loitering near the school will be reported to the Police and the LA so that other schools can be alerted.
- No internal doors to classrooms will be locked while pupils are present. All teaching rooms will have clear, unobstructed glass panels in the doors (except in a lockdown situation).
- Members of staff who work with children on a one to one basis are made particularly aware of policies and procedures with regard to safeguarding, as the nature of their work means they are more vulnerable to allegations being made against them. In addition, a pupil may see their individual lesson time as an opportunity to make a safeguarding disclosure.

13. ONLINE SAFETY *(see also ICT Acceptable Use Policy, Online Safety Policy, Personal Device Policy, Staff Code of Conduct)*

The school has separate policies which relate to technology which detail how pupils are kept safe in school and the response to any online safety incidents.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying;
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

The School's IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking access which may place unreasonable restrictions on what children can be taught.

There are policies and procedures in place about children having phones in school and accessing the internet on their phones while in school.

14. USE OF CAMERAS, MOBILE PHONES AND OTHER DEVICES, INCLUDING WITHIN THE EYFS *(see also ICT Acceptable Use Policy, Online Safety Policy, Personal Devices & Photography Policy, Staff Code of Conduct)*

- For members of staff, their use of personal mobile devices is governed by the schools' ICT (Acceptable Use) Policy. This prohibits the use of personal devices in the presence of pupils, except momentarily when required for 2 step verification log ins or on school visits or in the case of an emergency.
- Staff must not take video footage or photographs of pupils except for school purposes. School devices should always be used wherever possible.
- If personal devices are used, photographs or videos of pupils must be uploaded to the school's system as soon as possible and permanently deleted from the personal device.
- Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause distress.
- Parents should be aware that other parents in the school may object to photographs being taken which, inadvertently or otherwise, include their children. Therefore, no photograph or film taken in school may be published (this includes on any social media platform such as Instagram, Facebook, Twitter, YouTube or Vimeo - regardless of privacy settings - or in any other way) without the explicit consent of each person recorded and, in the case of a child, without the explicit consent of their parents.
- Therefore, any images taken must be for personal use only and should not be shared on social media.
- Other visitors, volunteers and contractors in school are not permitted to take photographs in any areas of the school without specific permission from the Head.
- Flash photography can cause distress or trigger seizures in those with medical conditions and therefore should not be used.
- CCTV is located around the school but is not installed in classrooms, changing rooms or loo areas.
- The general use of mobile telephones in all areas of the school (calls, texting and email) by parents and others is actively discouraged.

From time to time professional photographers are invited into the school to take group photographs or pictures of significant events; any professional photographers hired by the school will be subject to appropriate vetting checks and are expected to follow our ICT Acceptable Use Policy and Personal Mobile Device Policy when taking and/or publishing images.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

14.1   Pupils' mobile phones

Pupils in the older years in each school who can demonstrate a clear need for a mobile phone (such as for security when walking to and from school) may bring one into school. Each school requires that pupils' phones are either handed in to the School Office at the start of each day (Fulham & Kensington) or handed to the form teacher (Battersea & Clapham).

Any pupil who brings in any mobile device is required to sign and abide by the Personal Devices Pupil Agreement. See ICT (Acceptable Use) Policy and Agreements.

15.   PASTORAL AND SAFEGUARDING EDUCATION

Thomas's promotes the welfare of children through its whole school ethos and educates its pupils through Assembly programmes, the curriculum, including in PSHE and computing, through extra-curricular activities and via parents' forums.

Pupils are taught how to keep themselves safe, including online, and how to build resilience. They are given the information to identify situations and behaviour from others, including over the internet and through mobile technology, which could lead them into harm.

16. MECHANISMS FOR PUPILS TO REPORT CONCERNS

All pupils are made aware that they may report any concerns or worries to their class teacher or to any member of staff. There are numerous notices around the school to remind pupils to report any worries they may have.

There are also a number of other systems in place for pupils to report their worries or concerns. Across the schools these include but are not limited to: - worry boxes; iPad virtual worry box; Year 7 & 8 tutor system.

The School also conducts questionnaires to give pupils the opportunity to canvas the opinions of pupils and so they may express any concerns.

17.   PROMOTING AWARENESS OF CHILD WELLBEING

Pupil wellbeing has a high priority within the school and members of staff place great importance on spotting and supporting pupils who may be going through a difficult time.

If staff have any welfare concerns these should also be reported to the DSL. This enables the DLS to have a full overview of pupils, as welfare concerns may be linked with other issues surrounding a child.

Each school discusses welfare issues and a weekly confidential report is shared with teachers to enable them to share concerns and identify issues at an early stage. These concerns may be related to academic, behaviour or general welfare.

18.   REMOTE SCHOOLING

During any period of remote schooling due to COVID-19, be it a bubble, class or whole school group, Thomas's will continue to have regard to this policy and to KCSIE.

Additional safeguarding considerations when the school is operating remotely are listed in the Online Safety Policy.

Each school will usually have a trained DSL (or deputy) available on site during the school day. If this is not possible, a trained DSL (or deputy) will be available to be contacted via phone or online video. Where a trained DSL (or deputy) is not on site a senior leader will take responsibility for coordinating safeguarding on site.

All members of staff will be asked to be particularly alert to signs of stress in pupils and enable pupils to talk about how they are feeling. Any safeguarding concerns will continue to be passed to the DSL (or deputy DSLs) promptly and any necessary referrals made to the relevant agencies or services as usual. Additional support will be provided for pupils in school where appropriate and available.

Any emerging concerns with pupils at the on-site hub or observed during remote learning will be discussed with parents in the usual way, unless the information known, leads the DSL to believe this could place a pupil at risk of immediate and further harm, in which case a referral will be made to Children's Social Care without delay.

All parents / carers will be asked to inform the school if their child has experienced any key family changes (eg bereavements, changes in contact with key adults, significant events, health difficulties etc) so that school staff can ensure they can be effectively supported.

19.   LEGISLATION AND GUIDANCE

This policy pays due regard to the following statutory guidance and other government advice.   It also complies with other legal requirements and guidance and follows advice from the School's Local Safeguarding Partners (specific details in School Supplements)

1.   DfE statutory guidance 'Keeping children safe in education (KCSIE) (September 2021)
2.   DfE advice 'Sexual violence and sexual harassment between children in schools and colleges' (updated 2021) summarised in Part 5 of KCSIE
3.   The specific legal requirements in the "Safeguarding" section of Safeguarding and promoting children's welfare, Part 3 of the Statutory Framework for the Early Years Foundation Stage (September 2021)
4.   DfE Statutory Guidance 'Relationships Education, Relationships and Sex Education (RSE) and Health Education' (September 2021)
5.   Actions for early years and childcare providers during the Coronavirus (COVID-19) outbreak (August 2021)
6.   Schools' COVID-19 operational guidance (August 2021)

7. London Child Protection Procedures (6th edition 2020 amended March 2021)
8. Working together to safeguard children (WT) (2018 updated 2020)
9. Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (April 2020)
10. DfE guidance 'Teaching online safety in school' (June 2019)
11. Mental health and behaviour in schools: departmental advice (November 2018)
12. Disqualification under the Childcare Act 2006 (September 2018)
13. DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
14. Designated teacher for looked after children (February 2018)
15. DfE's Searching Screening and Confiscation Advice (January 2018)
16. DfE statutory guidance 'Children missing education' (September 2016)
17. Counselling in schools: a blueprint for the future (February 2016)
18. Teacher misconduct: the prohibition of teachers (October 2015)
19. Prevent Duty Guidance for England and Wales (originally issued March 2015 revised July 2015) ("Prevent")
20. Prevent is supplemented by non-statutory advice: The Prevent duty: Departmental advice for schools and childcare providers (June 2015) and
21. A briefing note for schools about the use of social media for on-line radicalisation (July 2015) The use of social media for on-line radicalisation (July 2015)
22. HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)
23. DfE statutory guidance 'Disqualification under the Childcare Act 2006' (February 2015)
24. Advice and guidance from the Local Safeguarding Children Partnership (see individual school supplement)
25. When to call the police, non-statutory guidance from the National Police Chiefs' Council

20. POLICY REVIEW RECORD

This policy will be reviewed at least annually		
Created: 2008	By:	Tobyn Thomas, Ben Thomas, Principals Jill Kelham, Vice Principal
Latest Review: November 2021	By:	Joanna Copland, Vice Principal Suzannah Cryer, DSL, Battersea Prep Anthony Douglas, DSL, Battersea Senior Helen Stewart-Morgan, DSL, Clapham Lee Walters, DSL, Fulham Jo Ebner, DSL, Kensington
Approved: November 2021	By:	Tobyn Thomas, Ben Thomas, Principals Simon O'Malley, Head, Thomas's Battersea Prep School Ben Thomas, Head, Thomas's Battersea Senior School Nathan Boller, Head, Thomas's Clapham Annette Dobson, Head, Thomas's Fulham Jo Ebner, Head, Thomas's Kensington
Next Review: January 2022	By:	Joanna Copland, Vice Principal Cross-School Leads

21. APPENDICES

Appendix 1: Procedure flowchart for raising a concern about a child
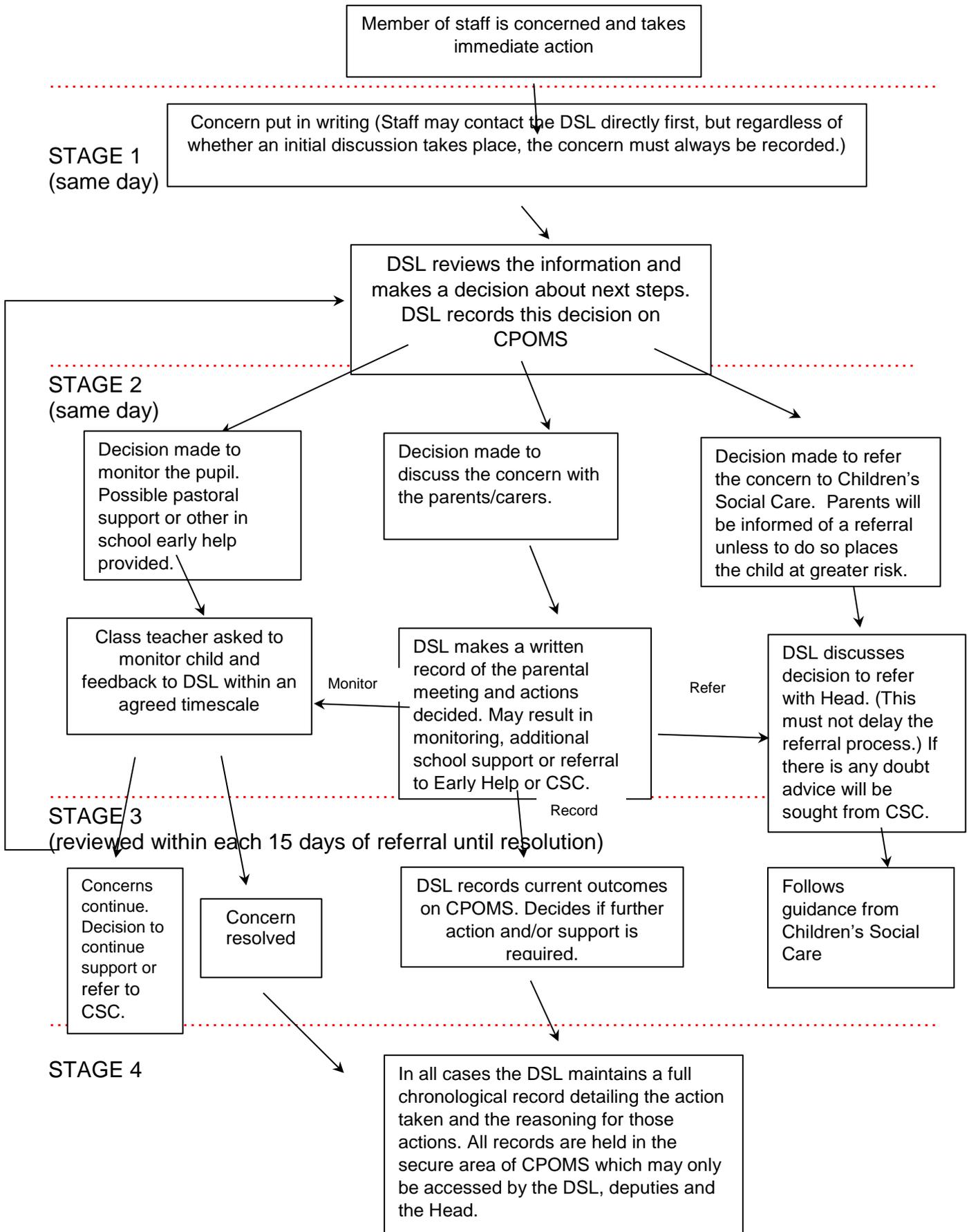Appendix 2: Roles and responsibilities of the Designated Safeguarding Lead and Deputies
Appendix 3: Definitions and signs of abuse
Appendix 4: Useful references and organisations

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 1

PROCEDURE FOR RAISING A CONCERN ABOUT A CHILD

Member of staff is concerned and takes immediate action

STAGE 1 (same day)

Concern put in writing (Staff may contact the DSL directly first, but regardless of whether an initial discussion takes place, the concern must always be recorded.)

DSL reviews the information and makes a decision about next steps. DSL records this decision on CPOMS

STAGE 2 (same day)

Decision made to monitor the pupil. Possible pastoral support or other in school early help provided.

Decision made to discuss the concern with the parents/carers.

Decision made to refer the concern to Children's Social Care. Parents will be informed of a referral unless to do so places the child at greater risk.

Class teacher asked to monitor child and feedback to DSL within an agreed timescale

Monitor

DSL makes a written record of the parental meeting and actions decided. May result in monitoring, additional school support or referral to Early Help or CSC.

Refer

DSL discusses decision to refer with Head. (This must not delay the referral process.) If there is any doubt advice will be sought from CSC.

Record

STAGE 3 (reviewed within each 15 days of referral until resolution)

Concerns continue. Decision to continue support or refer to CSC.

Concern resolved

DSL records current outcomes on CPOMS. Decides if further action and/or support is required.

Follows guidance from Children's Social Care

STAGE 4

In all cases the DSL maintains a full chronological record detailing the action taken and the reasoning for those actions. All records are held in the secure area of CPOMS which may only be accessed by the DSL, deputies and the Head.

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 2

DSL and Deputy DSL Responsibilities
The broad areas of responsibility include:

1.   **Raising Awareness**
   - To actively promote a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures
   - To act as a source of support, advice and expertise to staff within the school on all aspects of safeguarding.
   - To be the first point of contact for parents, pupils, staff and external agencies
   - To encourage a culture of listening to children and taking account of their wishes and feelings, amongst all staff, and in any measures the school may put in place to protect them.
   - To ensure that all staff understand their responsibilities to report any concerns
   - To ensure mechanisms are in place to assist staff to understand and discharge their roles and responsibilities with regard to safeguarding and child protection
   - To ensure that all parent volunteers and PTA Reps working in school are aware of the School's Safeguarding Procedures.
   - Be alert to the specific needs of children in need, including those with special educational needs and young carers.
   - To be responsible for overseeing online safety in the school with the support of the school's Online Safety officer and IT manager.
   - To liaise with the Digital Leads to ensure that the filtering of IT equipment undergoes a regular, proactive monitoring regime.
   - To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
   - To ensure the school Safeguarding Policy is available on the School's website.
   - To ensure the School's Safeguarding Policy is reviewed annually, in conjunction with the school's proprietor, or sooner if there is new legislation or guidance, and the procedures and implementation are updated and reviewed regularly.

2.   **Liaison with other agencies**
   - Develop effective links with relevant statutory and voluntary agencies and to be the first point of contact for outside agencies.
   - To decide whether a referral to Children's Social Care is required for a child. (If there is any doubt, advice will always be sought.)
   - To inform the police in cases where a crime may have been committed.
   - To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
   - To ensure that Children's Social Care is informed of any unexplained absence immediately for pupils with active or previous Children's Social Care involvement
   - To report to the local authority 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.
   - To ensure that the Local Authority is informed about any child whose name is added to or deleted from the admission register at a non-standard transition point;
   - To follow up any concerns from staff with regards to poor pupil attendance or regular absences, in line with procedures set out in the Attendance Policy.
   - To liaise with the Head to inform him or her of any issues and ongoing enquiries.

- To follow the School's mandatory duty to report to the Local Authority where it is aware of or suspects that any child is subject to a Private Fostering Arrangement

3. **Training, knowledge & skills**
   - To maintain a regular training programme for all members of the school's staff and volunteers in line with advice from KCSIE and the Local Safeguarding Partners (LSP).
   - To ensure all new staff receive induction training in safeguarding and understand their responsibilities.
   - To receive inter agency training every two years along with annual updates. New information will be shared with staff, Heads, Principals and Vice Principal.
   - To understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
   - To be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
   - To understand the LSCP thresholds and referral processes including Early Help
   - and statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm)
   - To attend and contribute to case conferences and strategy meetings effectively when required.
   - To understand the unique risks associated with online safety and have the relevant knowledge to ensure children are kept safe whilst they are online at school.
   - To obtain access to resources and attend any relevant or refresher training courses.
   - To ensure each staff member has received appropriate training to be refreshed every three years, as well as annual updates, including input on specific topics such as peer-on-peer abuse, child sexual violence and sexual harassment, Prevent
   - To evaluate safeguarding training carried out. This may also be in the form of bitesize chunks or quizzes/surveys.
   - To obtain feedback from staff on the effectiveness of training and school procedures.

4. **Record Keeping & Sharing Information**
   - To keep detailed, accurate and secure written records
   - To ensure safeguarding records are requested from previous nurseries/schools for any new pupils joining the school;
   - To ensure when children leave the school that any child protection records are copied for the new school and transferred within 5 days. To be transferred separately from the main pupil and ensuring confirmation of receipt
   - Understand the importance of information sharing, in accordance with KCSIE guidance, both within the school, and with other schools, safeguarding partners and other organisations and agencies.

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 3

FORMS OF ABUSE AND SAFEGUARDING ISSUES

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (KSCIE, 2021)

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the DSL (or deputy).

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

Any concern whatsoever must be reported to the DSL. In many cases it is not one major incident which triggers a referral but a series of seemingly more minor events. It is therefore highly important that these events are recorded and reported to the DSL immediately.   In addition, a series of smaller events may be reported by a member of staff, which provides the DSL with a wider perspective of the child's situation.

Factors which may make a child particularly vulnerable to abuse include:
- living in a home where there is domestic abuse;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care or who have returned home to their family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

Children with special educational needs and disabilities or physical health issues

Staff are made aware that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and they are more

prone to peer group isolation or bullying. Additional barriers also exist when recognising abuse and neglect in this group of children.   This can include:

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

DEFINITIONS
There are four types of child abuse. They are defined in KCSIE (2021) as follows:

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

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

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.

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.

Affluent neglect
Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be more difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing, particularly in the teenage years. This can lead to increased risks with children who may have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

Further safeguarding issues of which staff should be aware are listed below.
Further detailed information can be found in KCSIE, Annex B.
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

- child abduction and community safety incidents *- see Annex B*
- children missing from education *- see below, also see Thomas's attendance policy*
- children and the court system *- see Annex B*
- child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE) *– see below*
- cybercrime *– see below*
- children with family members in prison *- see Annex B*
- domestic abuse *– see below*
- fabricated or induced illness *– see below*
- homelessness *- see Annex B*
- so-called 'honour based' abuse, including female genital mutilation (FGM) and forced marriage *– see below*
- mental health *– see below*
- modern slavery and the National Referral Mechanism *- see Annex B*
- peer on peer abuse *– see below*
- private fostering *– see below*
- preventing radicalisation, including additional support *– see below*
- sexting (Nudes/semi-nudes) *see section on peer on peer abuse below*
- sexual violence and sexual harassment *see section on peer on peer abuse below*
- teenage relationship abuse *see section on peer on peer abuse below*
- upskirting *see section on sexual harassment below*

Children missing from education
Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. The school ensures that the Local Authority is informed of any unexplained absence immediately for pupils with involvement from Children's Social Care

and reports to the local authority 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. The Local Authority is also informed about any child whose name is added to or deleted from the admission register at a non-standard transition point.

Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE) (including gangs & county lines)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the sexual activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

Child Criminal Exploitation (CSE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Cybercrime (also see Online Safety Policy)
Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the Cyber Choices programme.

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

Domestic Abuse
This is any incident or pattern of incidents of controlling, coercive, threatening behaviour, 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; financial; and emotional. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and long lasting emotional and psychological damage. Staff must be alert to the signs and symptoms of a child suffering or witnessing domestic abuse. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass
When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will usually inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Fabricated Illness
Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.
There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

Further information may be found at https://www.londoncp.co.uk/fab_ind_ill.html

Honour based abuse (HBA)
HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code.

Female Genital Mutilation
Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.
Risk factors for FGM include:
- low level of integration into UK society;
- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE;
- visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

Mandatory Reporting of FGM
The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101. The report should be made immediately. The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

Forced Marriage
A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures.

Peer on Peer Abuse *(also see Behaviour Policy and Anti-bullying Policy)*
Children are also vulnerable to abuse by their peers. Thomas's has a zero- tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". It will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. All children involved whether victim or perpetrator will be treated as "at risk" and supported.

The school recognises the gendered nature of peer on peer abuse and that it is more likely that girls will be victims and boy's perpetrators; however, all peer on peer abuse is unacceptable and must be taken seriously. Staff will always challenge any inappropriate language or behaviour and are aware of developing positive attitudes within pupils, including towards the opposite sex and of promoting and displaying an ethos of mutual respect and equality.

All staff understand, that even if there are no reports in the school it does not mean peer on peer abuse is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding peer on peer abuse they must speak to the DSL or deputy DSL immediately.

Staff receive safeguarding training and anti-bullying training so they are aware of the harm caused by peer on peer abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and Safeguarding procedures as appropriate.

If a child or young person causes harm to another, this will not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. As with other safeguarding decisions, the threshold for dealing with an issue of pupil behaviour or bullying as a safeguarding matter is subject to local guidance and professional judgement. However, it may be appropriate to regard a young person's behaviour as abusive if:
- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
- the perpetrator has repeatedly tried to harm one or more other children;
- there are concerns about the intention of the alleged perpetrator;
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'

Peer on peer abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying):
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment (see below and also see Part five KCSIE and DfE guidance *Sexual violence and sexual harassment between children in schools and colleges);*
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) Also see DfE *Searching Screening and Confiscation Advice* for schools and the UKCIS Education Group *Sharing nudes and semi-nudes: advice for education settings working with children and young people* which outlines how to respond to an incident of nudes and semi-nudes being shared;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission;
- initiation/hazing type violence and rituals.

Any child can be vulnerable to peer-on-peer abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase

a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers as may children with SEND or certain medical conditions.

Sexual violence and sexual harassment by pupils

Thomas's has a zero-tolerance approach to any form of sexual violence and sexual harassment; it is never acceptable and will not be tolerated.

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers. It can also occur online.

Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and that it is more likely to be perpetrated by boys. However, all reports must be treated seriously.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

Staff should follow the processes outlined in paragraphs 7.2 to 7.5 of this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online. (See advice in paragraph 7.5 regarding dealing with reports which involve images and/or the sharing of images.)

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE. This will include:
- initial response - considering the needs of both victim(s) and alleged perpetrator(s);
- record keeping;
- risk assessment;
- consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police;
- ongoing response – safeguarding and support for all parties.

Sexting (youth produced sexual imagery, nudes/semi-nudes)
Sexting is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. The school uses its Computing and PSHE lessons to help pupils to understand and avoid the risks associated with 'online activity'.
Sexting (youth-produced sexual imagery) includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device.

By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is important to consider the facts carefully in each case. Therefore, it is important that the DSL or Deputy DSL is informed immediately of any sexting (youth-produced sexual imagery) incidents. Staff should follow the guidelines in paragraph 7.5 above if images are discovered.

Prejudiced Behaviour
This refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

Preventative Strategies to minimise the risk of Peer on Peer / Child on Child abuse
Preventative strategies for peer on peer abuse are regularly considered by the school. The school also ensures that pupils feel safe to confide and share information about anything that is distressing them and any inappropriate language or behaviour is always challenged by staff. The PSHE curriculum and pastoral care system also gives pupils the opportunity to talk about disputes or difficulties. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including the vulnerability of those who inflict such abuse.

Pupils are made aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. See Point 16 of this policy for details.

A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the usual safeguarding reporting procedures contained in this policy.

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Social Care or the police. The initial assessment will be made by Children's Social Care and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

Any support or sanctions required following a report of peer on peer abuse will be determined on a case by case basis.

The management of pupils with harmful behaviour (including sexually harmful behaviour)

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves
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Children requiring mental health support

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

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention**: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support**: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders. Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behaviour;
- hyperkinetic disorders - disturbance of activity and attention;
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders;

- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect;
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder.

Only appropriately trained professionals can make a diagnosis of a mental health problem. School 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.

If staff have a concern about the mental health of a child they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the *DfE 'Mental Health and Behaviour in Schools'* guidance.

Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

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

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

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

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

Recognising Extremism

Early indicators of radicalisation or extremism may include:
- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment.

Visiting Speakers

Any visiting speakers will be suitably vetted. Visiting speakers will be expected to understand that, where applicable, they 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 time should these be undermined.

Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

SAFEGUARDING AND CHILD PROTECTION POLICY APPENDIX 4

Useful references and organisations

London Safeguarding Children Board   www.londonscb.gov.uk

National Society for the Protection of Children   www.nspcc.org.uk   Tel: 0800 800 500

Child Line   www.childline.org.uk   Tel: 0800 1111

Kidscape   www.kidscape.org.uk

Stonewall   www.stonewall.org.uk

The Safe Network   www.safenetwork.org.uk

Barnado's   www.barnados.org.uk

'Educate against Hate' DfE Website (launched January 2016) educateagainsthate.com

'What to do if you're worried a child is being abused.' Published by DFE (2015)

'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.' Published by the Safer Recruitment Consortium (May 2019)

Everyone's Invited. An organisation based in the United Kingdom, focused on exposing rape culture through "conversation, education and support
https://www.everyonesinvited.uk/

Domestic Violence Website for young people. www.thehideout.org.uk/

Below is a selection of useful teaching resources on domestic abuse/violence for schools

'Is this Love?' Lesson plans and guidance for schools
http://www.devon.gov.uk/adva-education-pack.pdf

Respect Training Resources for primary and secondary schools – developed in Scotland but an excellent resource for use in all schools. www.zerotolerance.org.uk

'Stop Hitting Mum' – Children talk about domestic violence (2003) Mullender A, et al Young Voice.

'Hitting and Hurting – Living in a Violent Family' Pickering, F (2000) The Children's Society.

Children's Perspectives on Domestic Violence, Mullender A, Hague G, and Regan L (2002), Sage.