

**SAFEGUARDING AND CHILD PROTECTION POLICY & PROCEDURES**

This policy is available on the policies page of the School Intranet and policies page of the School website.

<b>Member of Staff Responsible</b>	<b>Head of Lower School</b>
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**If you are worried about a child go to page 22**

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## **Safeguarding and Child Protection Policy**

### **I Introduction**

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

The core safeguarding principles of Rokeby School, hereafter referred to as the 'School', are:

- It is the responsibility of the School to safeguard and promote the welfare of children.
- Children who are and feel safe make more successful learners.

Representatives of the school community of parents, staff and governors will be involved in policy development and review. The Safeguarding and Child Protection Policy will be reviewed annually by the Governing Body, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy (which includes all sections and all of the appendices in this document) is one of a series in the School's safeguarding portfolio. This policy has been authorised by the Board of Governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with children even where this is away from the School, for example at an activity centre or on an educational visit. This policy applies to all pupils at this school including those in Foundation Stage.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education (Independent School Standards) (England) Regulations 2014; and in line with government publications: Working Together to Safeguard Children 2023, Keeping Children Safe in Education (2024) (KCSIE) and the Kingston and Richmond Safeguarding Children Partnership procedures. Any deficiencies or weaknesses in the child protection arrangements will be remedied without delay.

This policy takes into account the school's local distinctiveness and contextual information.

In this policy, 'DSL' refers to the 'Designated Safeguarding Lead' also known as the 'Safeguarding Lead'.

### **2 Policy Statement, Principles and Aims**

#### **2.1 Policy Statement**

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow

our procedures to ensure that children receive effective support, protection and justice. Our school understands that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. We are aware, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, sexual orientation or language barrier. This does not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

## 2.2 Principles

- The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and children feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary.
- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities.
- 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, and know how to approach adults if they are in difficulties.
- All staff, including the Headmaster are responsible for safeguarding the welfare of children as part of their professional duties.
- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of significant harm; the full version of KCSIE is available to all staff via the staff shared area.
- A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.
- The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Staff Recruitment Policy; where staff from another organisation are working with children on another site, the School will have received written confirmation that appropriate child protection checks and procedures have been carried out on those staff.
- All children and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.
- The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those boys who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with Children's Social Care (CSC), the police, health and other services to promote the welfare of children and to protect them from harm. In situations where a child is not at risk of suffering significant harm but is instead in need of additional support from one or more agencies (referred to as a child 'in need'), the School will work alongside external agencies to ensure that the child gains appropriate multi-agency services.
- Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the School will comply with any request to supply information to Kingston and Richmond Safeguarding Children Partnership with any information that it requires in order for it to perform its functions.
- This policy should be read in conjunction with the following policies,

- The Code of Conduct, Anti-Bullying, Policy, ICT Policy (staff and pupil), First Aid, Missing Child Procedure, Data Protection policies, SEN Policy, Whistleblowing Policy, Equals Opportunities Policy – pupils, EDI - staff , Prevent Policy and Low-Level Concerns Policy

## 2.3 Aims

- To provide all staff, including the DSL, the Headmaster, volunteers and Governors with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the school.
- To demonstrate the School's commitment with regard to safeguarding children.

## 3 Context

Section 87(1) of the Children Act 1989, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 require the proprietors of the School (The Governing Body) to have arrangements – which must have regard to any guidance issued by the Secretary of State - to safeguard and promote the welfare of children at the school. The latest statutory guidance and Government advice for practitioners covering this policy is contained in the documents Keeping Children Safe in Education (KCSIE) (2024), 'What to do if you're worried a child is being abused' (March 2015), Working Together to Safeguard Children (2023), Information Sharing (July 2018), Revised Prevent duty guidance: for England and Wales (April 2021), The Prevent duty (June 2015), Disqualification under the Childcare Act 2006 (August 2018) and The Use of Social Media for On-line Radicalisation (July 2015). The Kingston and Richmond Safeguarding Children Partnership also publish guidance and information for schools in our area. We are aware of the DfE advice and information contained in the documents Mental Health and Behaviour in Schools (November 2018) and Counselling in Schools: a blueprint for the future (February 2016).

The School and its staff form part of the wider safeguarding system for children. This system is described in Working Together to Safeguard Children 2023. The School works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

The School has a Designated Safeguarding Lead (DSL) (and nominated deputies), who are named in section 4 below. Their responsibilities are outlined in section 5.

## 4 Key Personnel and Contact Details

- 4.1 The DSL at Rokeby is Lucia Sanderson (Head of Lower School) - [l.sanderson@rokeby.org.uk](mailto:l.sanderson@rokeby.org.uk) 07747 896558

The School's Prevent Lead is Lucia Sanderson - [l.sanderson@rokeby.org.uk](mailto:l.sanderson@rokeby.org.uk) 07747 896558

The Deputy DSLs are:

- Kerry Bratt (Deputy Head - Pastoral) – [k.bratt@rokeby.org.uk](mailto:k.bratt@rokeby.org.uk), 07932 662965
- Tom Taylor (Head of Middle School) – [t.taylor@rokeby.org.uk](mailto:t.taylor@rokeby.org.uk), 07791 221186
- Victoria Hayward (Head of Reception) - [v.hayward@rokeby.org.uk](mailto:v.hayward@rokeby.org.uk), 07970 773586

- Fleur Tattersall (Senior Teacher - Pastoral) - [f.tattersall@rokeby.org.uk](mailto:f.tattersall@rokeby.org.uk), 07866 525162

The Safeguarding Lead for Foundation Stage is Victoria Hayward - [v.hayward@rokeby.org.uk](mailto:v.hayward@rokeby.org.uk), 07970 773586

The Headmaster of Rokeby is Jason Peck - [j.peck@rokeby.org.uk](mailto:j.peck@rokeby.org.uk), 07557 271989

#### **4.2 Child Protection Governor for the School**

The nominated Child Protection Governor and Prevent Governor for the School is James Kelly – 07782 645694

#### **4.3 Chair of Governors for the School**

The Chair of Governors for the School is Deirdre Davidson - 07773 312942

#### **4.4 Vice Chair of Governors for the School**

The Vice Chair of Governors for the School is Sebastian Henkes – 07710 160180

### **5 Roles and responsibilities in Managing Safeguarding & Child Protection**

#### **5.1 All Staff**

All staff, which includes the Headmaster, all Governors, teaching and support staff, including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff') have a statutory responsibility to:

- Have read at least part one of the most updated version of Keeping Children Safe in Education and Annex B where applicable and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- All staff will complete an annual Keeping Children Safe in Education assessment.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.
- Provide a safe environment in which children can learn.
- Be trained and be aware of systems, policies and procedures within the School which support safeguarding, including online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Be aware of the signs of abuse, neglect, exploitation and radicalisation so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, working with other services as needed;
- Work with the DSLs and, if required, to support social workers to take decisions about individual children;
- Attend appropriate safeguarding and child protection training on appointment and subsequent refresher training in accordance with Kingston and Richmond Safeguarding Children Partnership; and
- Make a direct referral to CSC immediately if, at any point, there is a risk of immediate serious harm.

## 5.2 Designated Safeguarding Leads

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The broad areas of responsibility for the DSL (and DDSL) are as follows and taken from Annex C of KCSIE:

### ***Managing referrals***

- Refer all cases of suspected abuse to the local authority Children's Social Care (dependent upon where the child lives, this will be Kingston, Merton, Wandsworth, Sutton or another authority) and:
- If an allegation is made against a member of staff the headteacher/DSL will discuss the content of the allegation with the LADO within 24 hours before taking any further action.
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or police (cases where a crime may have been committed) or Channel programme as necessary. (See National Police Chief's Council (NPPC) 'When To Call The Police' guidance document for schools and colleges.)
- Liaise with the Headmaster to inform him of safeguarding issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice, training and expertise to staff on matters of safety, online safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- And all other duties as outlined in KCSIE 2024.

### ***Training requirements: DSL and DDSLs***

- Rokeby School demonstrates their engagement with the KRSCP by ensuring that it's DSL and/or deputies attends the KRSCP Designated Safeguarding Lead termly forums. The DSL and DDSLs keep abreast of child protection learning and developments through appropriate training, as well as complete Multi Agency Level 3 safeguarding training.

The DSLs and DDSLs will receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular how Kingston and Richmond Safeguarding Children Partnership conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures and the Code of Conduct, especially new and part time staff;
- Be alert to and support the specific needs of children in need, those with special educational needs and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Obtain access to resources and attend any relevant or refresher training courses; and



- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

### **Raising Awareness**

The DSL will ensure the School's policies are known and used appropriately. She will:

- Ensure the School's Safeguarding and Child Protection Policy (and Code of Conduct) is reviewed and updated annually and whenever needed, so that it is kept up to date with safeguarding issues as they develop, including lessons learnt. The DSL will also ensure that procedures and implementation are updated and reviewed regularly, in light of changes in local procedures and national statutory requirements and guidance, and work with the Governing Body regarding this;
- Ensure the Safeguarding and Child Protection Policy is available publicly (through the School website) and parents are aware of the fact that referrals about suspected abuse, neglect or radicalisation must be made and the role of the School in this;
- Link with the Kingston and Richmond Safeguarding Children Partnership, to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the school, ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives. This should be transferred separately from the main pupil file. Information should be shared proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the DSL and SENCO, are aware of any needs.

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Ensure that all staff have received the required training which should include online safety and they have signed to indicate that they have read and understood this policy and the Code of Conduct (which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with children) Part One of KCSIE and that they know who the DSL is.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children are experiencing or have experienced with staff at school, in order to support these children.
- Ensure that all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- Ensure that all staff are trained with regard to all pertinent aspects of the Prevent Duty and that they are aware of school referral procedures regarding this area – see the school's separate Prevent Policy.
- Notify CSC if a child with a child protection plan is absent for more than two days without explanation.
- Ensure the DSL attends appropriate higher level training to support the Prevent strategy and is able to provide advice and support to other members of staff on protecting children from radicalisation.
- Uphold a close relationship with the KRSCP, such as through attendance KRSCP termly DSL forums.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT) (see Policy for Boys), Personal, Social and Health Education (PSHEE), Relationships Education and/or Relationships and Sex Education (see Relationships Education & Relationships and Sex Education Policy).

- Ensure appropriate safeguarding responses are in place and are implemented to deal with children who are absent from education, particularly repeatedly, as outlined in the Attendance policy. Procedures in the event of a missing boy are covered in the Crisis Management Plan; and Children Missing Education policy.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with the Headmaster to inform him of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an appropriate adult. Further information can be found in the statutory guidance – PACE Code C 2019. The DSL is responsible for ensuring all staff are aware of this requirement.

### 5.3 DDSLs

The DDSLs have also undertaken Level 3 child protection training and training in inter-agency working and will attend refresher training every two years. In the absence of the DSL, the functions of the DSL will be carried out by a DDSL. In this policy, reference to the DSL includes a DDSL where the DSL is unavailable.

### 5.4 Governing Body ('GB')

It is the GB's overall responsibility to ensure compliance with child protection statutory requirements. The GB takes seriously its responsibility to uphold the aims of the Rokeby Educational Trust Limited charity and its duty of care in promoting the welfare of children, ensuring their security, and protecting them from harm. The reporting of safeguarding practice at the school enables the GB to ensure compliance with current legislation and to identify areas for improvement. The GB recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

All governors will read Keeping Children Safe in Education in its entirety.

The GB will ensure that:

- There is an effective and statutorily compliant child protection policy and procedures in place, together with a staff Code of Conduct, and that these are provided to all staff (including temporary staff and volunteers) on induction.
- DSLs are appointed and that they have the appropriate authority and the time, funding, training, resources, and support to fulfil the role and responsibilities as outlined above.
- They have approved the DSL's job description and make sure:
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- The School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children 2023 through effective implementation of the child protection policy and procedures and good cooperation with local agencies.
- The School's safeguarding operating procedures take into account the procedures and practice of the local authority as part of the multi-agency safeguarding arrangements set up by the Kingston and Richmond Safeguarding Children Partnership.

A member of the Governing Body is nominated by the full Governing Body to:

- Have oversight of child protection matters.
- Liaise with the local authority and/or partner agencies on issues of child protection.
- Instigate the annual review of this policy and safeguarding procedures – The Annual Safeguarding Audit.
- Ensure that children are taught about safeguarding, including areas such as the risk of radicalisation (as appropriate), internet safety and the importance of disclosing any abusive treatment.

The GB will ensure that:

- The school has statutorily compliant procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headmaster (see part four of KCSIE 2024 and Appendix 2 of this document);
- The school also has procedures in place to handle allegations against other children;
- The school operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance (see part three of KCSIE 2024 and the School's Staff Recruitment policy);
- The school operates an effective training strategy that ensures all staff, including the Headmaster, receive child protection training, including online safety, with refresher training at appropriate intervals in accordance with Kingston and Richmond Safeguarding Children Partnership guidance;
- The DSL and deputies receive refresher training annually.;
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governing Body meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding. This review takes the form of a detailed audit document which is then reported on to the GB. This process also includes a requirement for the Governor in charge to check that the policy is known in practice and as such he/she interviews several members of staff;
- Where necessary, an appropriately trained and informed teacher will be nominated who has the skills, knowledge and understanding necessary to keep safe children who are looked after by a Local Authority;
- All members of the Governing Board receive safeguarding training at induction which is regularly updated (3 yearly). The designated safeguarding governor attends appropriate

training that guides governors in their strategic responsibilities to provide appropriate challenge and support for any action and to progress areas of weakness or development in the school's safeguarding arrangements.

- Appropriate safeguarding responses are in place to deal with children who go missing from the School (see missing boy procedure in CMP), in particular any children who go missing on repeat occasions; and
- Any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation is reported to the Charity Commission immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries. In particular, if:
  - There has been an incident where the beneficiaries have been or are being abused or mistreated while under the care of the School or by someone connected with the School such as a Governor, member of staff or volunteer;
  - There has been an incident where someone has been abused or mistreated and this is connected with the activities of the School; or
  - Allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place there are grounds to suspect that such an incident may have occurred;

For guidance from the Charity Commission on 'How to report a serious incident in your charity' [click here](#).

## **5.5 The Headmaster**

The Headmaster will:

- Ensure that the safeguarding and child protection policy and procedures adopted by the GB are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children is dealt with in accordance with the school's Whistle Blowing procedures (see Code of Conduct);
- Ensure that children's safety and welfare is addressed through the curriculum;
- Receive the required child protection training and training in order to understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers.
- Ensure that online safety training is included in staff safeguarding and child protection training.
- Ensuring the relevant staffing ratios are met, where applicable.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

## **6 Safer Recruitment**

The School is committed to safer recruitment and for implementing these practices. See the School's Staff Recruitment Policy for further details.

## **7 Good Practice Guidelines**

To meet and maintain our responsibilities towards children, all members of the School community (Governors, staff as defined in 5.1 above, children and parents as appropriate) are expected to adhere to the following standards of good practice:

- Reading and understanding all of the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Code of Conduct, Anti-Bullying, Policy, ICT Policy (staff and pupil), First Aid, Missing Child Procedure, Data Protection policies, SEN Policy, Whistleblowing Policy, Equals Opportunities Policy – pupils, Equals Opportunities Policy – staff, Prevent Policy, and Low-Level Concerns Policy.
- SLT are expected to read KCSIE in its entirety.
- Treating all children with respect;
- Setting a good example by conducting ourselves appropriately;
- Involving children in decision-making which affects them;
- Encouraging positive and safe behaviour among children;
- Being a good listener;
- Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language; and
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse. Staff need to carefully consider how they are supporting pupils with regards to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race.

## **8 Abuse of Trust and Inappropriate Relationships**

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The School's Code of Conduct, separately sets out expectations of staff.

All staff are aware of the potential for a child's relationship with another child to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in Child-On-Child Abuse section of this policy.

## **9 Children who may be particularly vulnerable**

Some children may be at increased risk of significant harm as a result of neglect and/or physical, sexual or emotional abuse. See Appendix I for details about the types and signs of abuse.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

- Disabled or have special educational needs
- Living in an identified domestic abuse situation
- Affected by known parental substance misuse
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic, neglectful and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of their sex, race, ethnicity, religion, gender reassignment or sexual orientation (protected characteristics)
- Do not have English as a first language
- 'Looked After' Children (LACs) or children in 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.

Special consideration and attention includes monitoring through the pastoral systems of the School:

- The Form Tutors, Year Heads and fortnightly Year Group Meetings, Bullying Record and Child Protection file.
- The Form Tutors, Year Heads, Deputy Head and Head of Lower/Middle School monitor the welfare of children who may be particularly vulnerable. There is regular liaison with the DSL and the file for the individual child is updated on My Concern as new information arises.
- Input and support through ELSA (Emotional Literacy Support Assistants)
- The DSL liaises with CSC regarding involvement of outside support agencies.

It may also include, as necessary, the appointment of an appropriately informed teacher to promote the educational achievement of any child who is 'looked after' or who is otherwise considered in need of such support. Where a member of staff is placed in a position of working with a 'looked after' child, they will be provided with all necessary information, including: the child's status, up-to-date assessment information from the relevant Local Authority, the most recent care plan, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

### **Mental Health**

Schools play a vital role in detecting mental health problems and supporting good mental wellbeing. Mental health difficulties can lead to broader safeguarding concerns and can be an indicator of abuse, neglect or exploitation. Staff should be well placed to identify mental health problems. If they do have a mental health concern about a pupil it is also a safeguarding concern and they must follow the procedures in this policy and inform the DSL. The Pastoral Care and Welfare Policy Part 2 sets out how the school manages mental health concerns.

## 10 Complaints or concerns about staff

The School's complaints procedure will be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. The complaints procedure is available to all parents and staff via the School Policies page of the school's website.

Complaints from staff involving wrongdoing in the workplace that does not involve the safeguarding and welfare of children are dealt with under the school's Whistleblowing, Disciplinary and Grievance procedures. The School's staff procedures are available via the Staff Handbook.

The procedure in Appendix 2 will apply if there is an allegation that a teacher or other member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children. This includes behaviour such as perpetrating domestic abuse which could pose a transferable risk to children in the school setting (KCSIE 2024).

If the allegation is made against a supply teacher, contractor or other person not directly employed by the School, the organisation or agency of employment will be informed and fully involved in addition to following the procedures in this policy.

Allegations against former members of staff or volunteers who are no longer working at the School, or concerns or suspicions about applicants for positions at the School should be referred to the Headmaster, who will refer them to the LADO SERVICE, or in an emergency or in cases of serious harm, directly to the police.

**A concern (including an allegation) that does not meet the harm threshold** – i.e. a low-level concern about another member of staff or volunteer also needs to be raised promptly to the Headmaster. The term 'low-level concern' does not mean that it is insignificant; it means that an adult's behaviour towards a child does not meet the harm threshold set out above.

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 may have acted in a way that:

- is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO SERVICE– but may merit consulting with and seeking advice from the LADO, on a no-names basis if necessary.

The school's Low-Level Concerns Policy provides detailed guidance on staff responsibility for raising such concerns and how concerns are managed.

## 11 Training

It is important that all staff (as defined in 5.1 above) have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

New staff will receive training and copies of key policies on appointment as part of their induction, overseen by the DSL, that includes:

- This policy and the Prevent Duty Policy
- The identity of the DSL and DDSLs
- A copy of Part One of KCSIE and Annex B where applicable
- Behaviour, Conduct and Discipline Policy
- Anti-Bullying Policy
- Children Missing Education Policy
- The staff Code of Conduct
- Whistleblowing Policy
- Low-Level Concerns Policy
- ICT Policy – Staff
- ICT Policy – Pupils

All staff will be required to sign to confirm they have read, understood, and agreed to comply with the requirements outlined in these documents.

Staff who do not have direct contact with children should be directed to read Annex A only as this is considered a sufficient and concise version of KCSIE.

All staff will receive Level 2 child protection training every 3 years and complete an annual safeguarding refresher. Such training, when arranged, takes priority over all other commitments.

All staff will be trained to:

- Understand online safety
- Be aware of their role in the Early Help process
- Understand the process for making referrals to Children's Social Care
- Know what to do if a pupil tells them he is being abused, exploited or neglected
- Reassure victims that they are being taken seriously and that they will be supported and kept safe

There will also be informal termly safeguarding updates for staff.

The Governing Body is encouraged to take part in Safeguarding training.

All staff will receive appropriate Prevent awareness training in the form of the on-line general awareness training module [Home Office Prevent eLearning](#) or other appropriate training package. Prevent training will be in line with the recommendations set out by Kingston and Richmond Safeguarding Children Partnership and the school will follow the local guidelines/updates in this area. The additional support provided by the DfE in relation to the Prevent Duty, noted in Appendix B of KCSIE, will be accessed if needed. See the separate Prevent Duty Policy for more information on how the school fulfils its duty to prevent its pupils from being radicalised.

The DSLs and DDSLs will receive training updated at least every two years, including training in inter-agency working, participation in child protection case conferences, supporting children in need, Prevent, record keeping, promoting a culture of listening to children and safer recruitment (see also 5.2 above), plus informal updates. Such training, when arranged, takes priority over all other commitments.



A register will be taken of attendees at each training seminar and training dates (and dates for future refresher training) to be logged by the HR Administrator and retained on safeguarding training records.

All training will be carried out in accordance with the Kingston and Richmond Safeguarding Children Partnership procedures and requirements.

All staff should feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children is dealt with in accordance with the School's Low Level concerns and whistleblowing procedures.

## **12 Health & Safety, Extended School Activities and Educational Visits**

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

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

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

## **13 Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children, we will:

- Give parents the opportunity to opt out of photographs to be taken or published (for example, on our website or in newspapers or publications)
- Use only a child's first name with an image when photographs of children are published on the website or via social media, unless parents have consented for the child's full name to appear next to the image
- Ensure that children are appropriately dressed

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 are accompanied at all times whilst on site.

Photographs, digital images or videos of boys may be taken by parents and family members, either on the school site or when children are involved in organised activities off site. Parents

and family members are welcome to take photographs or videos of school events which may include images of other children. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet. Parents should not take photographs of their son or other children in the swimming pool or changing rooms. If the behaviour of an adult capturing images seems unusual or the child 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.

Staff and pupils are forbidden to use their own personal mobile devices to take images of children at school or on trips. See separate Staff Code of Conduct for details.

#### **14 Pastoral and Safeguarding Education**

The school promotes the welfare of children through the assembly programme, PSHEE curriculum, the ICT curriculum, school website and parents' forums. Children are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm. Children are taught about radicalisation and how to empower themselves and be resilient in year 7 and 8 PSHEE lessons. Children are also taught strategies regarding keeping safe online via PSHEE, ICT lessons and visits from Childnet. Road safety is also taught through the PSHEE curriculum. Year 6 are visited by a member of TfL regarding independent travel on public transport. We use the resources sent by the NSPCC to educate the children with regard to their right to be happy and safe and to teach them an awareness of how to get help and sources of help, including ChildLine.

Relationships Education and Relationships and Sex Education are taught in PSHEE and Science and satisfy the statutory recommendations in this curriculum area as stated in 'Relationships and sex education (RSE) and health education 2019 (updated in 2020 and 2021)'. See the School's separate Relationships Education & Relationships and Sex Education Policy.

#### **15 Bullying**

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other means using technology). The School is determined that no kind of bullying will be tolerated by the children, parents or staff at the School. For full details, see the school's Anti-Bullying Policy which can be found on the school website and will be followed in the case of alleged bullying. If there is a concern that a child is at risk of serious harm from bullying behaviour, the School's Child Protection Procedures will be followed; the police will be informed in cases of serious harm.

#### **16 E-Safety**

Our children will use mobile devices and computers at various times. They are important tools for communication and education as well as for recreation and socialising. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. We know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in radicalisation-based activities, sexually harmful conversations, webcam photography or face-to-face meetings.

The school helps its pupils to stay safe online by having robust processes (including filtering and monitoring) in place and educating them about content, contact, conduct and commerce ('the four Cs'). The children receive guidance on safe use of the internet (including anti-bullying and radicalisation) through the ICT and PSHEE curriculum and, occasionally, through assemblies.

The school recognises that many children have unlimited and unrestricted access to the internet via mobile phone networks personal phones, which could be used to sexually harass peers, share indecent images, and view and share illegal, inappropriate or harmful content. The school manages this risk by:

- i) only allowing older boys to bring in phones if they partake in independent travel and
- ii) enforcing the rule that all boys must hand in their personal phones to the office during the school day. See the School's Student Mobile Phone Policy, which makes clear the acceptable use of mobile phones by children during the school day.

Cyber-bullying by children, via texts, 'sexting' (youth produced sexual imagery), direct messages, social media, or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Policy and procedures. See also the School's ICT Policy for Boys.

Chat rooms and social networking sites can be sources of risk of inappropriate and harmful interaction in the digital arena. Some boys will undoubtedly be 'chatting' on mobile or social networking sites at home. The school runs boys and parents seminars to help them understand the possible risks and advise on what to do if concerned.

The school also educates boys on cyber-security to make them less vulnerable to commerce risks online, such as phishing and financial scams.

The school's Code of Conduct and ICT Policy – Staff, explain the responsibilities of staff in relation to keeping children safe in school.

## **17 Secure premises**

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

Visitors' book: The School keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are handed over to the person responsible for their visit. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the school premises. The reverse of the badge contains relevant safeguarding information for visitors and fire procedure information.

The school will ensure that any visiting speakers invited by staff or by the pupils are suitable and appropriately supervised. Speakers should not be left alone with pupils and the school will take suitable action to ensure that they are appropriate for the audience e.g. references will be obtained.

## **18 Monitoring and review**

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Governors. Where an incident

involves a member of staff, the LADO SERVICE will assist in this review to determine whether any improvements can be made to the school's procedures.

In addition, the DSL will ensure that this policy is reviewed annually, and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

The Governors will undertake an annual review of this policy and its procedures including good cooperation with local agencies and of the efficiency with which the relevant duties have been discharged. The annual review and any changes to the policy will be signed off by the GB at a full meeting, where the review will be discussed, and minutes will be taken.

## Child Protection Procedures

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the **early signs** of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction. **Early help** is imperative and in our school, this means discussing concerns with the DSL in order for a child to access help at an early stage.

### 1 Recognising abuse

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSIE 2024 and reproduced in Appendix 1.

Any safeguarding **concern** (however minor) should be discussed with the DSL as soon as it arises. The DSL will decide on the course of action to be taken. If the child is deemed to be in **immediate danger**, the actions laid out in section 3 – page 22 will commence.

There can be additional barriers when recognising abuse and neglect of children with SEND. These barriers include:

- Assuming that indicators of possible abuse such as behaviour, mood and injury are due to the child's condition
- SEND children being more vulnerable to bullying and being isolated by their peers
- SEND pupils being disproportionately affected by behaviours such as bullying without showing any outward signs
- Communication difficulties in managing and reporting these challenges

### 2 Specific safeguarding issues

All staff, but especially the DSL (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example, the NSPCC offers information for schools on the TES

website and also at [NSPCC information](#). Staff can also access broad government guidance on the issues listed below via the GOV.UK website:

child sexual exploitation (CSE)	gangs and youth violence
bullying including cyberbullying	trafficking
domestic violence	mental health
drugs	private fostering
fabricated or induced illness	radicalisation
faith abuse	sexting
forced marriage	female genital mutilation (FGM)

### 3 What to do if you suspect a child is at risk of significant harm

If a member of staff is concerned that a child may be suffering significant harm or is at risk of significant and immediate danger, the matter should be referred to the DSL, or deputy in the DSL's absence, as soon as possible. If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns and pass it to the DSL immediately in person and follow up in writing via My Concern. If the child does begin to reveal that they are being harmed or is at risk of significant harm you should follow the advice in section 4 below: 'If a child discloses information to you'.

### 4 If a child discloses information to you

A child may disclose safeguarding information directly to a staff member or via a pastoral system, e.g. a worry box or the SOS box, a trusted adult

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

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – **you are not allowed to keep secrets or promise confidentiality**. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the

very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

In the event of a child disclosing child-on-child abuse, the advice for staff is the same as that stated here with the following additional advice: in the event of an inappropriate or illegal image of a child being presented, staff should avoid viewing it beyond what is immediately necessary and should not forward such images onto others.

During your conversation with the child:

- Allow them to speak freely.
- Listen carefully, be patient and focus on what you are being told.
- Remain calm, try not to express your own views and do not over-react – the child may stop talking if they feel they are upsetting or shocking you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Say you will take them seriously.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- 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.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- 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.
- Follow the procedure outlined in section 5 below, Taking action: advice for staff
- Write up your conversation as soon as possible and hand it to the DSL. Add to My Concern within 24 hours.
- Seek support if you feel distressed.

## **5 Taking action: advice for staff**

Key points to remember for taking action are:

- act immediately if you need to report or respond to a concern;
- in an emergency take the action necessary to help the child, for example, call 999;
- report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 2 should be followed;
- if the DSL is not available, ensure the information is shared with the deputy DSL (or in their absence, with the most senior person in the school) that day. If there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to children's social care immediately. See section 6 below;
- do not start your own investigation;

- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- ensure the DSL receives your concerns in writing as soon as possible;
- ensure all concerns are recorded on My Concern.
- seek support for yourself if you are distressed.
- Staff will consider the impact of any siblings as well as the support they will need.

## **6 Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined above. However, they may also share information directly with CSC, police or the NSPCC if: the situation is an emergency and the DSL, their deputy, the Headmaster or the chair of governors are all unavailable or if they are convinced that a direct report is the only way to ensure the child's safety.

If, at any point, there is a risk of immediate serious harm to a child, and you are unable to share the information with the DSL or a deputy DSL or the most senior person in the School you can find to help you, a referral should be made to CSC immediately. Anybody can make a referral.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the Single Point of Access team at Kingston in the first instance for advice on how to refer (you may be referred to another Local Authority SPA team): 020 8547 5008 (020 8770 5000 for out of hours / weekends).

The SPA team will require basic information from you such as:

- Your name
- Address
- Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

Other ways to report your concerns:

- NSPCC helpline – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence, or text anonymously to 88858.
- The NSPCC Whistleblowing helpline is 0800 028 0285. It offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

Any direct reporting must be recorded on My Concern.

## **7 Notifying parents**

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion of radicalisation or disclosure. All communication with parents must be recorded on My Concern.

However, if the school believes that there are reasonable grounds to believe that a child is at risk of significant harm or that notifying parents could increase the risk to the child or exacerbate



the problem, then advice will first be sought from CSC (Children's Social Care). It is legitimate to share concerns without consent when there is a good reason to do so and sharing the information will enhance the safeguarding of the child in a timely manner. This is also subject to advice from the LADO SERVICE (Local Authority Designated Officer) if the allegation involves a member of staff.

For the avoidance of doubt, referrals to CSC and other statutory agencies do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

## **8 Action by the DSL – referral to CSC**

It is possible that some concerns raised with the DSL will not require a referral; instead pastoral support or Early Help could be appropriate. However, the DSL (or in their absence, a DDSL) will make a referral to CSC immediately if it is believed that a child has suffered or is at risk of suffering significant harm.

In situations where a child is not at risk of suffering significant harm but is instead in need of additional support from one or more agencies (referred to as a 'child in need'), the DSL will still liaise with CSC in accordance with local inter-agency procedures and, depending on their advice, will complete a Common Assessment Framework (CAF) form or engage with any other approach offered by CSC (e.g. 'Team around the Child') to ensure assessment/referral of the child and/or his parents for appropriate social care services.

Many School children are resident in other boroughs; in these cases a CAF form or details of other local approaches (e.g. 'Team around the Child') will be obtained by contacting local children's services team for the borough of residence.

If there is room for doubt as to whether a referral should be made, the DSL will consult with CSC on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to CSC will be made without delay.

In the case of pupils identified as being at risk of radicalisation the school will consider the level of risk to identify the most appropriate referral, which could include Channel or CSC.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the CSC within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the CSC again.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in Appendix 2.

If the child/young person does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.

Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged instigator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the person affected by the behaviour's wishes against their duty to protect them and other children. All decision making will be recorded on My Concern.

## 9 Children with harmful behaviour – Child-On-Child Abuse Procedures

Children may be harmed by other children or young people – **'child-on-child abuse'**

Rokeby School (hereafter referred to as 'the School') recognises that children are vulnerable to being abused by other children and to abusing other children. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal, physical and digital abuse. All child-on-child abuse is unacceptable. Child-on-child abuse will not be tolerated or passed off as part of "banter," "having a laugh," "part of growing up" or "boys being boys."

We are committed to a whole school approach to ensure the prevention, early identification and appropriate management of child-on-child abuse within our school and beyond.

In cases where child-on-child abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

- Child-on-child 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 children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Some of these behaviours will need to be handled with reference to other policies in the School such as the:

- Behaviour, Conduct and Discipline Policy
- Anti-Bullying Policy
- ICT Acceptable Use Policy for Boys

The next section has greater focus on child-on-child abuse in the context of sexual harassment and sexual violence to reflect increased Government guidance in this area ((eg Sexual violence and sexual harassment between children in schools and colleges (2021)); however, this policy covers all forms of non-sexual abuse too. It is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2024) and should be read in conjunction with the Kingston and Richmond Safeguarding Children Partnership's policy and procedures, and any relevant practice guidance issued by it. It also follows the guidance provided in When to Call the Police – Guidance for Schools and Colleges and Sexual violence and sexual harassment between children in schools and colleges (2021).

### **Understanding Child-On-Child Abuse**

Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.

Sexual harassment and sexual violence may occur online and offline.

### **The Context**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

We recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour 'HSB').

We are adopting the NSPCC definition of HSB as, "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

We will also use Simon Hackett's continuum model to understand the range of sexual behaviours and, consequently, help the School decide an appropriate response if HSB occurs or is alleged. Aspects of the continuum can also be used to assess where other alleged behaviour, such as physical or emotional abuse, falls on the spectrum and help the School decide how to respond.

### **Vulnerable Groups**

We recognise that all children can be at risk; however, we acknowledge that some groups are more vulnerable. This can include: experience of abuse within their family; living with domestic violence; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); and children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010. In addition, we acknowledge that children who have allegedly abused other children or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents or adults in the community.

Whilst research tells us girls are more frequently identified as being abused by other children (and boys are more likely to be perpetrators), we know that such abuse is not confined to

girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Research also shows that boys report high levels of victimisation in areas where they are affected by gangs.

All staff should be aware of the indicators of serious violent crime. These include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### **Responding to Concerns and Alleged Incidents**

All allegations of child-on-child abuse must be taken seriously. Staff should follow the Child Protection Procedures if they have a concern regarding child-on-child abuse or if an allegation of such abuse is made to them. The procedures tell staff what to do to fulfil their responsibilities to identify, act on and refer the early signs of abuse. These procedures enable children to confidently report abuse, knowing their concerns will be treated seriously.

All staff must report any concerns to the Designated Safeguarding Lead and challenge abusive behaviours between pupils.

Reports of such abuse will be recorded and investigated in line with the school's Anti-Bullying Policy and Behaviour, Conduct and Discipline Policy. A thorough investigation into the matter will be conducted and appropriate support will be put in place for involved pupils, as required. The school understands that even if cases of child-on-child abuse are not reported, such abuse may still be happening. Therefore, staff will be vigilant for the signs of abuse and the school will make efforts to minimise the risk of child-on-child abuse.

In addition to following these procedures there are certain other considerations and actions the School will take when responding to specific types of child-on-child abuse incidents. These are outlined below.

### ***Sexual violence and/or sexual harassment incidents***

Following an incident, we will consider:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children, adult students or staff; and other related issues and wider context?
- Guidance provided in *When to Call the Police – Guidance for Schools and Colleges*

In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally through utilising the School's Behaviour, Conduct and Discipline Policy and/or the Anti-Bullying Policy and by providing pastoral support.

We may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to Children's Social Care (CSC) following locally agreed protocols. The School will take advice from CSC on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all children involved including the child or children accused of abuse.

Any report to the police will generally be in parallel with a referral to CSC. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (including potential witnesses). Where required, advice from the police will be sought in order to help us and ensure any actions the School takes do not jeopardise the police investigation.

If a child is convicted or receives a caution for a sexual offence, the School will update its risk assessment and ensure relevant protections are in place for all children.

Where cases are classified as "no further action" by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the child who has allegedly been abused and the child who has allegedly carried out the abuse for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the child who has allegedly been abused. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

Regardless of whether a case is managed internally or referred to an external agency, the school will consider any suitable action through reference to our Behaviour, Conduct and Discipline policy. A child (or children) against whom an allegation of abuse has been made may be suspended from the School during the investigation. For any child displaying regular violent behaviour, the school should draw up individual action and support plans in order to reduce the necessity for the use of 'reasonable force'. The circumstances when a staff member may use such force are set out in the School's Code of Conduct and follows Government guidance set out in Use of Reasonable Force (2013).

All staff will be trained to manage a report of child-on-child sexual violence or sexual harassment.

### ***Physical abuse***

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

Physical abuse can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the Anti-Bullying Policy will be applied in these cases, with recognition that any police investigation will need to take priority.

### ***Online behaviour***

Many forms of child-on-child abuse have an element of online behaviour, including behaviours such as cyberbullying and sexting.

Policies and procedures concerning this type of behaviour can be found in the School's ICT Acceptable Use Policy for Boys, the Code of Conduct and Anti-Bullying Policy.

Where an incident includes an online element the School will seek advice on searching, screening and confiscation.

If indecent images and/or videos of children are discovered at school, staff will follow procedures set out in the School's Code of Conduct. In particular, an immediate referral should be made to the DSL and the police contacted. The images/equipment/device should be confiscated, secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. The police will advise what to do with the images. If the images are of children known to the School, a referral should also be made to CSC.

### Prevention

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse. The actions we take are noted in our ; Anti-Bullying Policy; Behaviour, Conduct and Discipline Policy; and our policy on Relationships Education, Relationships and Sex Education and Health Education.

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	• Single instances of inappropriate sexual behaviour	• Problematic and concerning behaviours	• Victimising intent or outcome	• Physically violent sexual abuse
Socially acceptable	• Socially acceptable behaviour within peer group	• Developmentally unusual and socially unexpected	• Includes misuse of power	• Highly intrusive
Consensual, mutual, reciprocal	• Context for behaviour may be inappropriate	• No overt elements of victimisation	• Coercion and force to ensure victim compliance	• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision making	• Generally consensual and reciprocal	• Consent issues may be unclear	• Intrusive	• Sadism
		• May lack reciprocity or equal power	• Informed consent lacking, or not able to be freely given by victim	
		• May include levels of compulsivity	• May include elements of expressive violence	

## 10 Children who are absent from education

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

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

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

- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

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

### **Missing Pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Please see the school's separate Crisis Management Plan and Missing Child Policy and Attendance and Children Missing Education Policy for further details regarding a child who goes missing.

## **II Confidentiality and sharing information**

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff must not promise confidentiality to a child and will always act in the best interests of the child.

Staff should only discuss concerns with the DSL, the deputy DSL, Headmaster or Chair of Governors (depending on the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The school will co-operate with police and CSC to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children (2023).

Where allegations have been made against staff, the school will consult with the LADO SERVICE and, where appropriate, the police and CSC to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

Written information regarding concerns is only made available to relevant individuals.

The school should ensure that staff have the training and confidence to know how and to whom they can share sensitive safeguarding information when dealing with a safeguarding concern. This toolkit is useful: DfE – Data Protection Took Kit for Schools - [click here](#)

## 12 Related safeguarding policies and procedures (for reference)

The following documents are available via the Staff Shared Area.

- Safeguarding & Child Protection Policy
- Anti-Bullying Policy
- Behaviour, Conduct and Discipline Policy
- Code of Conduct
- Parental Complaints Policy
- Data protection Policy
- First Aid Policy
- Staff Recruitment Policy
- ICT Policy – Staff
- ICT Policy – Pupils
- Keeping Children Safe in Education
- Crisis Management Plan
- Whistleblowing Policy
- Special Educational Needs
- The Prevent Duty

## 13 Key service and professional contacts

<b>Kingston: Single Point of Access (SPA) Team (Kingston Initial Response Team)</b>	020 8547 5008 Out of hours / weekends duty social worker: 020 8770 5000
<b>Local Authority Designated Officer (Kingston LADO SERVICE)</b>	07774 332675
<b>DSL and Prevent Lead</b>	Lucia Sanderson
<b>Deputy DSL and Deputy Prevent Leads</b>	Kerry Bratt, Tom Taylor, Victoria Hayward, Fleur Tattersall
<b>Safeguarding and Prevent Governor</b>	James Kelly
<b><u>Local Safeguarding Children Partnerships</u></b> Kingston and Richmond SG Children Partnership:	Tel: 07834 386459
Merton SG Children Partnership:	Tel: 020 8545 4226 (out of hours 020 8770 5000)
Wandsworth SG Children Partnership:	Tel: 020 8871 6622 (out of hours 020 8871 6000)
Sutton SG Children Partnership:	Tel: 020 8770 6001 (out of hours 020 8770 5000)
<b>DfE Counter Extremism Helpline</b>	020 7340 7264
<b>NSPCC</b>	0808 800 5000 TEXT 88858



## **Appendix I      Signs and Types of ABUSE**

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

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

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

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

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse ( ). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual

assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

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

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

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

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

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

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

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

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

**Upskirting:** is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

**Serious violence:** indicators which may signal that children are at risk from or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

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

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

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

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

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

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

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

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

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

Some of the following can be indicators of CCE:

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

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

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

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

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

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

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them

to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

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

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

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

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

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

**So called ‘honour based’ abuse:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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

**FGM:** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. Rokeby is a boy’s school however staff should be aware that female siblings and other family members may be at risk of FGM. If staff have a concern that a child may be at risk of FGM, they should speak to the DSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children’s Social Care.

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

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. It is illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion are not used. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social

media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

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

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

**Lesbian, gay, bi or gender questioning ("LGBT"):** The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The school should take a cautious approach to support the child and consider the broad range of the individual needs. This should be done in partnership with their parents/carers, include any clinical advice that is available and consider how to address wider vulnerabilities. It is important that staff 'create a culture' where pupils can speak out or share any concerns.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed



towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

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

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

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

**Children who are absent from education:** A child being absent from School is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called ‘honour’-based abuse or risk of forced marriage. Staff must follow the school’s procedures for dealing with children who are absent, particularly persistently. All unexplained absences will be followed up in accordance with this the Missing Children Policy.

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

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and

- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation, or radicalisation.

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

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

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

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

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

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

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

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

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

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

## **Appendix 2 Procedure to be followed in the event of an allegation against a member of staff or volunteer of abuse**

The DFE has issued statutory guidance which all schools and local authorities must follow when a potential child protection allegation is made against a member of staff. The guidance is contained within the document: Keeping Children Safe in Education (2024). It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer will comply at all times with statutory guidance.

### **I The School's procedures**

The school's procedures for dealing with allegations made against staff or volunteers or supply teacher will be used where the member of staff or volunteer is alleged to have met one or more of these criteria for a referral:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

This procedure relates to members of staff who are currently working in the school regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the school will be referred to the LADO SERVICE, or, in an emergency to the police.

If an allegation is made against a member of staff or volunteer, the school's priority will be to achieve a resolution of that 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. All such allegations must be dealt with as a priority without delay. The Headmaster or Chair of Governors will inform the LADO SERVICE and await advice from the LADO SERVICE before taking any internal action.

The following definitions are to be used when determining the outcome of allegation investigations, all of which would be conducted under the lead of the LADO SERVICE

- (a) Substantiated: there is sufficient evidence to prove the allegation;
- (b) False: there is sufficient evidence to disprove the allegation;
- (c) Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- (d) 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.

### **2 Reporting an allegation against staff, supply teachers or volunteers**

All allegations, complaints, concerns or suspicions against staff or volunteers at Rokeby, including any made against the DSL, or DDSL, should be reported directly to the **Headmaster**, or in his absence to the **Chair of Governors**, unless that person is the subject of the concern. If there is a conflict of interest in reporting the matter to the Headmaster, it should be reported directly to the LADO SERVICE.

All allegations, complaints, concerns or suspicions about the Headmaster should be reported to the **Chair of Governors** (or in her absence, the Vice Chair).

All allegations, complaints, concerns or suspicions about the Chair of Governors should be reported to the LADO SERVICE without the Chair of Governors being informed. The LADO SERVICE may choose to appoint a 'case manager'.

The Headmaster or Chair of Governors (or Vice Chair), as appropriate, (the 'case manager') will inform the LADO SERVICE based on the established statutory criteria for such a referral (see above). The case manager will also inform the DSL, or, if the DSL is the subject of the allegation, the DDSL (in accordance with KCSIE 2024, part one, paragraph 17). If the Chair of Governors (or Vice Chair) has contacted the LADO SERVICE with allegations, complaints, concerns or suspicions about the Headmaster, the Headmaster will not be informed of this referral. The school will not investigate any allegations, complaints, concerns or suspicions against staff, the Headmaster or the Chair of Governors before making a referral to the LADO SERVICE.

The LADO SERVICE will be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria and the LADO SERVICE may consult the police and children's services as appropriate. In borderline cases, or where there is room for doubt as to whether to make a referral, the case manager will still consult the LADO SERVICE informally for advice before any investigation takes place and within one working day. The LADO SERVICE may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

The LADO SERVICE's contact details can be found in section 13 of the Child Protection Procedures.

The case manager will not undertake an investigation of allegations without prior consultation with the LADO SERVICE so as not to jeopardise statutory investigations. Borderline cases will be discussed informally with the LADO SERVICE without naming the school or individual until the LADO SERVICE has advised whether a referral is required. If any allegations do not meet the criteria, the school will operate safeguarding procedures in accordance with the Kingston and Richmond Safeguarding Partnership's safeguarding arrangements. All such cases will be handled within the school without delay. All discussions with the LADO SERVICE will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO SERVICE, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO SERVICE what action should follow both in respect of the individual and those who made the initial allegation.

### **3 Disclosure of information**

The case manager will inform the accused person as soon as possible after consulting the LADO SERVICE and will provide as much information as possible at that time.

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 should be told the outcome in confidence.

Where the LADO SERVICE advises that a strategy discussion is needed, or police or CSC services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from the LADO SERVICE, police and children's social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip; and
- What, if any, information can be reasonably given to the wider community to reduce speculation; and how to manage press interest if and when it should arise.

As a school we must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply to the point where the accused person is charged with an offence or the DfE publish information about an investigation or decision in a disciplinary case.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

### **4 Action to be taken against the accused**

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 given an explanation of the likely course of action, 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. He/she will also be given access to welfare counselling and medical advice.

The case manager will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues. In the case of an allegation against a supply teacher, the school should inform the supply agency who should be fully involved with the LADO SERVICE's enquiries.

Where an investigation by the police or CSC is unnecessary, the LADO SERVICE will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake further enquiries to determine the appropriate action. If so, the LADO SERVICE will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Kingston and Richmond Safeguarding Partnership.

## **5 Suspension**

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- (a) there is cause to suspect a child or other children at the school is or are at risk of significant harm or
- (b) the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the school or providing an assistant when the individual has contact with children. The school will give due weight to the views of the LADO SERVICE when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded, and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

## **6 Criminal proceedings**

The school will consult with the LADO SERVICE following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

## **7 Return to work**

If it is decided that the person who has been suspended should return to work, the school will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The school will also consider how to manage the contact with the child(ren) who made the allegation.

## **8 DBS and TRA Referrals and Ceasing to use staff**

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, or if they would have been removed for this reason, a

settlement/compromise agreement must not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met – see above – as per the guidance published by the DBS. Failure to do so constitutes a **criminal offence**.

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met – see above – as per the guidance published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA. For information, the reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Governors without delay.

The school also requires staff working in a relevant setting (early years provision and later years (up to age 8) provision which constitutes after school and before school childcare) to complete a self-declaration form which seeks to establish if they are disqualified to work with children, i.e. if they are found to have committed an offence which is included in the 2009 Regulations (a 'relevant offence') this includes (a) being convicted of a relevant offence or (b) on or after 6 April 2007, being given a caution, reprimand or warning for a relevant offence (a list of which is provided by the school).

## **9 Timescales**

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Headmaster should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

## **10 Unsubstantiated, false or malicious allegations**

Where an allegation by a child is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the school's behaviour and discipline policy.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.

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

## **11 Record keeping and references**

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will 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 will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The school will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the school's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

## **12 Learning lessons**

At the conclusion of a case in which an allegation is substantiated, the LADO SERVICE should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO SERVICE and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.



**Appendix 3 Confirmation of receipt of Safeguarding Policies and Training, Part One of KCSIE & Code of Conduct, DSL details**

Name: \_\_\_\_\_

Date of joining School: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Date of induction: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Name of designation of staff member responsible for induction: \_\_\_\_\_

- I confirm that I have received, read and understand the School's Safeguarding and Child Protection Policy, including the procedure for reporting concerns about a child, and the Staff Code of Conduct.
- I confirm that I have read and understand part one of Keeping Children Safe in Education.
- I confirm I understand the expectations, roles and responsibilities for staff around filtering and monitoring.
- I confirm that I have been made aware of my duty to safeguard and promote children's welfare (see below).
- I confirm that I know the identity of the Designated Safeguarding Lead and deputy and how to contact them.

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for children. All school staff should:

- place the safety and welfare of children above all other considerations
- treat all members of the school community, including children, parents, colleagues and governors with consideration and respect
- adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies
- treat each child as an individual and make adjustments to meet individual need
- demonstrate a clear understanding of and commitment to non-discriminatory practice
- recognise the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused
- understand that school staff are in a position of trust
- be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of significant harm
- encourage all children to reach their full potential
- never condone inappropriate behaviour by children or staff
- take responsibility for their own continuing professional development
- refrain from any action that would bring the school into disrepute
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

Signature: \_\_\_\_\_

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Please sign and return this form to the Designated Safeguarding Lead:

DSL Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**THIS FORM MUST BE RETURNED TO THE DSL.**

## **Appendix 4     Rokeby Safeguarding Children Policy in regard to the EYFS setting**

Over and above the Rokeby Safeguarding Children Policy, within the EYFS setting we ensure the rights and safety of every child and we aim to give each child the very best start to their school life.

If you are worried about a child within the EYFS setting please share your concerns with the Head of EYFS, Victoria Hayward

### **Child Protection Guidelines**

- Volunteers and visitors do not work unsupervised
- We take security steps to ensure that we have control over who comes into the school so that no unauthorised person has unsupervised access to the children
- The layout of the rooms allows for constant supervision. No child is left alone with staff or volunteers in a one-one situation without being visible to others.
- Each child within the EYFS is given a named key worker.
- We introduce key elements of child protection into our curriculum to promote the personal, social and emotional development of all our children, so they may grow to be 'strong, resilient and listened to' and so they develop an understanding of why and how to keep safe.
- We create within the setting a culture of value and respect for the individual, having a positive regard for children's heritage arising from their ethnicity, language, cultural or social background
- We ensure that this is carried out in a way that is developmentally appropriate for the children within the EYFS setting

### **Staff Qualifications**

All staff in the EYFS setting must hold at least a full and relevant level 2 child care qualification. All members of the Foundation Stage team should also hold a level 2 qualification in both literacy and maths.

All newly qualified entrants to the early years team with full and relevant level 2 and/or level 3 qualifications must hold a PFA (paediatric first aid) certificate before they can be included in the statutory staff : child ratios in our early years setting.

All staff are supported in undertaking appropriate training and professional development to ensure they can continually improve the quality learning and development experiences they offer for children.

### **Supervision**

Supervision meetings now go under the heading of 'Line manager meetings' and are held on a termly basis with all members of the foundation team. The concept of 'supervision' is a way for staff to discuss issues and identify solutions as well as receive coaching to improve their personal effectiveness. The line manager meetings are held on an individual meeting basis between the manager and each staff member, including teaching assistants, in order to support their role as key persons working with children and their families. The frequency of meetings can be changed according to the needs of the families and the staff member supporting them, but will usually be held termly. This is in addition to regular staff appraisals and other opportunities for staff training.

The EYFS team also hold a weekly 'Boys Forum' meeting. This gives team members the opportunity to discuss the development of the boys, key achievements and areas for concern.

All staff working in the Early Years will receive induction training and will be fully briefed in relation to the school settings, policies, curriculum and daily practice. Staff induction includes a requirement for all staff to familiarise themselves with the Foundation Stage policy, Child Protection procedures and the Rokeby Safeguarding policy.

Induction training for will include:

1. help in understanding roles and responsibilities;
2. information about emergency evacuation procedures;
3. safeguarding and child protection;
4. the provider's equality policy;
5. health and safety issues.

### **Electronic devices with image sharing capabilities within Rokeby EYFS**

To ensure the safety and welfare of the children in our care this policy outlines the protocols for the use of personal electronic devices with image sharing capabilities.

**Parents** are requested:

- Not to take photos on phones or cameras of boys within the school premises other than of their own child.
- Not to use phones for texts or calls during school events.
- To have their phones off or on silent during school events
- On school trips photos are permitted, but we request that you only share photos of your own son online.
- During school shows, such as class assemblies and the nativity production, parents will be given the opportunity to take photos after the performance. We request that you refrain from taking pictures during and only share pictures of your own son online.
- Parents will be asked to inform us should they not want their son's image published on the school website.

### **Staff**

- Phones should be stored securely during teaching periods.
- Photos for evidence/assessment or sharing should only be taken on school devices.
- During school trips staff members should carry a school or personal mobile to ensure the trip leader can contact them at all times in case of separation.
- Staff bringing personal devices into Reception must ensure there is no inappropriate or illegal content on the device.
- If any member of staff has a family emergency or similar and are required to keep their mobile phone to hand, prior permission must be sought from the Head of Lower School.

### **Staff : child ratios**

- Sufficient staff will always be on duty so that the needs of all the children are met and safety ensured
- All children must be supervised at all times
- Children must usually be within sight and hearing of staff and always within sight or hearing.
- Staff aged 17 or over are included in the adult/child ratios
- Staff under 17 must be supervised at all times.

- Within the reception class settings for qualified teachers will be 1 adult for a maximum of 30 children
- For visiting nursery children there will be 1 adult for every 13 children with at least 1 other member of staff holding a full and relevant level 3 qualification
- During lunch at break times the reception children will be supervised by a staff member holding at least a full and relevant level 2 child care qualification. All members of the EYFS team will be on site and readily available if required

These statements should be read in conjunction with this policy, The Foundation Stage Policy and risk assessments regarding EYFS at Rokeby School.