



HARRODIAN

Safeguarding Children & Child Protection Policy

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1. Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

2. Significant Information

Key External Agencies, Services and Professionals' Contact Details

Single Point of Access (SPA) Team (Richmond Initial Response Team)	1st Floor, Civic Centre, 42 York Street Twickenham TW1 3BW	020 8547 5008 for out of hours / weekends: Tel. 020 8770 5000 spa@richmond.gov.uk https://www.richmond.gov.uk/single_point_of_access
Local Authority Designated Office (LADO)	Achieving for Children Guildhall II, Kingston upon Thames	020 8891 7370 or SPA: 020 8547 5008 for out of hours / weekends: Tel. 020 8770 5000 spa@richmond.gov.uk
Police Child Abuse Investigation Team (CAIT)	Feltham Police Station, 34 Hanworth Road, Feltham, TW13 5BD	020 8247 6331
Police non-emergency point of contact		101
Kingston and Richmond Safeguarding Children Partnership	Ground Floor 44 York Street Twickenham TW1 3BZ	0208 831 6323 / 07834 386459 Lscb-support@kingrichlscb.org.uk
Richmond Child and Adolescent	Contact via	020 8547 5008

Mental Health Services (CAMHS)	Richmond Single Point of Access	for out of hours / weekends: Tel. 020 8770 5000 spa@richmond.gov.uk
NSPCC	For concerns about a child Childline helpline for those 18 and Under	0808 800 5000 0800 11 11
'Prevent' Contacts		DFE contact: 020 7 340 7264 counter.extremism@education.gsi.gov.uk

3. Introduction and purpose

Harrodian fully recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils. This Safeguarding and Child Protection Policy is one of a range of documents which set out the safeguarding responsibilities of the School. We wish to create a safe, welcoming and vigilant environment for children where they feel valued and are respected.

We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We are aware that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We are able to play a significant part in the prevention of harm to our children by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection.

Wherever the word "staff" is used, it covers all staff on site, including ancillary, supply and self-employed staff, contractors and volunteers. It seeks to set out the principles and procedures we operate to protect children from harm. This policy provides information regarding our safeguarding responsibilities and details how these responsibilities should be carried out.

4. Key Personnel

Designated Safeguarding Lead with overall responsibility for Safeguarding in the School

Mrs Heather Locke (Deputy Head and Director of Studies)



**Tel 020 8748 6117 Extension 168
Mobile 07957 168825
hlocke@harrodian.com**

Designated Safeguarding Lead responsible for Pre-Prep School

Miss Lucy Horan (Head of Pre-Prep)



**Tel 020 8748 6117 Extension 154
lhoran@harrodian.com**

<p>Designated Safeguarding Lead responsible for Safeguarding in the Prep School</p> <p>Mrs Jenny O'Neill</p>  <p>Tel 020 8748 6117 Extension 175 joneill@harrodian.com</p>	<p>Designated Safeguarding Lead responsible for Safeguarding in the Senior School and Sixth Form</p> <p>Miss Alison Heller</p>  <p>Tel 020 8748 6117 Extension 175 Mobile 07834 608302 aheller@harrodian.com</p>
<p>The Headmaster Mr James Hooke</p>  <p>Tel 020 8748 6117 Extension 126 headmaster@harrodian.com</p>	<p>Safeguarding Governor Mrs Rachael Snaith</p>  <p>Tel 020 8748 6117 Extension 153 rsnaith@harrodian.com</p>

5. Policy principles and aims

This policy aims to demonstrate to pupils, parents and other partners, Harrodian's commitment to safeguarding and child protection.

The welfare of our children is paramount. All children, regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

We recognise that all adults in our School have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.

Our School is committed to providing an environment in which children and young people feel safe, secure, valued and respected and which promotes their social, physical and moral development. Children in our School feel confident and know how to approach adults if they are in difficulties.

This policy is used in conjunction with staff training and continued professional development to:

- raise staff awareness of the need to safeguard children and their responsibilities in identifying and reporting possible cases of abuse
- provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children
- emphasise the need for good levels of communication between all members of staff and develop and promote effective working relationships with other agencies, especially Achieving for Children (AfC) and the police
- develop a structured procedure within the School which will be followed by all members of the School community in cases of suspected abuse; ensure that the structured procedure is followed by School staff in cases of suspected abuse

Pupils and staff involved in child protection issues will receive appropriate support.

6. Statutory framework, key statutory and non-statutory guidance

In order to safeguard and promote the welfare of children, Harrodian will act in accordance with the following legislation and guidance:

- **Children Act 1989 Care Planning, Placement and Case Review**
- **Children Act 2004**
- **Education Act 2002**
- **London Child Protection Procedures and Practice Guidance**
- **Keeping Children Safe in Education 2019**
- **Working Together to Safeguard Children 2018**
- **What to do if You're Worried a Child is Being Abused**
- **Information Sharing**

We take seriously our responsibility to ensure that we have appropriate procedures in place for responding to situations in which we believe that a child has been abused or is at risk of abuse.

Our procedures also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

We will take steps to ensure that any groups or individuals who hire and/or use our building or grounds inside or outside of School hours, follow the local child protection guidelines and are aware of their safeguarding duties.

We will ensure that all staff read and understand:

- Harrodian's Safeguarding and Child Protection policy
- Keeping Children Safe in Education (2019) [Part One] and school leaders and staff that work directly with children will also read Annex A
- Harrodian's code of conduct for School staff

We will ensure that all staff are aware of:

- Harrodian's Behaviour Policy
 - The safeguarding response to children who go missing from education
 - The role of the Designated Safeguarding Leads
 - The identity of Harrodian's Designated Safeguarding Leads and The Safeguarding Governor
- Harrodian will publish our Safeguarding and Child Protection policy on our website and hard copies will be available on request from the School office.

The roles of the Designated Safeguarding Leads and the Safeguarding Governor will be explicit in their job descriptions and we will ensure that they have the time and resources to fulfil their duties.

7. Roles and responsibilities

The Safeguarding Governor

The Safeguarding Governor of the School has the overarching responsibility to ensure that the School is compliant with statutory child protection requirements and adheres to the guidance laid out in KCSIE 2019 and Working Together to Safeguard Children 2018.

The Safeguarding Governor will ensure that:

- the DSLs for safeguarding and child protection have undertaken the approved Kingston and Richmond Safeguarding Children Partnership training in inter-agency working, in addition to basic child protection training
- the child protection policy, and procedures that are consistent with Kingston and Richmond Safeguarding Children Partnership requirements, are reviewed annually and made available to parents on the School website
- procedures are in place for dealing with allegations of abuse made against members of staff including allegations made against the Headmaster, KCSIE 2019, Part 4
- safer recruitment procedures are in place that include the requirement for appropriate checks in line with national guidance, KCSIE 2019 Part 3

- a training strategy is in place that ensures all staff, including the Headmaster and Safeguarding Governor, receive regular child protection training, with annual refresher training. The DSLs should receive Level 3 refresher training at two-yearly intervals
- arrangements are made to ensure that all temporary staff and volunteers are aware of the School's arrangements for child protection
- the Safeguarding Governor is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headmaster. An annual report will be submitted to the local authority about how the governing body's duties have been carried out. Any weaknesses or areas of concern will be rectified without delay

The Headmaster

The Headmaster will ensure that:

- the safeguarding and child protection policy and related policies and procedures are implemented and followed by all staff
- sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the Designated Safeguarding Leads and Safeguarding Governor to carry out their roles effectively
- where there is a safeguarding concern, that the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- he, or the Lead DSL, liaises with the local authority designated officer (LADO) within 24 hours, before taking any action and then on an ongoing basis, where an allegation is made against a member of staff or volunteer

The designated safeguarding leads (DSLs)

- Hold ultimate responsibility for safeguarding and child protection in Harrodian. This responsibility will not be delegated.
- Act as a source of support and expertise for the whole School community in regards to our safeguarding duties.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Undertake multi-agency (Level 3) safeguarding training with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually.
- Will refer a child if there are concerns about possible abuse, to Achieving for Children's Single Point of Access (SPA) and/or the local authority where the child resides and act as a focal point for staff to discuss concerns.

- Will keep detailed, accurate records using My Concern – the School’s online software, of all concerns about a child even if there is no need to make an immediate referral.
- Will keep any written, hard copy records that may exist confidential, stored securely and separate from the pupil’s general file and ensure that an indication of the existence of the additional safeguarding and child protection file is marked on the pupil general file using a red dot.
- When pupils leave Harrodian, the School will ensure that their child protection file is transferred to the new school or college as soon as possible. This will be transferred separately from their main pupil file, ensuring secure transit and a confirmation of receipt will be requested and retained.
- Will liaise with the local authority and work with other agencies and professionals in line with *Working Together to Safeguard Children*.
- Have a working knowledge of Kingston and Richmond Safeguarding Children Partnership and Achieving for Children procedures. Will ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report, where required, which has been shared with the parents and child (depending on age and understanding).
- Notify Children’s Social Care if a child subject to a child protection plan is absent from School without explanation.
- Will ensure that all staff sign to say they have read, understood and agree to work with Harrodian’s safeguarding and child protection policy, staff behaviour policy (code of conduct) and *Keeping Children Safe in Education 2019 Part 1* and *Annex A* and ensure that the policies are used appropriately.
- Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all School staff, keep a record of attendance and address any absences.
- Will undertake with the Headmaster and the Safeguarding Governor, an annual audit of Harrodian’s safeguarding policies, procedures and practices and ensure that this is submitted to Kingston and Richmond Safeguarding Children Partnership.
- Have an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation.
- Will ensure that the name of the designated safeguarding leads, are clearly advertised in the School and on the website, with a statement explaining the School’s role in referring and monitoring cases of suspected abuse.
- Will ensure that they are available during term time school hours for staff to discuss any safeguarding concerns.
- Will ensure that there are adequate and appropriate cover arrangements for any out of hours or out of term activities.

All School staff

- Understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- Consider, at all times, what is in the best interests of the child.
- Know how to respond to a pupil who discloses abuse.
- Will refer any safeguarding or child protection concerns to the designated safeguarding leads using "My Concern". If the concern is urgent it is important that staff tick this box and also contact the relevant DSL in person as soon as possible.
- If for any reason "My Concern" is not available, all details should be recorded on the 'Record of Concern Form' and handed to the relevant designated safeguarding lead as soon as possible.
- If necessary where the child is at immediate risk, staff should contact the police or Single Point of Access (SPA), or if a child lives out of the borough, to the relevant local authority. Heather Locke should be contacted by mobile phone as soon as possible to inform her that this referral has been made. If she is unavailable a voice message should be left and a text sent.
- Will provide a safe environment in which children can learn.

8. Safe School, safe staff

We will ensure that:

- at least one member of every recruitment panel has completed safer recruitment training within the last five years
- safer recruitment practices are adhered to including appropriate DBS checks, reference checks and any additional checks relevant to the role undertaken
- all staff are aware of the need for maintaining appropriate and professional boundaries in their relationship with staff, pupils and parents and adhere to Harrodian's code of conduct
- adequate risk assessments are in place including for off-site activities, after school and lunchtime clubs and residential trips
- any disciplinary proceedings against staff related to child protection matters are concluded in full in accordance with Government guidance *Keeping Children Safe in Education 2019* and Kingston and Richmond Safeguarding Children Partnership and LADO procedures and guidance
- staff are fully aware of how, and have the confidence, to report misconduct
- all staff receive information about Harrodian's safeguarding arrangements, safeguarding statement, staff code of conduct, safeguarding and child protection policy, the role and names of the designated safeguarding leads, the role of the Safeguarding Governor and *Keeping Children Safe in Education 2019 part 1* and *Annex A* on induction

- all staff receive safeguarding and child protection training at induction which is regularly updated. In addition, they receive safeguarding and child protection updates (for example, via email and staff meetings), as required, but at least annually
- all members of staff are trained in and receive regular (at least once a year) updates in online safety and reporting concerns
- all staff and governors have regular safeguarding awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse
- the safeguarding and child protection policy is made available via our School website or other means and that parents and carers are made aware of this policy and their entitlement to have a copy via the School handbook, newsletter or website
- all parents and carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the safeguarding and child protection policy on the School website
- Harrodian provides a co-ordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans
- the names of the designated safeguarding leads are clearly advertised on the School website with a statement explaining the Harrodian's role in referring and monitoring cases of suspected abuse
- all staff will be given a copy of Part 1 and *Annex A of Keeping Children Safe in Education 2019* and will sign to say they have read and understood it

Extended school and off-site arrangements

- If other organisations provide services or activities on our site, we will ensure that they have appropriate procedures in place, including safer recruitment procedures.
- When our pupils attend off-site activities, we will ensure that effective child protection arrangements are in place.
- When our pupils attend an alternative provision provider, we will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff.
- If our pupils were to stay with host families abroad (for example, as part of a language exchange) the School will ensure that all available local safeguarding checks are carried out, compliant with the laws and regulations in force in the host jurisdiction. Parents will be informed of the extent of these checks to enable them to make a decision about whether their child should participate.

Photography and images/use of mobile phones

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 pupils we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- use only the pupil's first name with an image
- ensure that pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- ensure that pupils do not take photographs or video images of other students without their express permission and the permission of a member of staff

From time to time the School will use photographs of pupils for bona fide promotional purposes, e.g. newsletters, prospectuses etc. Likewise photographs, video clips, children's work will be published on the School's website. Parents are issued with a consent form allowing them to opt into various permissions.

Photographs, digital images and videos of pupils may be taken by parents and family members, either on the School site or when pupils are involved in organised off-site activities. Parents and family members are welcome to take photographs or videos of School events which may include images of other pupils. To respect the privacy of others and for safeguarding purposes, these images must not be circulated or made publicly available on social networking sites or on other public areas of the internet (e.g. by email, on social networking sites e.g. Facebook, on YouTube etc.)

Parents may **not** take photographs of their children or fellow pupils in the swimming pool.

Use of mobile phones

To protect children staff will:

- only use mobile phones appropriately
- ensure all mobile phone use is open to scrutiny and that staff have a clear understanding of what constitutes misuse and know how to minimise the risk
- ensure that staff self-police and are responsible for their own behaviour regarding the use of mobile phones and are informed that they should avoid putting themselves into compromising situations, which could be misinterpreted and lead to potential allegations
- as a general rule, not take pictures of pupils using their personal mobile phones. There may however be certain occasions when this is desirable. If this is the case, for example on School trips or events within School, these images will be sent/copied to the appropriate person/people at School, and the images then deleted from the mobile phone and not stored either on the mobile phone or externally
- ensure the use of mobile phones on outings is included as part of the risk assessment, for example, how to keep personal numbers that may be stored on the phone safe and confidential
- ensure the use of a mobile phone, for example checking their mobile phone, making calls, sending text messages etc, does not detract from the quality of supervision and care of pupils both inside and out of the classroom

- ensure staff are vigilant and alert to any potential warning signs of the misuse of mobile phones by others

Harrodian mobile

To protect children we will ensure that the Harrodian mobile:

- is only used by allocated people
- is protected with a password
- is clearly labelled
- is stored securely when not in use
- is not used in areas such as toilets and changing rooms
- if used for taking photographs; images will be deleted regularly and the permission given by parents and carers will be recorded

9. Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff will receive regular safeguarding refresher training, at appropriate levels, as and when required, to keep up with any relevant safeguarding and child protection developments. The training will be in accordance with Kingston and Richmond Safeguarding Children Partnership guidance and will include local inter-agency working principles. New staff will receive training during their induction.

Date of last Safeguarding Level 2 to all staff took place on 4th January 2017

Refresher training for all staff has been arranged and will take place during the first half of Autumn Term 2019. Dates to be confirmed.

10. Teaching and Learning

We have a strong safeguarding culture at our School, championed by our DSLs and pastoral team. Pupils are reminded of how to keep safe and who to speak to if they have a problem. In addition, during assemblies, form time and lessons our PSHE program has been mapped to ensure that age appropriate learning takes place around the following topics:

- personal safety
- who to talk to
- stranger danger
- road safety

- fire safety
- online safety
- sexting
- bullying (including cyber, racist, homophobic and gender related bullying)
- positive relationships
- CSE
- so-called 'honour based' violence
- FGM
- radicalisation and extremism
- self-esteem
- knife crime
- drugs and alcohol

11. Child protection overview and specific safeguarding concerns

Recognising abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), 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

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

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Definitions taken from *Working Together to Safeguard Children (HM Government, 2018)*

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'It could happen here'.

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the child, for example, call 999
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day
- 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
- any concerns should be recorded on My Concern. If the concern is urgent it is important that staff tick this box and also contact the relevant DSL in person as soon as possible
- if for any reason My Concern is not available, all details should be recorded on the “Record of Concern Form” and handed to the relevant designated safeguarding lead as soon as possible
- if it comes to attention **outside of school hours or outside of term time** that a pupil may be in immediate danger or is at risk of harm the police should be called immediately on 999. Heather Locke should be contacted by mobile phone (07957 168825) as soon as possible to inform her that this referral has been made. If she is unavailable a voice message should be left and a text sent to her mobile phone.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Harrodian recognises that exposure to 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. Harrodian acknowledges that domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Homelessness

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

Indicators that a family may be at risk of homelessness include:

- household debt
- rent arrears
- domestic abuse and anti-social behaviour
- the family being asked to leave a property

If a child has been harmed or is at risk of harm from homelessness, a referral to children's social care will be made by one of the School's Designated Safeguarding Leads.

Children missing education

We recognise that full attendance at School is important to the wellbeing of all our pupils and enables them to access the opportunities made available to them at School. Attendance is monitored closely and we work in partnership with AfC when patterns of absence give rise to concern.

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. We will ensure, where possible, that we have more than one emergency contact number for each pupil. This will give the School additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Our attendance policy is set out in a separate document and is reviewed regularly by the Deputy Head. The School operates in accordance with statutory guidance *Children Missing Education* (DfE 2016) [Children Missing Education Statutory Guidance](#).

Children who run away or go missing from home or care

Harrodian recognises that children who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

Keeping Children Safe in Education 2019 highlights that *Statutory Guidance on Children who Run Away or go Missing from Home or Care* (DfE 2014) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, Harrodian will facilitate return home interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the School site for the interview to take place.

Children with family members in prison

Harrodian recognises that children who have a family member in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The School will work with agencies and resources such as NICCO to help mitigate negative consequences for those children.

Peer on peer abuse

Occasionally, allegations may be made against pupils by others in the School, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the School
- indicates that other pupils may have been affected by this student
- indicates that young people outside the School may be affected by this student

Examples of safeguarding issues against a pupil could include:

- **physical abuse:** violence, particularly pre-planned, forcing others to use drugs or alcohol
- **emotional abuse:** blackmail or extortion, threats and intimidation
- **sexual abuse:** indecent exposure, indecent touching or serious sexual assaults, forcing others to watch pornography or take part in sexting
- **sexual exploitation:** encouraging other children to attend inappropriate parties, photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older pupils may attempt to recruit younger pupils using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

What to do:

- When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding leads should be informed.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact children's services to discuss the case. It is possible that children's services are already aware of safeguarding concerns around the young person. The DSL will follow through the outcomes of the discussion and make a children's services referral where appropriate.

- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim).
- It may be appropriate to exclude the pupil being complained about for a period of time according to Harrodian's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough School investigation should take place into the matter using the School's usual disciplinary procedures.
- In situations where the School considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Sexual violence and sexual harassment

Harrodian follows the DfE's advice about sexual violence and sexual harassment between children in schools and colleges: [Sexual Violence and Sexual Harassment between Children in Schools and Colleges \(DfE May 2018\)](#).

Sexual violence and sexual harassment can occur between two pupils of any sex. They can also occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils.

It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. Harrodian will ensure that **all** victims are taken seriously and offered appropriate support.

Sexual violence and sexual harassment is not acceptable at Harrodian. Behaviours such as making sexual remarks, grabbing bottoms, breasts and genitalia is not 'banter' or 'having a laugh' and will never be tolerated.

Harrodian recognises that the following pupils can be especially vulnerable to sexual violence and sexual harassment:

- Children with Special Educational Needs and Disabilities (SEND)
- Pupils who are Lesbian, Gay, Bi, or Trans, Questioning (LGBTQ) or who are perceived to be LGBTQ by their peers.

Sexual violence:

Sexual violence refers to sexual offences under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent: Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment:

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

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- sexual 'jokes' or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
- online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (see Youth produced sexual imagery (Sexting) p. 28); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be stand alone, or part of a wider pattern of sexual harassment and/or sexual violence

Harmful sexual behaviours:

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours refers to problematic, abusive and violent sexual behaviours which are developmentally inappropriate and may cause developmental damage. For more information see [NSPCC Harmful Sexual Behaviours](#).

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age 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. A useful tool is: [Brook Traffic Light Tool](#).

Harmful sexual behaviours will be considered in a child protection context.

Harrodian recognises that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

Harrodian has a clear set of values and standards and these will be upheld and demonstrated throughout all aspects of School life. The School has a Behaviour Policy and Anti-Bullying Policy.

The PSHE curriculum covers the following issues according to the age and stage of development of the pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment is always wrong
- addressing cultures of sexual harassment

Responding to allegations of sexual harassment and sexual violence

Harrodian will make decisions on a case-by-case basis, with the DSLs taking a leading role and using their professional judgment, supported by other agencies, such as children's social care and the police as required.

The management of children and young people with sexually harmful behaviour is complex and Harrodian will work with other relevant agencies to maintain the safety of the whole School community.

A risk and needs assessment will be completed for all reports of sexual violence. The need for a risk and needs assessment for reports of sexual harassment will be considered on a case by case basis. The assessment will consider:

- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at the School, especially any actions that are appropriate to protect them

Harrodian will ensure that appropriate measures are put in place to safeguard and support the victim, the alleged perpetrator and the School community.

Up skirting

Harrodian will ensure that all staff and pupils are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."

Incidents of up skirting in the school will not be tolerated. Harrodian will make decisions on a case-by-case basis, with the DSL taking a leading role and using their professional judgment, supported by other agencies, such as children's social care and the police as required.

Child sexual exploitation (CSE)

Harrodian follows the *London Child Protection Procedures* for safeguarding children from sexual exploitation. [*Safeguarding Children from Sexual Exploitation*](#)

In February 2017, the government updated the working definition of child sexual exploitation [*Child sexual exploitation definition and guide*](#)

"Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events, or understanding that these constitute abuse.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Child sexual exploitation:

- 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

- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child's or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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

Consent

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Key factors in child sexual exploitation

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Links to other kinds of crime

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution

- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

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

Possible indicators of child sexual exploitation

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

- Self-harm or significant changes in emotional wellbeing.
- Online exploitation.

All young people are at risk from online exploitation, and can be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can be quickly and easily shared with others which makes it difficult to contain the potential for further abuse.

Children may be perpetrators of abuse

It must be recognised that children may also be perpetrators of abuse, sometimes at the same time as being abused themselves.

County lines: child criminal exploitation

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes.

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

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

For more information see: [Criminal exploitation of children and vulnerable adults: county lines](#)

Online safety

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies

to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in School. Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community. Please see our *Online Safety Policy* for further guidance.

Harrodian's online safety policy which is available on our website and via the School office, explains how we keep pupils safe in School and protect and educate pupils in the safe use of technology.

Harrodian follows the DfE guidance regarding teaching online safety in schools (2019) [Teaching online safety in schools](#)

Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below).

Youth produced sexual imagery (Sexting)

Harrodian will act in accordance with advice endorsed by DfE *Sexting in schools and colleges: responding to incidents and safeguarding young people* (UK Council for Child Internet Safety 2016) '[Sexting in school and colleges](#)'

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. Harrodian will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSLs as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is more or less serious enough to warrant a report to the DSLs. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSLs, which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a pupil (eg, mobile phone, tablet, digital camera), the member of staff will secure the device (it should be confiscated). This is consistent with DfE advice on searching, screening and confiscation: *advice for headmasters, school staff and governing bodies* (DfE January 2018), page 11 'After the search'. '[Searching, screening and confiscation](#)'

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to one of the DSLs (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to the young people involved as appropriate. Parents and carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to SPA and/or the police immediately.

The police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sexting will be referred to AfC's Single Point of Access for advice about whether or not a response by the police and/or children's social care is required.

This will facilitate consideration of whether:

- there are any offences that warrant a police investigation
- child protection procedures need to be invoked
- parents and carers require support in order to safeguard their children
- a referral to the Multi-Agency Risk and Vulnerability (MARVE) Panel is required
- any of the perpetrators and/or victims require additional support, this may require the initiation of an early help assessment and the offer of early help services

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- pressure applied to a number of students (eg, all female students in a class or year group) to create and share indecent images of themselves
- pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)

- what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident or whether the School is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will consult with the Police and the Single Point of Access to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a School device or network

If it is necessary to view the imagery then the DSL will:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Headmaster
- ensure viewing is undertaken by the DSL with delegated authority from the Headmaster
- ensure viewing takes place with another member of staff present in the room, ideally the Headmaster, another DSL or a member of the Senior Leadership Team. The other staff member does not need to view the images
- wherever possible ensure viewing takes place on School premises, ideally in the Headmaster's or DSL's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery

- record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents

Deletion of images

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

Bullying

Harrodian has an anti-bullying policy which is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms, eg, cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents on My Concern. All staff are aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied or victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headmaster and DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education. We have a duty to record and regularly report to the local authority incidents of recorded racism within the School.

So-called 'honour based' violence

So-called 'honour based' violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Crimes include female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Honour based violence might be committed against young people in our School who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to avoid an arranged marriage
- want to avoid a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others. Staff at Harrodian will record and report any concerns using My Concern about a child who might be at risk of HBV as with any other safeguarding concern. The DSL will consider the need to make a referral to the police, and/or the Single Point of Access as with any other child protection concern and may also contact the forced marriage unit for advice as necessary.

Female genital mutilation (FGM)

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so School staff are trained to be aware of risk indicators.

These risk indicators may include:

- pupil talking about getting ready for a special ceremony
- family taking a long trip abroad
- pupil's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Gambia, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan)
- knowledge that the pupil's sibling has undergone FGM
- pupil talks about going abroad to be 'cut' or to prepare for marriage

Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday period. Staff are aware that it is also possible for these procedures to be undertaken in the UK.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

(See [Female Genital Mutilation Statutory Guidance](#) and [Kingston and Richmond Safeguarding Children Partnership FGM Policy](#) for further information).

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern.

Signs that may indicate a pupil has undergone FGM:

- prolonged absence from School and other activities
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still and looking uncomfortable
- complaining about pain between the legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection

- disclosure

Teachers are subject to a statutory duty defined by Section 5B of the *Female Genital Mutilation Act 2003* (as inserted by section 74 of the Serious Crime Act 2015) to report to the police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting.

The mandatory reporting duty applies to all persons in Harrodian who are employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report to the police.

In Harrodian teachers in this situation will record their concerns using My Concern and inform the DSL, who will support the teacher in making a direct report to the police.

There are no circumstances in which a teacher or other member of staff will examine a girl.

Forced marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

For further information see: [Guidance forced marriage](#)

School staff will never attempt to intervene directly as a school or through a third party. Contact will be made with the Single Point of Access or the Forced Marriage Unit (020 7008 0151) for advice and support.

Child trafficking and modern slavery

Human trafficking, is defined in the UN Protocol on trafficking, adopted in 2000, as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern day slavery, as it is often referred to, is a crime and a safeguarding issue affecting millions across the world and in the United Kingdom.

Staff at Harrodian are alert to the existence of modern slavery and child trafficking and concerns will be recorded and reported to the Single Point of Access as appropriate.

Types of Modern Day Slavery

Examples of industries and services where slavery exist in the UK today, the victims of which include children and young people are (with examples):

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and child minding
- additionally, victims can be forced into criminal activities such as cannabis production, theft or begging

Modern day slavery is an issue that transcends age, gender and ethnicities. It can include victims that have been brought to the UK from overseas or vulnerable people in the UK being forced illegally to work against their will. Children and young people have an increased vulnerability to slavery.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions, and war are some of the situations that contribute to trafficking of victims and slavery.

Slavery can be linked to a number of safeguarding issues, including child sexual exploitation, but normally includes at least one of the following specific situations.

- Child trafficking: young people being moved internationally or domestically so that they can be exploited.
- Forced labour: victims are forced to work through physical or mental threat, against their will, often very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.
- Debt bondage: victims forced to work to pay off debts that they will never be able to. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an 'employer' or sold as a commodity.

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:

- physical appearance: poor physical condition, malnourishment, untreated injuries, and looking neglected
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community
- poor living conditions: victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address or premises

- personal belongings: few possessions, wearing the same clothes each day, and no identification documents
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport
- unusual travel times: victims may be dropped off or collected from work on a regular basis either very early or late at night
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have a lack of trust or concern about making a report through fear of deportation or fear of violence on their family

If a member of Harrodian staff suspects that a pupil may be a victim they will, in the first instance, report their concerns using My Concern and speak to one of the DSLs.

The DSL will seek advice and support from the Single Point of Access who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM).

Further advice can be provided directly by the modern slavery helpline on 0800 0121 700.

Private fostering

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Harrodian recognises that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When Harrodian becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify Children's Social Care themselves in the first instance, but also alert them to our mandatory duty as a School to inform the local authority of children in such arrangements.

[Looking after someone else's child](#)

Radicalisation and extremism

Protecting children from the risk of radicalisation is part of Harrodian's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse.

Section 26 of the *Counter-Terrorism and Security Act 2015* places a duty on education and other children's services ('specified authorities') to have 'due regard to the need to prevent people from being drawn into terrorism'.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The government defines extremism as vocal or active opposition to fundamental British values.

Harrodian seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to far right/neo Nazi/white supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist animal rights movements.

Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online. As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

Harrodian takes seriously our responsibility to ensure that children are safe from terrorist and extremist material when accessing the internet in School.

During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Harrodian is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. Harrodian promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within School.

Harrodian staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area, and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to My Concern immediately as they would any other safeguarding concern.

Harrodian recognises the importance of providing a safe space for children to discuss controversial issues and build the resilience and critical thinking skills needed in order to challenge extremist perspectives.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they will report this concern on My Concern and speak with one of the DSLs.

Harrodian will discuss any concerns about possible radicalisation identified in School with a pupil's parents and carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk. They will also support parents and carers who raise concerns about their children being vulnerable to radicalisation.

We will then follow normal safeguarding procedures, which may involve contacting the Single Point of Access for consultation and further advice and/or making appropriate referrals to the

police PREVENT team and Channel programme for any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

The Department of Education has also set up a dedicated telephone helpline for staff to raise concerns around Prevent (020 7340 7264).

We expect all staff, volunteers, visiting professionals, contractors and individuals or agencies that hire School premises to behave in accordance with the School's Code of Conduct for School staff. We will challenge the expression and/or promotion of extremist views and ideas by any adult on School premises or at School events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the following websites informative and useful:

[Protecting children from radicalisation: the prevent duty](#)

[Educate against hate](#)

Suicide and self-harm

Suicide: an act of deliberate self-harm which results in death.

Self-harm: self-poisoning or self-injury, irrespective of the apparent purpose of the act.

Suicide and self-harm links: self-harm is generally a way of coping with overwhelming emotional distress. Many young people self-harm where there is no suicidal intent. However, research shows that young people who self-harm can be at a higher risk of suicide.

Self-harm is a coping mechanism which enables a person to express difficult emotions. Young people who hurt themselves often feel that physical pain is easier to deal with than the emotional pain they are experiencing, because it is tangible. But the behaviour only provides temporary relief and fails to deal with the underlying issues that a young person is facing. For some people, self-harm may last for a short time. For others, it can become a long-term problem. Some people self-harm, stop for a while, and return to it months, even years, later, in times of distress.

Risk factors that indicate a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as: bereavement, bullying, cyber bullying, mental health problems including eating disorders, family problems such as domestic violence, any form of abuse or conflict between the child and parents.

The most common forms of self-harm are:

- cutting
- biting self
- burning, scalding, branding
- picking at skin, reopening old wounds
- breaking bones, punching
- hair pulling
- head banging
- ingesting objects or toxic substances
- overdosing with a medicine

Self-harm is usually a secretive behaviour but signs may include:

- wearing long sleeves at inappropriate times
- spending more time in the bathroom
- unexplained cuts or bruises, burns or other injuries
- unexplained smell of Dettol, TCP, etc
- low mood - seems to be depressed or unhappy, low self-esteem, feelings of worthlessness
- any mood changes - anger, sadness
- changes in eating or sleeping patterns
- losing friendships, spending more time by themselves and becoming more private or defensive
- withdrawal from activities that used to be enjoyed
- abuse of alcohol and or drugs

Harrodian recognises that any pupil who self-harms or expresses thoughts about self-harm and/or suicide, must be taken seriously and appropriate help and intervention will be offered at the earliest point. Any member of staff who is made aware that a pupil has self-harmed, or is contemplating self-harm or suicide will record on My Concern and report the matter to one of the DSLs as soon as possible as with any other safeguarding concern.

Fabricated or induced illnesses

Staff at Harrodian are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

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

The above three methods are not mutually exclusive. Existing diagnosed illness in a child does not exclude the possibility of induced illnesses. The very presence of an illness can act as a stimulus to the abnormal behaviour and also provide the parent with opportunities for inducing symptoms.

Fabricated or induced illness is most commonly identified in younger children. Although some of these children die, there are many that do not die as a result of having their illness fabricated or induced, but who suffer significant long term physical or psychological health consequences.

Fabrication of illness may not necessarily result in a child experiencing physical harm, but there may be concerns about the child suffering emotional harm. They may suffer emotional harm as a result of an abnormal relationship with their parent and/or disturbed family relationships.

Staff at Harrodian will record using My Concern and report any concerns about a child who might be experiencing fabricated or induced illness to one of the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral or consult with the Single Point of Access as with any other child protection concern.

Contextual Safeguarding

Harrodian recognises that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the Designated Safeguarding Leads will consider the context within which such incidents and/or behaviours occur and whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

[contextual safeguarding](#)

12. Children who may be particularly vulnerable

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including: prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability, mental and physical health needs and family circumstances.

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

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- asylum seekers
- looked after by the local authority or otherwise living away from home
- vulnerable to being bullied, or engaging in bullying behaviours
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- already viewed as a 'problem'
- at risk of child sexual exploitation (CSE)
- do not have English as a first language
- at risk of female genital mutilation (FGM)

- at risk of forced marriage
- at risk of being drawn into extremism

This list provides examples of vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

13. Children looked after and previously looked after

The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Harrodian will ensure that staff have the necessary skills and knowledge to keep children looked after, and previously looked after, safe. Appropriate staff will have the information they need in relation to a child looked after's legal status (for example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated) and the level of authority delegated by the caring authority to the carer.

The designated teacher for children looked after is Heather Locke.

The designated teacher will:

- promote a culture of high expectations and aspirations for how children looked after and previously looked after learn
- make sure the young person has a voice in setting learning targets
- be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning
- make sure that the children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home
- have lead responsibility for the development and implementation of all children looked after's personal education plans (PEPs) within the School

Role and responsibilities of the designated teacher

The designated teacher will ensure that the School has the up to date details of the allocated social worker/personal adviser (care leavers) and the virtual school Headteacher in the local authority that looks after the child. Details of the AfC Virtual School can be found at: [AfC Virtual School](#).

14. Early help and interagency working

At Harrodian we are prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to teenage years. In the first instance staff should discuss early help requirements with the appropriate DSL. Regular pastoral meetings are convened at least every

half term and provide all Heads of Year and other interested parties such as the School nurses and School counsellor to discuss children who may benefit from early help with the DSLs.

Any child may benefit from early help, but at Harrodian we are particularly aware of the potential need for early help for a child who:

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

Staff may be required to support other agencies and professionals in an Early Help Assessment (EHA). Early help assessment. This includes identifying emerging problems, liaising with the appropriate DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. If early help is appropriate the relevant DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help and or other support is appropriate the case will be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving. The DSLs are aware of the local escalation policy and procedures. We work closely with local professional agencies including social care, the police, health services and other services including voluntary organisations to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

As part of meeting a child's needs we recognise the importance of sharing information between professionals and local agencies. Fears about sharing information do not stand in the way of promoting the welfare and safety of children.

15. What to do if staff are concerned about a child's welfare

If staff have any concerns about a child's welfare, they should act on them immediately.

Any concerns regarding indicators of abuse or neglect or signs that a child may be experiencing a safeguarding issue should be recorded on My Concern and if the matter is considered to be urgent then the relevant DSL should be contacted as soon as possible.

If for any reason My Concern is not available, all details should be recorded on the "Record of Concern Form" (see Appendix 1) and passed to the relevant DSL. For physical signs of abuse, a body map can also be used (Appendix 3).

Concerns can also be discussed in person with the DSL but the details of the concern should be recorded in writing.

In an emergency any necessary action should be taken to help the child, for example, calling 999.

If it comes to attention **outside of school hours or outside of term time** that a pupil may be in immediate danger or is at risk of harm, the following procedures should be followed:

- The police should be called immediately on 999.
- Heather Locke should be contacted by mobile phone as soon as possible to inform her that this referral has been made. If she is unavailable a voice message should be left and a text sent. Her mobile number is 07957 168825.

There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

Harrodian recognises that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.

In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Staff should use My Concern to record these early concerns.

Following an initial conversation with the pupil, if the member of staff remains concerned they should discuss their concerns with the DSL and put them in writing.

If the pupil does begin to reveal that they are being harmed, staff should follow the advice below regarding a pupil making a disclosure.

16. What to do if a pupil discloses to a member of staff

We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if

they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with the pupil staff will:

- listen to what the child has to say and allow them to speak freely
- remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener
- reassure the child that it is not their fault and that they have done the right thing in telling someone
- not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk
- take what the child is disclosing seriously
- ask open questions and avoid asking leading questions
- avoid jumping to conclusions, speculation or make accusations
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused
- avoid admonishing the child for not disclosing sooner. Saying things such as ‘I do wish you had told me about it when it started’ may be the staff member’s way of being supportive, but may be interpreted by the child to mean they have done something wrong
- tell the child what will happen next

If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on. Staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible using “My Concern” in the child’s own words. The member of staff should then speak to the appropriate DSL as soon as possible.

17. Notifying parents

The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the Single Point of Access.

Where there are concerns about forced marriage or honour based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

18. Making a referral to the Single Point of Access (SPA)

Concerns about a pupil or a disclosure should be discussed with the appropriate DSL who will help decide whether a referral to the Single Point of Access is appropriate. If a referral is needed then the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the pupil.

If after a referral the pupil's situation does not appear to be improving the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the pupil's situation improves.

If a pupil is in immediate danger or is at risk of harm a referral should be made to SPA and/or the police immediately. Anybody can make a referral.

Where referrals are not made by the DSL, the appropriate DSL should be informed as soon as possible.

SPA contact number: 020 8547 5008.

19. Support for staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

20. Confidentiality

Harrodian recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the School must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and GDPR is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

The DfE emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or wellbeing. It is important that staff and volunteers tell the pupil in a manner

appropriate to the pupil's age and development that they cannot promise complete confidentiality and that they may need to pass information on to other professionals to help to keep the pupil or other children safe.

However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headmaster or DSLs will only disclose information about a pupil to other members of staff on a need to know basis.

We will always undertake to share our intention to refer a child to SPA with their parents and carers unless to do so could put the pupil at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with SPA on this point.

21. Record Keeping

Pupils' safeguarding and child protection records will be stored securely and access to them will be appropriately limited. All records are stored on My Concern. Where paper copies exist these are stored in a locked filing cabinet in Heather Locke's office. Only the DSLs have access to the key for this filing cabinet. These paper copies will be securely stored by the School until their 26th birthday is reached when they will be securely disposed of.

When pupils leave Harrodian the School will ensure that their child protection file is transferred to the new school or college as soon as possible. This will be transferred separately from their main pupil file, ensuring secure transit and a confirmation of receipt will be requested and retained. Where appropriate, the appropriate DSL will share information in advance of the pupil transferring so support can be put in place.

22. Procedure for dealing with complaints and allegations about staff

Despite all efforts to recruit safely there may be occasions when allegations of abuse against children are reported to have been committed by staff, practitioners and/or volunteers, who work with pupils in our School.

An allegation is any information which indicates that a member of staff or volunteer may have:

- behaved in a way that has, or may have, harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

This applies to any child the member of staff or volunteer has contact with in their personal, professional or community life, such as if they had child protection concerns raised for their own children.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, School's code of conduct and the

Guidance for safer working practice for adults who work with children and young people in education settings. Guidance for safer working practice

Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction.

All staff should be aware of Harrodian's behaviour policy.

All School staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headmaster or the lead DSL, Heather Locke.

The Headmaster, or lead DSL, on all such occasions will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation will immediately inform the Safeguarding Governor, Rachael Snaith, who will consult the LADO as above, without notifying the Headmaster first.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home
- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people

Harrodian will follow the London child protection procedures for managing allegations against staff, London child protection procedures: allegations, and procedures set out in Keeping Children Safe in Education 2019.

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the Headmaster will seek the advice of the LADO in making this decision. All options to avoid suspension will be considered. In the event of an allegation against the Headmaster, the decision to suspend will be made by the Safeguarding Governor in consultation with the LADO.

If an allegation pertains to an adult not employed directly by the School, for example, supply teachers, peripatetic teachers, sports coaches etc, the School will work directly with the employing agency if applicable and the LADO as described above.

Staff are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

23. Whistleblowing

Harrodian has a whistleblowing code (see Appendix 7). We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

Our School works hard to encourage a culture of mutual respect and learning. We welcome comments and feedback and provide staff, pupils and parents with a safe mechanism to raise any concerns.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the School's safeguarding arrangements.

In the first instance this should be raised with the Headmaster or the lead DSL, Heather Locke. If it becomes necessary to consult outside the School, they should speak to the LADO for further guidance and support.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 028 0285 or email: help@nspcc.org.uk

Whistleblowing issues regarding the Headteacher should be raised with the Safeguarding Governor, Rachael Snaith.

24. Physical intervention

Harrodian has a physical intervention and contact policy which is available as a separate document. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

All incidents involving physical intervention will be documented and recorded.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'safe practice' guidance to ensure they are clear about their professional boundaries.

25. Linked policies

Please list all relevant policies, such as:

- Behaviour
- Staff code of conduct
- Anti-bullying
- Health and safety and related risk assessments

- Allegations against staff and teacher misconduct
- Attendance and registration
- Curriculum
- Medical Policy
- Looked after children
- Drugs
- Sex and relationships education
- Physical intervention
- Online Safety
- Safer Recruitment

Appendix 1

Record of Concern Form

In the event that "My Concern" is unavailable for use, please use this form to record **any** concern about a child's welfare, if you suspect a child may be suffering abuse or neglect, you have received a disclosure from a child or you have received an allegation of neglect or abuse by other means. Once completed, give the form to the designated safeguarding person, **on the same day** and discuss with her at the earliest opportunity.

Use the following questions to help structure your concerns:

- What concerns do you have about the child? How was the child brought to your attention? When was the child brought to your attention?
- Have you spoken to the child? If so, what have they said? Try to use their words as much as possible.

Name of Pupil	Form
Teacher Concerned	Date
Comments	

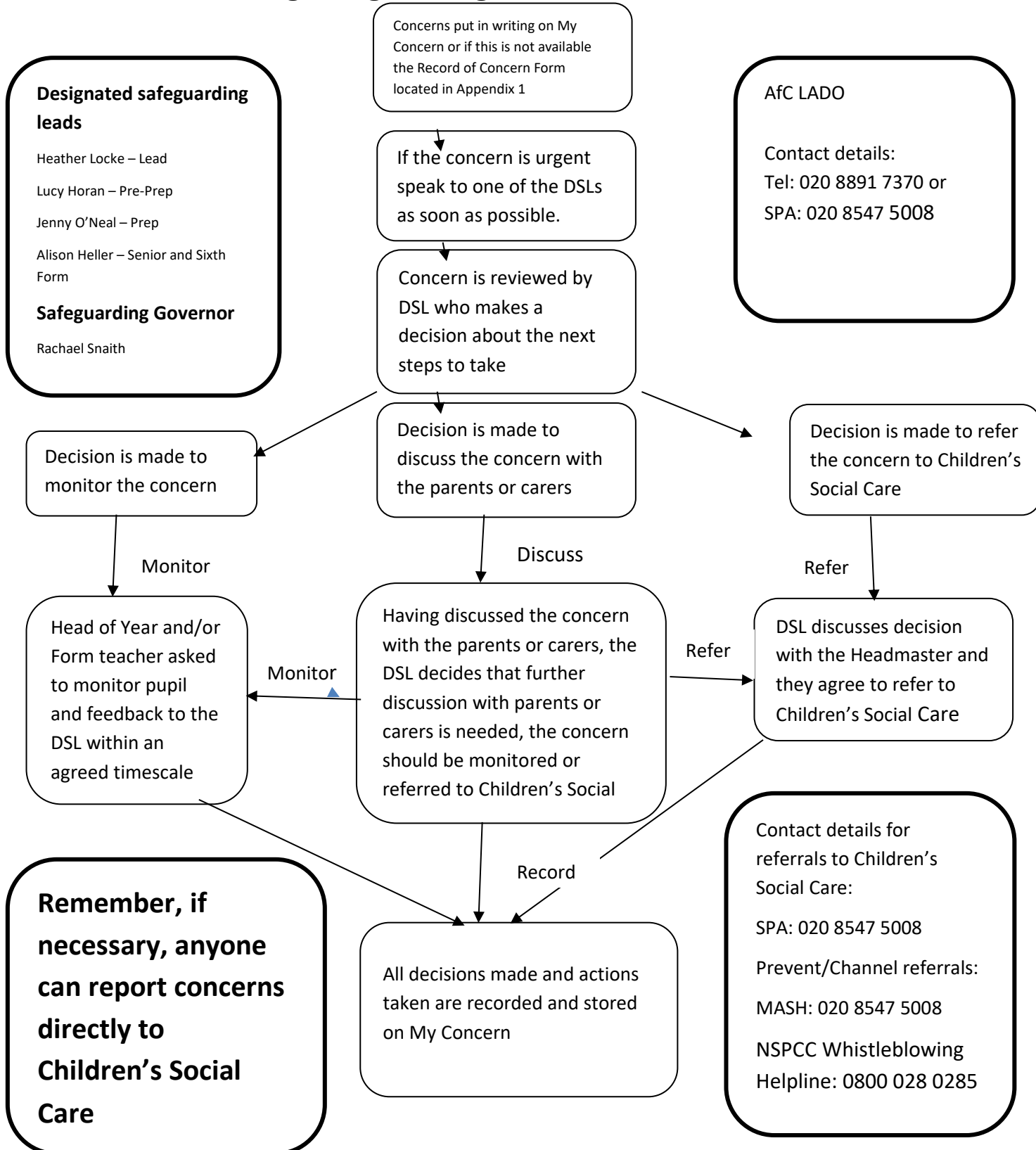
Have you spoken to anyone else about your concern?	Yes	No
If yes - Who?.....	When?.....	
Is this the first time you have been concerned about this child?	Yes	No
If No - please give details below:		

Signature

Hand this form to the designated safeguarding person before you go home. If the designated person is unavailable, hand it to a member of the Senior Leadership Team.

Concerns flow chart

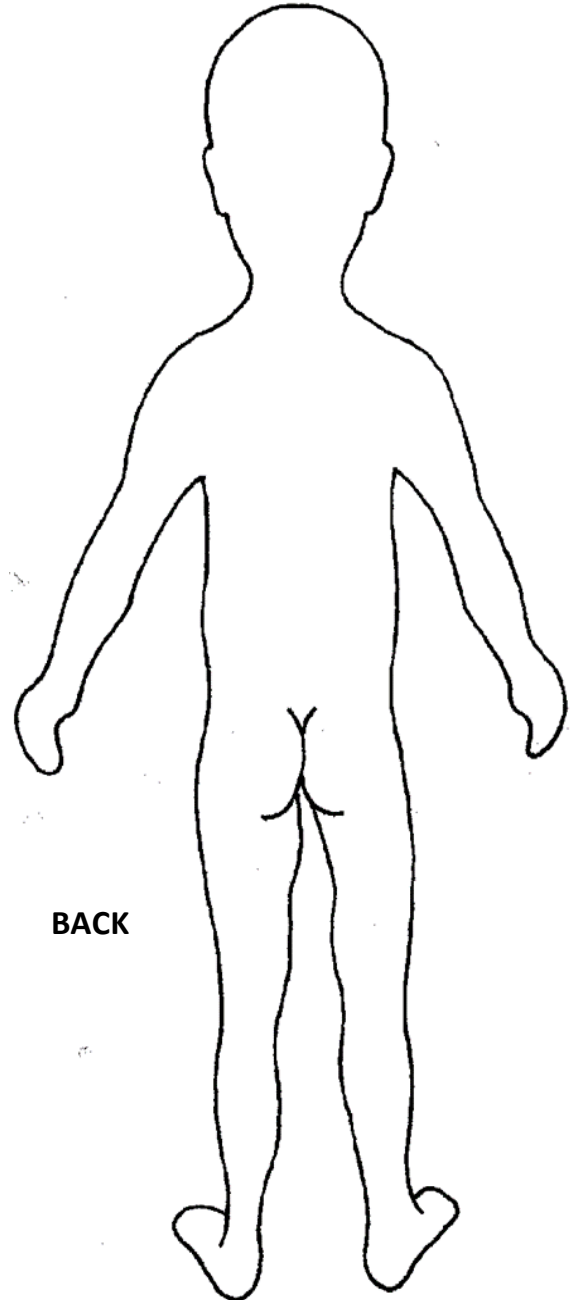
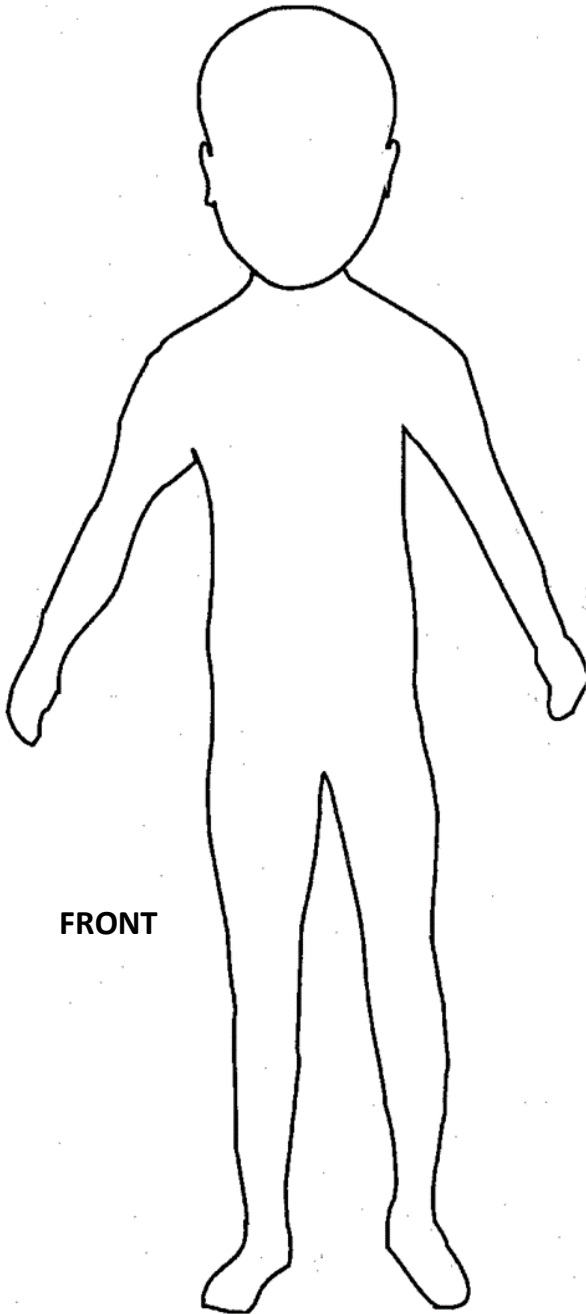
Raising safeguarding concerns about a child



Body map

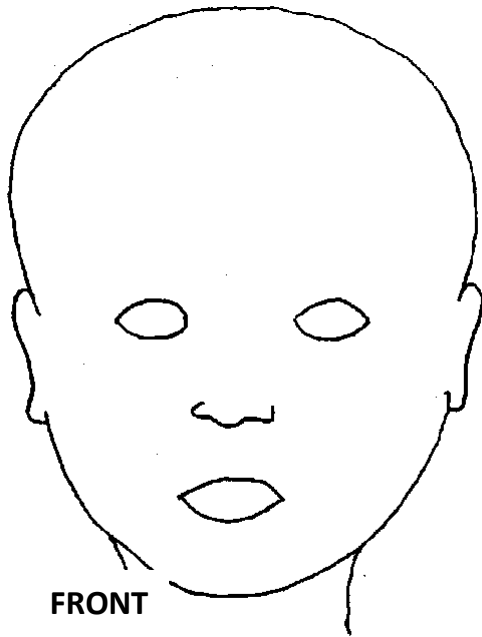
(This must be completed at time of observation)

Name of Pupil:		Date of Birth:	
Name of Staff:		Date and time of observation:	

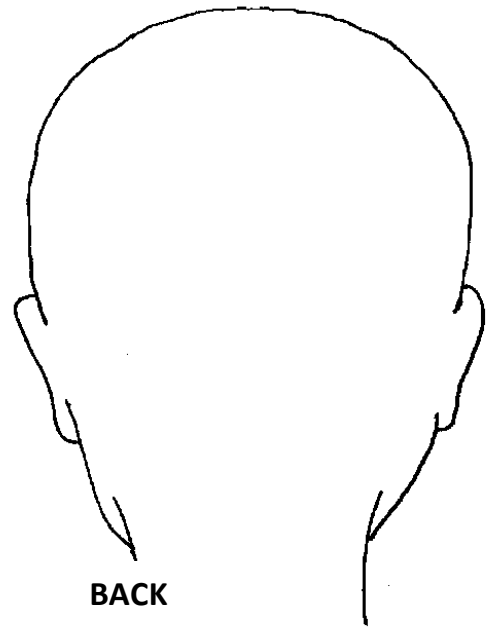


Signature: Date:

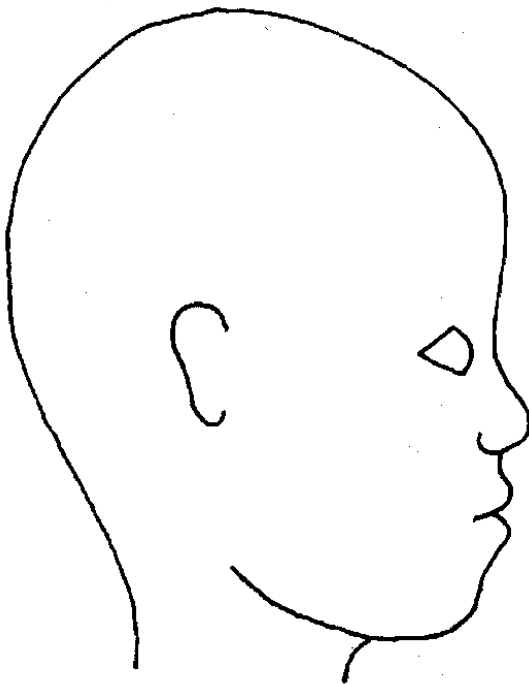
Name of Pupil:		Date of Birth:	
Name of Staff:		Date and time of observation:	



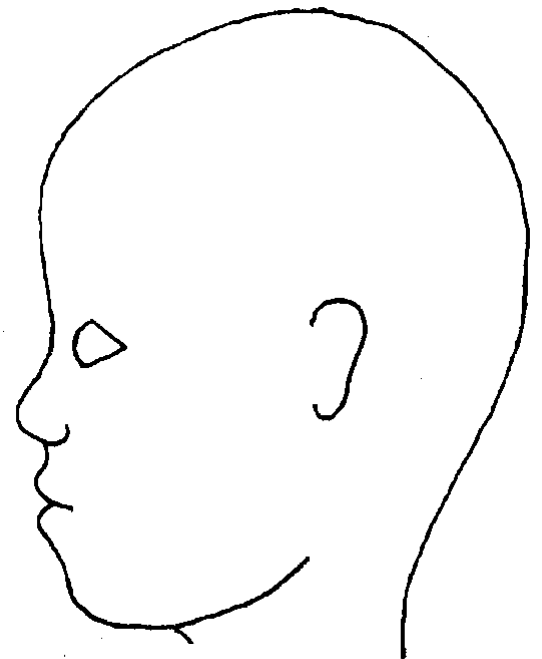
FRONT



BACK



RIGHT



LEFT

Date:

Signature:

Name of Pupil:		Date of Birth:	
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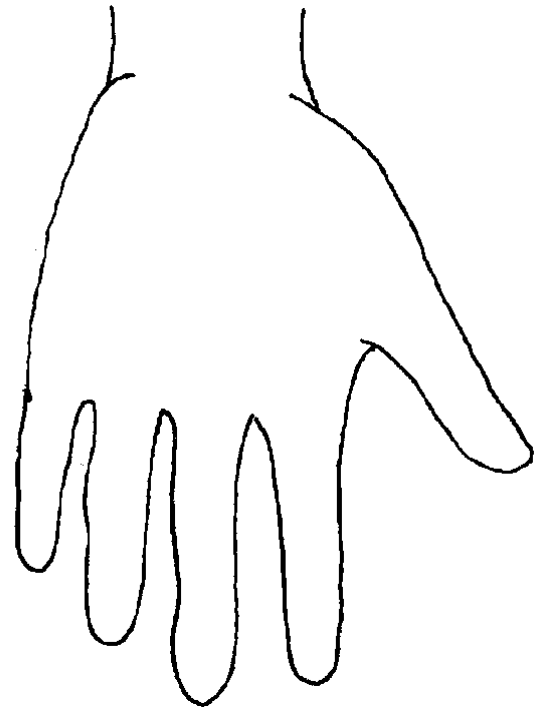
Name of Staff:		Date and time of observation:	
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RIGHT

LEFT

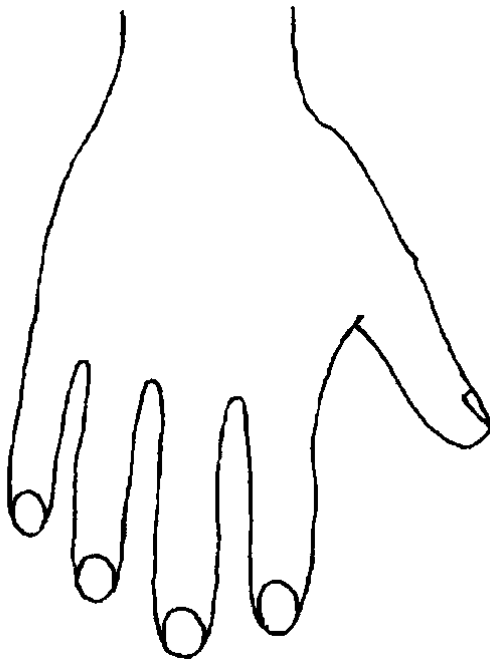


PALM

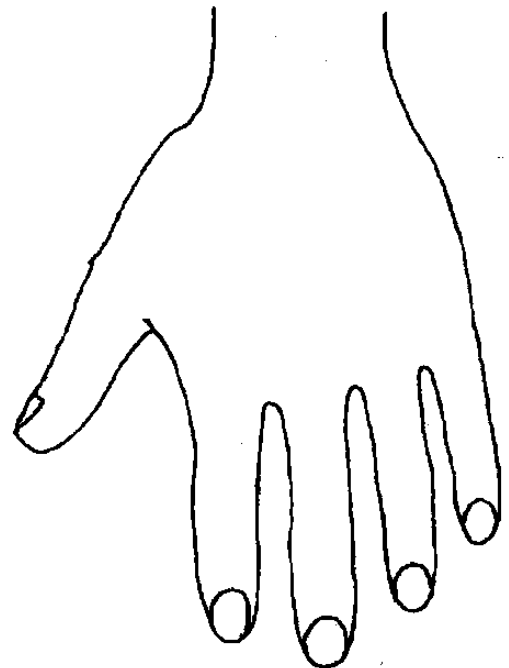


RIGHT

LEFT



BACK

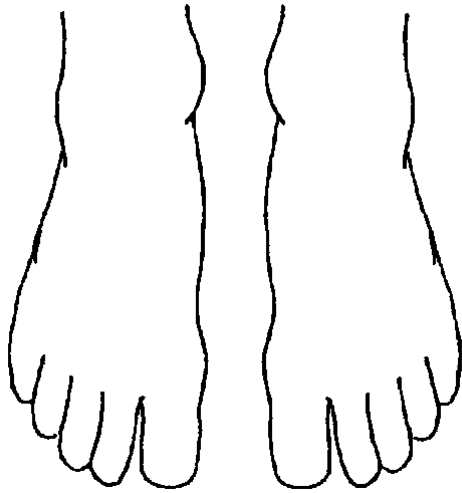


Signature: _____ Date: _____

Name of Pupil:		Date of Birth:	
----------------	--	----------------	--

Name of Staff:		Date and time of observation:	

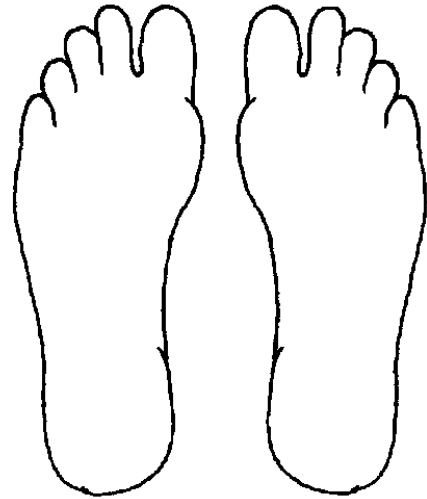
TOP



RIGHT

LEFT

BOTTOM



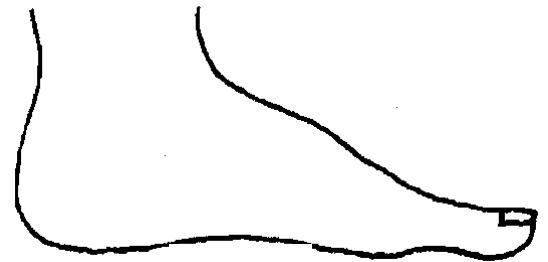
RIGHT

LEFT

INNER



RIGHT



LEFT

OUTER



Signature: _____ Date: _____

Links

Children Act 1989 Care Planning, Placement and Case Review:

www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review

Children Act 2004: www.legislation.gov.uk/ukpga/2004/31/contents

Education Act 2002: www.legislation.gov.uk/ukpga/2002/32/section/175

London Child Protection Procedures and Practice Guidance: www.londoncp.co.uk

Keeping Children Safe in Education 2019: www.gov.uk/government/publications/keeping-children-safe-in-education--2

Working Together to Safeguard Children 2018:

www.gov.uk/government/publications/working-together-to-safeguard-children--2

What to do if You're Worried a Child is Being Abused:

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

Information Sharing:

www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

Children Missing Education Statutory Guidance:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Safeguarding Children from Sexual Exploitation:

www.londoncp.co.uk/chapters/sg_sex_exploit_ch.html

Child Sexual Exploitation Definition and Guide: www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Sexting in School and Colleges:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Searching, Screening and Confiscation:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/554415/searching_screening_confiscation_advice_Sept_2016.pdf

Female Genital Mutilation Statutory Guidance: www.gov.uk/government/publications/multi-

Kingston and Richmond Safeguarding Children Partnership Female Genital Mutilation Policy: <https://kingstonandrichmondscb.org.uk/news-resources/policies-and-procedures-87/female-genital-mutilation-policy-203.php>

Guidance Forced Marriage: www.gov.uk/guidance/forced-marriage

Looking After Someone Else's Child: www.gov.uk/looking-after-someone-elses-child

Protecting Children from Radicalisation: The Prevent Duty: www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Educate Against Hate: [Educate against hate](http://Educate%20against%20hate)

Role and Responsibilities of the Designated Teacher: www.gov.uk/government/uploads/system/uploads/attachment_data/file/269764/role_and_responsibilities_of_the_designated_teacher_for_looked_after_children.pdf

AfC Virtual School: www.afcvirtualschool.org.uk

Early Help Assessment: www.achievingforchildren.org.uk/early-help-assessment

Guidance for Safer Working Practice: www.safeguardingschools.co.uk/wp-content/uploads/2015/10/Guidance-for-Safer-Working-Practices-2015-final1.pdf

London Child Protection Procedures: Allegations: www.londoncp.co.uk/chapters/alleg_staff.html

Contextual Safeguarding: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

Criminal Exploitation of Children and Vulnerable Adults: County Lines: <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Sexual Violence and Sexual Harassment: www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

Teaching Online Safety: <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Code of Conduct for School Staff

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 our pupils of all ages. To this extent, some of the points below have been proposed by our Senior Student Council, who are keen that staff adhere to a similar set of principles as we expect of them.

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 and colleagues, with consideration and respect
- recognise that differing social and cultural standards may mean that behaviour acceptable to some may be perceived as unacceptable or unreasonable to others
- 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 and that sexual relationships with a School pupil constitute an offence
- be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of harm
- encourage all children to reach their full potential
- never condone inappropriate behaviour by children or staff
- exercise good professional judgement as to the appropriateness of their conversations both within and outside of School
- 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
- refrain from giving personal contact details, such as phone numbers, private email or home addresses, to any child or parent, unless this has been approved by the School for situations such as sporting fixtures, school trips and tutoring
- refrain from making contact with, or allow contact from children or parents through social networking sites
- respect that much of what happens within our community should be considered private and should therefore not be discussed between colleagues nor outside the School community

Examples of Disrespectful Behaviour

Examples of inappropriate behaviour, as suggested by our Senior Student Council include, but are not limited to, the following:

- Use of threatening or abusive language, profanity or language that is intended to be, or is perceived by others to be demeaning, berating, rude, or offensive;
- Bullying, including conduct or mannerisms that are perceived by others to represent intimidation or harassment;
- Using conversational slurs that demonstrate racial, gender, sexual orientation, or cultural bias;
- Making or telling jokes that are reasonably perceived by others to be crude or offensive;
- Teasing, name calling, ridicule or making someone the brunt of pranks or practical jokes;
- Using sarcasm or cynicism directed as a personal attack on others.

Don't forget that private conversations between staff can be picked up inadvertently by pupils.

Appendix 6

Procedure to be followed in the event of an allegation of abuse against a member of staff or volunteer.

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 within the document: KCSIE 2019 part 4. The guidance must be followed when the Headmaster/Safeguarding Governor is dealing with the management of any allegations of abuse made against a member of staff or volunteer.

An allegation is any information which indicates that a member of staff/volunteer may have:

- behaved in a way that has, or may have harmed a child
- possibly committed a criminal offence against/related to a child
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they worked regularly or closely with children

This applies to any child the member of staff/volunteer has contact with in their personal, professional or community life, such as if they had child protection concerns raised for their own children.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, School code of conduct or government document '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*'.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Headmaster.

Where the allegation is not made directly to the Headmaster, the person to whom the disclosure is made must immediately inform the Headmaster. If it is the Headmaster against whom the allegation is made, the Safeguarding Governor should be notified immediately.

The Headmaster, or lead DSL, should report the matter to the relevant local SPA or the Local Authority Designated Officer (LADO) within 24 hours, who will offer any appropriate advice to the Headmaster and oversee the investigation, including strategy meetings.

Where the Strategy Discussion subsequently decides that a child protection enquiry should not be undertaken, this decision and any subsequent recommendations for other action will be recorded and reported back to the other parties concerned. The Strategy Discussion may decide to recommend that an internal investigation be carried out by the School or Education Service. If this internal investigation discovered other facts of a serious nature, it would always be possible to reconvene another Strategy Discussion. In appropriate circumstances, such cases might be referred to the Quality Assurance sub-group of the LSCB.

Where the Strategy Discussion decides that a child protection or criminal investigation should be pursued, this decision will be recorded and an action plan drawn up. The relevant Social Services locality team will then have full responsibility for pursuing and concluding the enquiry, co-ordinating with the Police Child Protection Team, medical personnel and other key workers. They will inform the School and all key workers involved of subsequent developments.

It is possible that the facts of a case may warrant an investigation of the member of staff concerned under the LA's disciplinary procedures. Such an investigation must not be conducted while any formal child protection enquiry or criminal investigation is being pursued.

If the Headmaster is the person against whom the allegation is made, then the initial report should be made to the Chairman not to the Headmaster. The Safeguarding Governor should also be informed. As before, a written and dated record should be made within 24 hours. The Chairman should take responsibility for contacting the Local Authority Designated Officer (LADO) at the SPA in either borough.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Headmaster will not investigate the allegation itself, or take written or detailed statements, but refer the concern to the Local Authority Designated Officer (LADO) at the relevant SPA.

Whistle-Blowing Code.

Purpose of the code

The School adheres to the local authority whistle-blowing policy and procedures that enable staff to raise concerns relating to:

- crime
- a miscarriage of justice
- illegality
- health and safety
- environmental or property damage
- unauthorised use of public funds
- concealing or attempting to cover up any of the above

This code provides additional information to help staff to understand the role of whistle-blowing in the context of poor practice and unacceptable conduct and attitudes towards children.

When to use the code

The whistle-blowing procedures and this code may be used by anyone employed by the School in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a child is inappropriate.

Inappropriate conduct includes, but is not confined to:

- bullying or humiliation
- contravening health and safety guidelines
- serious breaches of the School's code of ethical practice
- professional practice that falls short of normally accepted standards
- compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention

Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that children are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects children, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle-blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the School, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail children and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the child and the reputation of the whole School.

Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern that will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimisation, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable but you can be reassured that whistle-blowing procedures address these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistle-blowing. Your union, a solicitor or the local authority legal services can provide you with information about your legal position.

Confidentiality and anonymity

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The School would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The School will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistle-blowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

Reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the Headmaster.
- If the Headmaster is the subject of your concern, report this to the Chairman or Safeguarding Governor.
- A friend, colleague or union representative may accompany you to the meeting if you wish.
- Ensure the Headmaster, Chairman or Safeguarding Governor informs you of their proposed action and sets a date for a second meeting.

- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

Process and outcome

The Headmaster, Chairman or Safeguarding Governor will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.

Members of the School community may be asked to provide information or advice.

- External advice, for example, from legal or human resources or children's services may be sought.
- A written record of the conduct, established facts and outcome of the inquiry will be kept.
- The whistle-blower will be kept informed of the progress of the inquiry.
- The outcome of the inquiry will be one of the following:
 - No poor practice or wrongdoing is established and the case is closed.
 - The concern has some substance and the subject of the concern will receive advice and support from the Headmaster to improve practice.
 - Poor practice or wrongdoing is established and disciplinary proceedings are initiated.
 - The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved.

Further action

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact the governing body or local authority for advice.

Alternatively you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice.

Public Concern at Work
3rd Floor, Bank Chambers
6-10 Borough High Street
London SE1 9QQ

020 7404 6609
whistle@pcaw.co.uk
www.pcaw.co.uk

Appendix 8

Keeping Children Safe in Education 2019 Part 1 and Annex A Further information



Keeping children safe in education

**Statutory guidance for schools
and colleges**

**Part 1: Information for all school
and college staff**

Summary

Keeping Children Safe in Education is statutory guidance that schools and colleges in England must have regard to when carrying out their duties to safeguard and promote the welfare of children.

- Governing bodies of maintained schools (including maintained nursery schools) and colleges;
- Proprietors of independent schools (including academies, free schools and alternative provision academies) and non-maintained special schools. In the case of academies, free schools and alternative provision academies, the proprietor will be the academy trust; and
- Management committees of pupil referral units (PRUs)

are asked to ensure that **all staff** in their school or college **read** at least Part one of the guidance.

For ease of reference Part one is set out here as a stand-alone document.

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance [Working Together to Safeguard Children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - ☐ protecting children from maltreatment;
 - ☐ preventing impairment of children's 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.

5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

7. **All** staff have a responsibility to provide a safe environment in which children can learn.

8. **All** staff should be prepared to identify children who may benefit from early help.¹ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

9. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 35-47. Staff should expect to support social workers and other agencies following any referral.

10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.²

What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the;

- ☐ child protection policy;
- ☐ behaviour policy;³
- ☐ staff behaviour policy (sometimes called a code of conduct);
- ☐ safeguarding response to children who go missing from education; and
- ☐ role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child

¹ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

² The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012. ³ All schools are required to have a behaviour policy (full details are [here](#)). If a college chooses to have a behaviour policy it should be provided to staff as described above.

protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. **All** staff should be aware of their local early help⁴ process and understand their role in it.

16. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁵

17. **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

What school and college staff should look out for

Early help

18. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- ☐ is disabled and has specific additional needs;
- ☐ has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- ☐ is a young carer;
- ☐ is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- ☐ is frequently missing/goes missing from care or from home;
- ☐ is at risk of modern slavery, trafficking or exploitation;
- ☐ is at risk of being radicalised or exploited;
- ☐ is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- ☐ is misusing drugs or alcohol themselves;
- ☐ has returned home to their family from care; and
- ☐ is a privately fostered child.

⁴ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#). ⁵ More information on statutory assessments is included at paragraph 42. Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

Abuse and neglect

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

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

Indicators of abuse and neglect

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

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

23. **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 from 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.

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

clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 27).

25. **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, for example, 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.

Safeguarding issues

26. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Peer on peer abuse

27. **All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- ☐ bullying (including cyberbullying);
- ☐ physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- ☐ sexual violence,⁶ such as rape, assault by penetration and sexual assault;
- ☐ sexual harassment,⁷ such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

⁶ For further information about sexual violence see Annex A.

⁷ For further information about sexual harassment see Annex A.

- ☒ upskirting,⁸ which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- ☒ sexting (also known as youth produced sexual imagery); and
- ☒ initiation/hazing type violence and rituals.

28. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

Serious violence

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

30. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance⁹.

Female Genital Mutilation

31. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.¹⁰ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex A for further details.

Contextual safeguarding

32. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) 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

⁸ For further information about 'upskirting' see Annex A.

⁹ For further information about violent crime see Annex A.

¹⁰ Under Section 5B(11) (a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

Additional information and support

33. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

34. **Annex A** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

What school and college staff should do if they have concerns about a child

35. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

36. If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 15 for a flow chart setting out the process for staff when they have concerns about a child.

37. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

38. Options will then include:

- ☐ managing any support for the child internally via the school's or college's own pastoral support processes;
- ☐ an early help assessment;¹¹ or

¹¹ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

- ☒ a referral for statutory services,¹² for example as the child might be in need, is in need or suffering or likely to suffer harm.

39. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

40. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

Early help

41. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

¹² Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and

47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Statutory assessments

42. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

43. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children’s social care contact number.

What will the local authority do?

44. Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services;

- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

45. The referrer should follow up if this information is not forthcoming.

46. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

47. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

48. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

49. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹³ Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

¹³ An analysis of serious case reviews can be found at [Serious case reviews, 2011 to 2014](#).

What school and college staff should do if they have concerns about another staff member who may pose a risk of harm to children

50. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (Further details can be found in Part four of this guidance).

What school or college staff should do if they have concerns about safeguarding practices within the school or college

51. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.

52. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

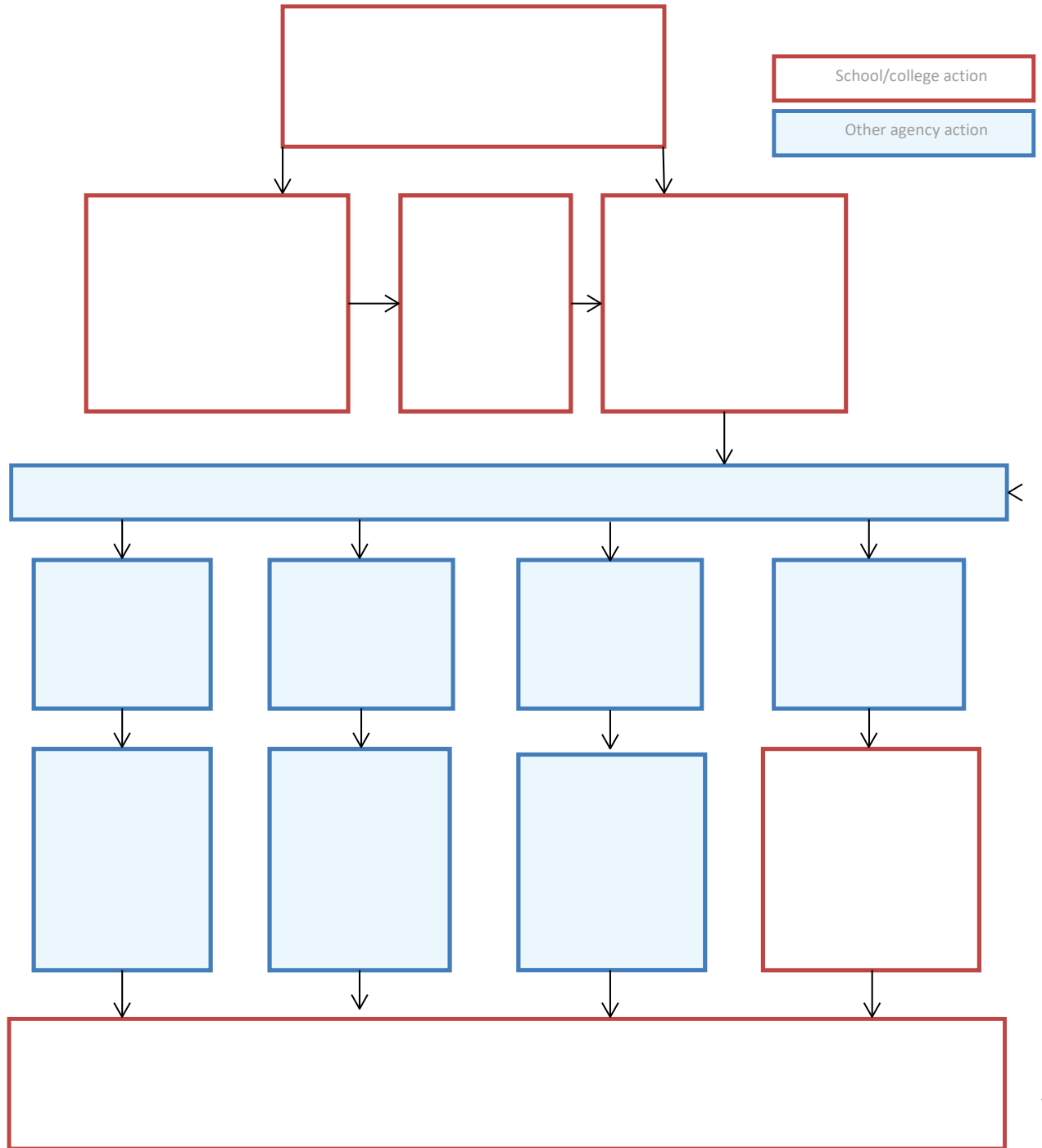
53. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.¹⁴

¹⁴ Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston

House, 42 Curtain, Road, London EC2A 3NH.

Actions where there are concerns about a child



School/college action
Other agency action

Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead (1)

Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help (2) and monitors locally

Referral (3) made if concerns escalate

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Within 1 working day, social worker makes decision about the type of response that is required

Child in need of
immediate protection:
referrer informed

Section 47 (4) enquiries
appropriate: referrer
informed

Section 17 (4) enquiries
appropriate: referrer
informed

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Appropriate emergency action taken by social worker, police or NSPCC (5)	Identify child at risk of significant harm (4): possible child protection plan	Identify child in need (4) and identify appropriate support	School/college considers past oral support and/or early help assessment (2) accessing universal services and other support

Staff should do everything they can to support social workers.

At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

- (1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early-help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).
- (5) This could include applying for an Emergency Protection Order (EPO).

Annex A: Further information

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from significant harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

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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](#).

The guides explain each step of the process, 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. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

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. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child sexual exploitation

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

- 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;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non- contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- 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);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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

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

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

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁵ should be

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

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

¹⁵ [national crime agency human-trafficking.](#)

- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or 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. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need

to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹⁶ that requires a different approach (see following section).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to 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. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁷ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (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) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

¹⁶ Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

¹⁷ Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some 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.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

[Extremism](#)¹⁸ is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. [Radicalisation](#)¹⁹ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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 the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard²⁰ to the need to prevent people from being drawn into terrorism”.²¹ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Additional support

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

[Educate Against Hate](#), a website launched by the Her Majesty’s Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The school’s or college’s designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

¹⁸ As defined in the Government’s Counter Extremism Strategy.

¹⁹ As defined in the Revised Prevent Duty Guidance for England and Wales.

²⁰ According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

²¹ "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Sexual violence and sexual harassment between children in schools and colleges

Context

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

What is sexual violence and sexual harassment? Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003²² as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the

penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?²³ Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.²⁴

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

- sexual "jokes" or taunting;

physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.²⁵ It may include:

- ☐ non-consensual sharing of sexual images and videos;
- ☐ sexualised online bullying;
- ☐ unwanted sexual comments and messages, including, on social media;
- ☐ sexual exploitation; coercion and threats; and
- ☐ upskirting.

²² [Legislation.gov.uk](https://www.legislation.gov.uk)

²³ It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped. More information: [here](#).²⁴ [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

²⁵ [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

²⁶ Additional information can be found at [GOV.UK](https://www.gov.uk).

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 36 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice

	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
“Honour Based Violence” (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: statutory guidance and government advice	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	MHCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy



Department
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