Safeguarding and Child Protection Policy and Procedures

Pembridge Hall School

Primary person responsible for implementation and monitoring of this policy	SLT level: Designated Safeguarding Lead Nicola Wright, Assistant Head Pastoral, 07890 068 015 Inspired Group level: Jez Prior, Global Head of Safeguarding. Jez.prior@inspirededu.com
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2 Key school contacts

Designated Safeguarding Lead (DSL)	Nicola Wright Email: nicola.wright@pembridgehall.co.uk Telephone number (term time): 020 7229 0121 Mobile number (term time): 07890 068 015 Holiday contact number: 07890 068 015
Deputy Designated Safeguarding Lead[s](DDSL)	Nicola Gray (nee Mooney) Email: nicola.mooney@pembridgehall.co.uk Telephone (term time): 020 7229 0121 Mobile number (term time): 07384 215 745 Holiday contact number: 07384 215 745
Head	Sophie Banks Email: sophie.banks@pembridgehall.co.uk Telephone number: 020 7229 0121 Mobile: 07816 198164
Governance	Inspired Education Group Ltd Governing Board | Girls School Notting Hill | Pembridge Hall Inspired Education Group Sixth floor, 3 Burlington Gardens, London, W1S 3EP. receptionLondonHO@inspirededu.com Inspired main office number: 020 3867 9961
Nominated Safeguarding Governor	Jez Prior Email: jez.prior@inspirededu.com Mobile number: 07831 568 013
Inspired Education Group UK CEO	Ashley Harrold Email: governors@inspirededu.com Phone: 020 3867 9961

3 Key external contacts

Designated Officer(s) of the local authority	**Safer Organisations Manager & Local Authority Designated Officer** Aqualma Daniel Telephone: 07870 481 712 Email Aqualma.Daniel@rbkc.gov.uk **Royal Borough of Kensington and Chelsea / City of Westminster LADO Manager** Sally Smith Telephone: 07967 764 794 Email: Sally.Smith@rbkc.gov.uk **Duty LADO for consultations and referrals** Kensington and Chelsea Telephone: 020 7361 3013 Email: KCLADO.Enquiries@rbkc.gov.uk Westminster Telephone: 020 7641 7668 Email: LADO@westminster.gov.uk
Kensington and Chelsea (RBKC) / Westminster children's social care department[1]	**RBKC Duty Line** Telephone: 020 7361 3013 (Out of hours: 020 7361 3013 **Westminster Access Team** Telephone: 020 7641 4000 Out of hours: 020 7641 6000 Email: accesstochildrensservices@westminster.gov.uk
Kensington & Chelsea / Westminster Safeguarding Children Partnership	Telephone: 07739 315388 Address: LSCP c/o 1st Floor (Purple Zone) Kensington Town Hall, Hornton Street, London W8 7NX
Bi-Borough Safeguarding Lead for Schools and Education	Elaine Campbell Telephone: 020 7361 3000

[1] If you think a child or young person is at risk or being abused or neglected, contact the children's social care team at their local council. If you do not know where they live, contact your local council's team, the NSPCC, or the Police for advice.

	Mobile: 07712 236 508 Email: elaine.campbell@rbkc.gov.uk
Child Exploitation Lead	RBKC: Sarah Stalker Working days: Monday - Thursday Telephone: 020 7598 4640 Mobile: 07971 322 482 Email: sarah.stalker@rbkc.gov.uk Westminster: Emily Harcombe Email: eharcombe@westminster.gov.uk
CNWL Named Professional for safeguarding children	Joanna Payne, CNWL Named Professional for Safeguarding Children for Adult Mental Health Services Email: joanna.payne@nhs.net Abigail Skeel. CNWL Named Professional for Safeguarding Children, Child and Adolescent Mental Health Services and Eating Disorders. Email: abigail.skeel1@nhs.net
Named Nurse for safeguarding children	RBKC: Catherine Hunter Mobile: 07876 313 939 Email: catherinehunter4@nhs.net Westminster: Emelia Bulley Mobile: 07867185726 Email: ebulley@nhs.net
Police	Emergency telephone number: 999 Non-emergency telephone number: 101
NSPCC FGM helpline	0800 028 3550 fgm.help@nspcc.org.uk

FGM reporting – non-emergency police contact number	Emergency telephone number: 999 Non-emergency telephone number: 101 (use this number to report suspected FGM)
Prevent partners and advice about extremism	Prevent team RBKC: Email: prevent@lbhf.gov.uk Telephone: 020 8753 5727 Prevent team Westminster: Email: prevent@westminster.gov.uk Telephone: 0781 705 4699 or 0779 098 0223 **Non-emergency DfE advice** 020 7340 7264 counter-extremism@education.gsi.gov.uk **NSPCC advice** 0808 800 5000 help@nspcc.org.uk
UK Safer Internet Centre Online Safety Helpline	0344 381 4772 (10am – 4pm) helpline@saferinternet.org.uk
NSPCC whistleblowing advice helpline	Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Safecall Whistleblowing Platform	Contact Us - Safecall Ltd
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk
Disclosure and Barring Service (DBS)	**Helpline**: 0300 020 0190 **Barring referrals**: Online referral service
OP Encompass helpline	The helpline is available from 8:00 to 13:00, Monday to Friday on 0204 513 9990
School's Nursing Team	Central and North West London Foundation Trust (CNWL) Telephone: 020 3317 4460

	Email: cnw-tr.kandcshs.cnwl@nhs.net

4 Child Focused Approach to Safeguarding

All our staff will maintain an attitude of 'it could happen here' where safeguarding is concerned.

- Pembridge Hall School recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is **everybody's responsibility** and everyone has a role to play in keeping children safe. This includes staff, volunteers, governors, leaders, parents/carers, wider family networks and pupils.

- As a school we recognise the important role we can all play in identifying concerns early and, where appropriate, making referrals for children needing Family Help or statutory intervention.

- Pembridge Hall School believes that the best interests of children always come first. All children, defined in law and in this policy as anyone under the age of 18, have a right to be heard, protected and supported. This policy applies to all children, including those living with birth parents or extended family, children in kinship care, adopted children, looked after children, previously looked after children and care leavers. Where safeguarding concerns relate to pregnancy, staff will also consider the help, support and protection needs of unborn children.

- All children have equal rights to protection, regardless of age, sex, ability, culture, race, language, religion, belief, sexual orientation or identity. Pembridge Hall School is committed to creating and maintaining an inclusive, anti-discriminatory safeguarding culture. Staff are expected to recognise and challenge racism, discrimination and prejudice, and to consider how these experiences may affect children's safety, welfare and access to support.

- Staff at Pembridge Hall School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child. If any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

- This policy applies to child protection concerns relating to children who attend school. It may also apply to other children connected to the [school], such as siblings, children on student or work placements, or members of staff who are under the age of 18.

- Pembridge Hall School recognises the importance of providing an ethos and environment where children are safe and feel safe. Children will be respected, listened to and encouraged to talk openly. Their wishes and feelings will be taken into account when deciding what safeguarding action to take and what support to provide.

- Pembridge Hall School recognises that children's behaviour, presentation and experiences should be understood in context. Staff will take a trauma-informed and child-centred approach, considering the possible root causes of behaviour and the impact of abuse, neglect, exploitation, discrimination, adversity and wider contextual or extra-familial harm.

- All our staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should

be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Our core safeguarding principles are:

- **Prevention:** providing a positive, supportive and safe culture, curriculum and pastoral opportunities for children, alongside safer recruitment procedures.
- **Protection:** following agreed procedures and ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns
- **Support:** adopting a child-centred approach and providing appropriate support for pupils, parents/carers and staff, including specific interventions for those who may be at risk of harm.
- **Collaboration:** Always working with parents/carers, unless it could place the child at additional risk, when managing safeguarding concerns internally through our own pastoral processes or when making referrals to other agencies as appropriate, to ensure timely, proportionate and effective safeguarding action is taken.

5 Aims

5.1 This is the safeguarding and child protection policy and procedures of Pembridge Hall School

5.2 The aims of this policy are as follows:

5.2.1 to actively promote the well-being of pupils[2];

5.2.2 to safeguard and promote the welfare of children[3], staff and others who come into contact with the school and to protect them from harm;

5.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;

5.2.4 to raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature;

5.2.5 to raise staff awareness about the school's safeguarding expectations;

5.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

5.2.7 to ensure consistent good safeguarding practice throughout the school, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it;

5.2.8 to promote a whole school culture of safety, equality, and protection; and

5.2.9 to ensure the school works together effectively with parents, local authorities, partner organisations and agencies.

5.3 Every pupil should feel safe and protected from any form of abuse and neglect.

5.4 All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the school community are set out in this policy.

5.5 Members of the School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

5.6 Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.

5.7 This policy forms part of the school's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the school to ensure

[2] This wording reflects the requirements in part 8 paragraph 34 of the ISSR. Well-being means well-being within the meaning of section 10(2) of the Children Act 2004(a): the physical and mental health and emotional well-being; protection from harm and neglect; education training and recreation; contribution made by pupils to society; social and economic well-being.
[3] This wording reflects the requirements in part 3 paragraph 7 of ISSR.

that the best interests of pupils underpin and is at the heart of all decisions, systems, processes, and policies.

5.8 Our whole school approach means we will involve everyone in the school or college and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

5.9 Pembridge Hall School will promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

6 Scope and application

6.1 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

6.2 This policy applies at all times including where pupils or staff are away from the school, whether they are on school-arranged activities or otherwise, and whether or not the school is open. It will therefore apply out of School hours and in the holidays.

6.3 This policy applies to core School activities and to out of hours and commercial activities run by the school. Where a third party is using the premises, the school will ensure that there is a written agreement in place confirming they have adequate safeguarding procedures. If the School receives an allegation relating to an incident that happened when a third party was using the premises, the school will follow this policy in the normal manner, to include informing the LADO.

6.4 This policy is designed to address the specific statutory obligations on the school to safeguard and promote the welfare of children.

6.5 A child is someone who has not yet reached their 18th birthday, but in practice this policy applies to all young people studying or living within Inspired Education Group accommodation.

7 Regulatory framework

7.1 **This policy has been prepared to meet the school's responsibilities under the following legislation:**

7.1.1 The Education (Independent School Standards) Regulations 2014;

7.1.2 Statutory framework for the Early Years Foundation Stage for group and school-based providers (DfE, From 1 September 2025) here;

7.1.3 Education Act 2002;

7.1.4 Education and Skills Act 2008;

7.1.5 Children Act 1989;

7.1.6 Children Act 2004;

7.1.7 Childcare Act 2006;

7.1.8 Safeguarding Vulnerable Groups Act 2006;

7.1.9 Children and Social Work Act 2017;

7.1.10 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**);

7.1.11 The Data (Use and Access) Act 2025

7.1.12 Human Rights Act 1998; and

7.1.13 Equality Act 2010.

7.2 **This policy has regard to the following guidance and advice**:

7.2.1 **Statutory guidance:**

a) Keeping children safe in education (DfE, September 2026) (**KCSIE**);

b) Working together to safeguard children 2026: a guide to multi-agency working to help, protect and promote the welfare of children (HM Government, updated March 2026) (**WTSC**);

c) Disqualification under the Childcare Act 2006 (DfE, August 2018);

d) Revised Prevent duty guidance for England and Wales (HM Government, Dec 2023);

e) Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

f) Children missing education (DfE, September 2025);

g) Relationships education, relationships and sex education and health education guidance (DfE, July 2025);

h) Channel duty guidance: Protecting people susceptible to radicalisation (HM Government, April 2025);

i) Code C PACE Regarding police searches of pupils on school premises and presence of an appropriate adult.

j) Working together to improve school attendance (DfE, July 2026).

k) Use of reasonable force and other restrictive interventions guidance (April 2026)

7.2.2 **Non-statutory advice**:

a) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

b) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents, and carers (HM Government, May 2024);

c) Meeting digital and technology standards in education (DfE, June 2026);

d) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024)

e) Searching, screening and confiscation: advice for schools (DfE, July 2023);

f) Teaching online safety in schools (DfE, January 2023);

g) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, August 2025);

h) Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);

i) Harmful online challenges and online hoaxes (DfE, February 2021);

j) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme);

k) Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);

l) Forced marriage resource pack (Home Office, May 2023);

m) Educate Against Hate (DfE updated monthly);

n) Managing risk of radicalisation in your education setting (DfE, Updated 7 September 2023);

o) Keeping children safe in out-of-school settings (DfE, August 2025);

p) Mobile phones in schools - Guidance February 2024

q) Behaviour in schools guidance June 2026,

r) When to call the police Guidance for schools and colleges from National Police Chiefs Council

s) Equality Act 2010 and schools (DfE, May 2014)

t) United Nations Convention on the Rights of the Child (UNCRC)

7.3 Kensington and Chelsea / Westminster Safeguarding Children Partnership's referral / threshold procedures / guidance

7.4 The following School policies, procedures and resource materials are relevant to this policy:

7.4.1 Staff Conduct policy;

7.4.2 Global Staff Code of Conduct (Inspired Education Group policy)

7.4.3 Behaviour and Discipline policy;

7.4.4 Anti-bullying policy, which includes cyber-bullying;

7.4.5 Acceptable Use Policy for Staff;

7.4.6 Acceptable Use Policy for Pupils;

7.4.7 Attendance Policy & Procedures;

7.4.8 Behaviour Policy (including physical intervention and positive handling);

7.4.9 Looked-After Children and Previously Looked-After Children Policy;

7.4.10 Complaints Policy;

7.4.11 Equality Information and Objectives Statement;

5.4.1 Data Protection Policy;

7.4.12 Health and Safety policy;

7.4.13 Supporting Pupils with Medical Conditions Policy;

7.4.14 Online Safety Policy;

7.4.15 Social media Policy;

7.4.16 Whistleblowing Policy;

7.4.17 Recruitment policy;

7.4.18 Risk Assessment policy

7.4.19 Special Educational Needs and Disability (SEND) policy;

7.4.20 Missing and Uncollected Child policy;

7.4.21 Special Educational Needs and Disability (SEND) policy;

7.4.22 External Visitors policy;

7.4.23 Attendance policy;

7.4.24 PSHE and RSE policy; and

7.4.25 Mental Health and Wellbeing policy.

8 Inspired policy of Mandatory Reporting

1) Staff members should be vigilant and maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

2) Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

8.1 **Mandatory Reporting**

All staff have a duty to:

1) report any concerns they may have about the safety and / or well-being of pupils;

2) report any concerns they may have about the safety and / or well-being of other persons associated with the school;

3) report any safeguarding concerns about staff or anyone else associated with the school; and

4) follow up on any such reports to ensure that appropriate action is or has been taken.

5) The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the school's local authority or that local to the child's home address) or police in their absence for guidance.

6) Where a member of staff has concerns that a child may be at risk of harm or abuse ***at home, at school or anywhere else, then the member of staff MUST report those concerns to the schools Designated Safeguarding Lead, and / or the headteacher, as per the guidance below.***

7) Where a staff member has concerns that the designated safeguarding lead or headteacher is not listening to concerns or not taking action to safeguard a child, the member of staff must contact the Global Head of Safeguarding.

8) The member of staff can also use the SafeCall whistleblowing platform HERE to raise concerns.

9) Where a member of staff has concerns about the behaviour of another member of staff that indicates they may pose a risk to a child or indicates that person may not be suitable to work with children, the member of staff MUST report those concerns immediately to the headteacher.

10) Where the concerns relate to the headteacher the member of staff must contact the Global Head of Safeguarding.

8.2 **Failing to report concerns – can be considered as gross misconduct**

Failure to report concerns as outline in 7 above can be considered as gross misconduct.

9 Publication and availability

9.1 This policy is published on the school website and a hard copy is available on request.

9.2 A copy of the policy is available for inspection from the school office during the school day.

9.3 This policy can be made available in large print or another accessible format if required.

9.4 This policy and all policies referred to in it are also available to staff on the School SharePoint.

10 Definitions

10.1 Where the following words or phrases are used in this policy:

10.1.1 References to Governors, means Governors identified on the school website.

10.1.2 References to the Inspired Education **Group** means the proprietor.

10.1.3 References to **working days** mean Monday to Friday, even if the school is open on Saturdays, when the school is open during term time. The dates of terms are published on the school's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;

10.1.4 **Safeguarding** is the protection of people from harm.

10.1.5 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:

- Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. 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;
- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

10.1.6 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the school is located and, where appropriate, the team based in the local authority where the child is resident.

10.1.7 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

10.1.8 **Local Authority Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.

10.1.9 **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Boards (ICBs) and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to the school can be found in Appendix 5.

10.1.10 References to harmful sexual behaviour in this policy refer to problematic, abusive, harassment and violent sexual behaviour that is developmentally inappropriate and may cause developmental damage.

10.1.11 Reference to **staff** includes all those who work for or on behalf of the school, regardless of their employment status, including part-time staff, contractors, supply staff, volunteers and Governors unless otherwise indicated.

10.1.12 **Senior Leadership Team** (SLT) compromises of the Head, Deputy Head, Assistant Head Academic (Curriculum and Future Schools), Assistant Head Academic (Progress & Achievement) and Assistant Head Pastoral (DSL).

11 Responsibility: The school's approach to safeguarding leadership

11.1 Governance

11.1.1 Inspired Education Group has overall responsibility for all matters which are the subject of this policy, including:

a) Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to relevant guidance issued by the Secretary of State;

b) Strategic leadership responsibility for the school's safeguarding arrangements;

c) Act in accordance with the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the UK General Data Protection Regulation (UK GDPR) which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure;

d) Act in accordance with Chapter 4, WTSC which places obligations on organisations to promote the welfare of children and protect them from harm;

e) Specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE;

f) Establishing appropriate delegation arrangements at School level, led by the Head and DSL, to enable the school to discharge its safeguarding duties effectively; and

g) Alternative Provision

h) The governors understand that where we as a school place a pupil with an alternative provision provider, our school continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs, that the alternative provision has all relevant safer recruitment in place which has been confirmed in writing, and the alternative provision complies with all safeguarding requirements of KCSIE and WTSC.

i) Our school will always confirm where any of our pupils are based during school hours.

j) This will include having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements frequently (at least half termly) to provide assurance that the child is regularly attending, and the placement continues

to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

11.1.2 The contact details of Pembridge Hall School's Governors can be found on the school website.

11.1.3 **The Inspired Education Group:**

a) Ensures that all Governors receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

b) Ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have; and

c) Ensures that appropriate arrangements are in place for the whole governing board to discharge its function, including appropriate consideration of safeguarding matters at governing board meetings and a holistic annual review of safeguarding.

11.1.4 **Inspired Education Group UK has appointed** a Nominated Safeguarding Governor whose contact details are set out in the school contacts list at the front of this policy.

11.1.5 The Nominated Safeguarding Governor receives advanced safeguarding training, which is regularly updated. Governors receive regular updates as required and through a monthly Board report on safeguarding;

11.1.6 Safeguarding and the implementation of policies and procedures is monitored at the school through an annual cycle of governance visits. In every governors meeting the governors will review:

a) Safeguarding Training;

b) Child protection issues and concerns raised since the last governors meeting

c) Incidents of bullying;

d) Online safety incidents

e) that school has appropriate filtering and monitoring systems in place and ensure that a review of their effectiveness is carried out at least once every academic year.

f) Feedback from pupil forums or surveys on matters relating to well-being and safeguarding;

g) Response to any safeguarding allegation against a member of staff, including peri, agency, sports coaches, and volunteers.

h) The effectiveness of multi-agency working; and

i) Lessons learned.

11.1.7 The Nominated Safeguarding Governor hosts regular forums for DSLs and Deputy DSLs across the Inspired Education Group, which explore safeguarding issues and updates.

11.1.8 The Nominated Safeguarding Governor ensures safeguarding policies and procedures are kept up to date with the law and best practice, including a formal annual review, with the DSL, which may be shared with the local authority under section 157 and 175 of the Education Act 2002

11.2 Head

11.2.1 The Head is responsible for the overall management of the school, including safeguarding, and specifically for the management of concerns and allegations about staff.

11.2.2 The Head ensures that the school's policies and procedures, adopted by the school governors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.[4]

11.3 Designated Safeguarding Lead (DSL)

11.3.1 The DSL is a senior member of staff of the school's leadership team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety, understanding the filtering, and monitoring systems and processes in place) throughout the school.

11.3.2 The DSL has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the school contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex **B** of KCSIE.

11.3.3 The DSL will also liaise with the Head to inform them of issues relating to any police[5] investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements, and welfare of juveniles to whom the provisions of PACE Code C[6] and any other code of practice apply.

11.3.4 The DSL will have a clear understanding of KCSIE and be able to provide advice and guidance to other staff on the content.

12 The DSL will carry out their role in line with Annex B of KCSIE 2026.

This includes, but is not limited to:

12.1 managing referrals to the Front Door Service, the police, the Channel programme, the Disclosure and Barring Service and other agencies as required.

[4] Paragraph 120 KCSIE 2026
[5] When to call police – Guidance for schools.
[6] PACE Code C - appropriate adult police searching pupils.

12.2 working with others, including the headteacher, senior leaders, relevant staff, social workers, early help services, Family Help workers, local authority services and other safeguarding partners.

12.3 acting as a source of support, advice and expertise for all staff.

12.4 maintaining a confidential recording system for safeguarding and child protection concerns.

12.5 coordinating safeguarding action for individual children, including children who need a social worker, children receiving early help, children who are looked after or previously looked after, and children subject to child protection or child in need plans.

12.6 ensuring the school contributes to multi-agency safeguarding arrangements and is appropriately represented at relevant safeguarding meetings.

12.7 ensuring locally established procedures are followed as necessary.

12.8 promoting educational outcomes by sharing relevant welfare, safeguarding and child protection information with teachers and school leadership staff, where appropriate.

12.9 taking lead responsibility for online safety, including understanding filtering and monitoring systems and processes.

12.10 ensuring staff access appropriate safeguarding and child protection training, including online safety, and receive regular safeguarding updates.

12.11 keeping the headteacher informed of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

12.12 being aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning.

12.13 ensuring child protection files are kept up to date, stored securely.

12.14 Ensuring records are transferred appropriately where children leave the school. The designated safeguarding lead (or a deputy) will ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives.

12.15 The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.

12.16 Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCOs) or the named persons with oversight for special educational needs and disabilities (SEND) in a school, are aware as required. It will then be for the designated safeguarding lead to consider what other information should be shared with other relevant staff and when appropriate to do so.

12.17 In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours.

12.18 Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it we will ensure the receiving school are aware so they can assess risk, and accordingly, put in place a safety and support plan for when the child arrives.

12.19 We recognise it is good practice for a conversation to take place between the designated safeguarding leads at both settings, where there are issues or concerns.

12.20 The DSL will also ensure the school works with safeguarding partners in accordance with Chapter 1 of WTSC, and specifically:

a) children's welfare is paramount,

b) children's wishes and feelings are sought, heard, responded to and recognised as being central to decision-making,

c) children's social care works in partnership with whole families,

d) children are raised by their families, with their family networks or in family environments wherever possible,

e) local authorities work with other agencies to effectively identify and meet the needs of children, young people, and families,

f) local authorities consider the economic and social circumstances impacting children, young people, and families and actively seek to address discrimination and inequality experienced by families,

g) a child-centred approach within a whole family focus,

h) a collaborative approach to give parents and carers the best chance of making changes,

i) recognising principles for working with parents and carers,

j) identifying and engaging with parents and carers that have been unwilling or unable to engage with other services,

k) identifying and addressing discrimination and inequality experienced by families, understanding the expectations for multi-agency working, and

l) understanding the principles of information sharing.

12.21 The DSL will act in accordance with the National multi-agency standards for child protection, (Chapter 3, Section 3 of WTSC) including:

a) an unrelenting focus on multi-agency protection against all forms of significant harm, both inside and outside the home, including online and on achieving the best outcomes for children and families,
b) creating learning cultures in which information is shared between practitioners, who prioritise staying up to date as new evidence of best practice emerges,
c) ensuring practices are underpinned by a shared multi-agency vision, structure and practice framework that builds trust, understanding and clarity about roles and responsibilities across agencies,
d) facilitating timely, effective information sharing and expert input through attendance and participation of suitably experienced practitioners from the outset of concerns about significant harm,
e) creating an anti-discriminatory environment in which it is safe to challenge, including assumptions that relate to ethnicity, sex, disability, and sexuality,
f) supporting practitioners with effective individual and group supervision and facilitating multi-agency supervision and continuous professional development, and
g) helping practitioners to understand the impact of their decisions on the child and family.

12.22 The Governors and DSL will have a clear understanding of WTSC 2026, Chapter 3, Section 1 Early Help, Section 2, Safeguarding and promoting the welfare of children and Section 3, Child protection.

12.23 The Governors and DSL will also have a clear understanding of Chapter 4 of WTSC; Individual Organisational Responsibilities, for schools, colleges and other education providers, and specifically guidance contained in WTSC and KCSIE.

12.24 The DSL will take lead responsibility for pupils who are looked after children.

12.25 The DSL will also undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff.

12.26 If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL, who is trained to the same level as the DSL. The Deputy DSL's details are also set out in the school contacts list at the front of this policy.

13 Additional Considerations for EYFS settings

13.1 The Early years foundation stage statutory framework 2026 requires all settings to have a lead practitioner for safeguarding. In our setting and in this policy, the lead practitioner in our setting is the Designated Safeguarding Lead (Nicola Wright)

13.2 As an EYFS, all staff will be familiar with Section 3 of the EYFS framework and understand that we must:

13.2.1 Safeguard children.

13.2.2 Ensure the people who have contact with children are suitable

13.2.3 Promote good health.

13.2.4 Support and understand behaviour, and be curious regarding what factors, both within the setting and outside, may be influencing behaviour.

13.2.5 Maintain records, policies, and procedures.

13.3 Safeguarding Concerns

13.3.1 Any member of staff within our EYFS setting who has a concern about a child or member of staff shall follow this policy.

13.4 Mobile phone / camera and other electronic devices with imaging, videoing, and sharing capabilities.

13.4.1 No member of staff will use their own mobile phone or device at any time to take photographs, videos, or any other type of recording, of children attending the setting.

13.4.2 Only school owned devices will be used to take images of the children and only when they are engaged in activities related to the setting.

13.4.3 Any member of staff taking images on a setting owned device will be reminded that they may only take images of children where there is prior consent from parent / carers.

13.4.4 School devices used for taking images/videos will be stored securely and periodically checked by SLT for content. Images of children will only be shared / held on school owned accounts.

13.4.5 See 27 below for mobile device policy for parents.

13.5 Paediatric First Aid.

13.5.1 At least one member of staff who is paediatric first aid trained will be present and available at all times on the premises. At least one member of staff who is paediatric first aid trained will always accompany children on outings.

14 Specific safeguarding duties in relation to children

14.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

a) All staff have an important role in safeguarding and promoting the welfare of children. They are particularly well placed to observe changes in a child's behaviour, appearance, attendance or wellbeing, identify concerns early, provide help for children and prevent concerns from escalating.

14.2 All members of staff have a responsibility to:

a) provide a safe environment in which children can learn.

b) be aware of the systems within the school which support safeguarding, including this child protection policy, the [staff code of conduct, the safeguarding response to children who are absent from education, and the role of the DSL.

c) be aware of the indicators of abuse, neglect and exploitation, so they can identify children who may need help or protection.

d) be prepared to identify children who may benefit from support before statutory intervention, including universal services, community-based Early Help, targeted early help through Family Help, and/or statutory support from children's social care, in line with Kensington and Chelsea/ Westminster local procedures.

e) understand the local process for seeking advice and making referrals, including Requests for Support to the Front Door Service, and for statutory assessments under the Children Act 1989, in line with RBKC/Westminster LSCP guidance. This includes where a child may be in need, disabled, or suffering, or likely to suffer, significant harm.

f) know what to do if a child tells them they are being abused, neglected or exploited, and understand the impact this can have on a child.

g) maintain an attitude of professional curiosity and speak to the DSL if they have any concerns about a child.

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

i) know how to maintain an appropriate level of confidentiality, while understanding that early sharing of information is vital to keeping children safe.

j) reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

k) undertake safeguarding and child protection training, including online safety, and engage with regular safeguarding updates.

l) act in line with the staff code of conduct and other relevant safeguarding policies.

m) where applicable, act in line with the Teachers' Standards, which state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession.

14.3 Staff should speak with their DSL if they need clarification or further training about any of the contents or procedures outlined in this policy.

14.4 The school is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The school requires everyone who comes into contact with children and their families to share this commitment.

14.5 All staff should have an awareness of **safeguarding issues** that can put children at risk of harm and confirm that they have read Part 1 of KCSIE 2026. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

14.5.1 The school will:

a) understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the RBKC/Westminster Safeguarding Children Partnership, the key details of which are contained in Appendix 5;

b) be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;

c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

d) promote the systems in place for children to confidently report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

e) take active steps to promote school attendance:

f) allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff code of conduct;

g) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

h) design and operate procedures which, so far as possible, ensure that staff, pupils, and others who are innocent are not prejudiced by malicious, false, unsubstantiated, or unfounded allegations;

i) prepare staff to identify and support children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;

(a) be alert to children who are at potentially greater risk of harm (both online and offline), including children who have an appointed social worker and children requiring mental health support;

j) be alert to the needs of pupils with physical or mental health conditions, special educational needs, or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;

k) encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the school to protect them[7];

l) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol, and substance misuse;

m) assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

n) identify pupils who may be susceptible to extremist ideology and radicalisation and know what to do when they are identified;

[7] See Appendix 3 – 1.7

o) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the school or in the local area. See Appendix 5 - Local arrangements for more details; and

p) consider the additional factors relevant to safeguarding boarders e.g. inappropriate pupil relationships, the potential child-on-child abuse and the risks associated with children sharing overnight accommodation.

14.6 Staff may follow the school's whistleblowing policy, including using the SafeCall[8] platform, to raise concerns about poor or unsafe safeguarding practices at the school or potential failures by the school or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the School's Local Authority if they consider that the school has failed to deal with concerns appropriately.

15 Reporting obligations of staff

15.1 Reporting obligations generally

15.1.1 Staff members should be vigilant and maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

15.1.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

15.1.3 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

15.1.4 All staff have a duty to:

a) report any concerns they may have about the safety and / or well-being of pupils;

b) report any concerns they may have about the safety and / or well-being of other persons associated with the school;

c) report any safeguarding concerns about staff or anyone else associated with the school; and

[8] Contact Us - Safecall Ltd

d) follow up on any such reports to ensure that appropriate action is or has been taken.

15.1.5 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the school's local authority or that local to the child's home address) or police in their absence for guidance.

15.2 What to do if staff have a concern about a pupil's welfare

15.2.1 If staff have ***any*** **concern about a pupil's welfare**, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

a) The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;

b) See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 30 below relating to recording a concern.

15.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

15.2.3 Teachers must report known cases of female genital mutilation (**FGM**) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

15.2.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

15.2.5 **What if the DSL is unavailable?**

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

b) Generally, the designated safeguarding lead (or a deputy) will be available in person, however in exceptional circumstances, this may mean being available on the phone, via Microsoft Teams etc.

c) We will ensure that there is DSL or Deputy DSL cover arrangements in place for any out-of-hour/out of term activities.

d) We will ensure continuity of safeguarding responsibilities and implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances.

e) If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

f) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately[9]. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 15 below for further details on making a referral.

g) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

15.3 Action by the DSL

15.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Children Partnership's procedures and referral threshold document. Such action may include:

a) managing any support for the pupil internally via the school's own pastoral support processes, seeking advice from children's social care where required (see 16, 17 & 18 below);

a) undertaking an early help assessment (which generally requires parental consent) (see 17 below); or

b) making a referral for statutory services (see 18 below).

15.3.2 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

15.3.3 Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

15.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

16 Managing support for pupils internally

16.1 The school has a framework for the identification, assessment, management, and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified.[10]

16.2 The school will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

17 Universal Services, Community Based Early help and Family Help

17.1 Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents,

[9] The criteria regarding the involvement of the police are a context-driven judgment-call, but if the safety of the child is in any doubt, or it is believed that a crime has been committed, the police should be called. If the child requires urgent medical attention an ambulance should be called to take the child to hospital. Further guidance can be found here When to call the police

[10] This should include the approach to protecting children where there is a significant gender imbalance in the school (which is a particular requirement for boarding schools - see standard 8.4 of the NMS).

children, or whole families. Targeted Family Help is coordinated through the local authority to address specific concerns within the family. .

17.2 The DSL will be familiar with local early help and family help services and will be able to signpost and refer children and families as appropriate.

17.3 The school's safeguarding training includes guidance about community based early help and family help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:

17.3.1 is disabled or has certain health conditions and has specific additional needs;

17.3.2 has special educational needs (whether or not they have a statutory Education, Health and Care plan, (EHCP));

17.3.3 has poor attendance at school,

17.3.4 has a mental health need;

17.3.5 is a young carer;

17.3.6 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

17.3.7 is frequently missing / goes missing from care or from home;

17.3.8 is at risk of modern slavery, trafficking sexual or criminal exploitation;

17.3.9 is at risk of being radicalised or exploited;

17.3.10 has a family member or carer in prison, or is affected by parental offending;

17.3.11 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

17.3.12 is misusing alcohol or other drugs themselves;

17.3.13 is looked after or has returned home to their family from care;

17.3.14 is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;

17.3.15 is a privately fostered child;

17.3.16 is persistently absent from education including persistent absences for part of the school day; and

17.3.17 has experienced multiple suspensions and is at risk of being permanently excluded.

17.4 A member of staff who considers that a pupil may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL (see Section 30 'record keeping' below and appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the Local Safeguarding Children Partnership menu of early help services and their referral threshold document and will

support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

17.5 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, School staff may be required to take a lead role.

17.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

18 Making a referral.

a) Pembridge Hall School recognises the pivotal role education settings play in multi-agency safeguarding arrangements. We are committed to working in line with London's Safeguarding Children Multi-Agency Partnership procedures,

b) The Pembridge Hall School leadership team, governing body and DSL(s) will work to establish effective and co-operative relationships with safeguarding partners and other local agencies. This may include Children's Front Door, social workers, Family Help practitioners, health professionals, mental health services, specialist teachers, educational psychologists, other education settings and the police.

c) Pembridge Hall School will work with partner agencies to provide a coordinated safeguarding response which promotes children's welfare and protects them from harm. This includes contributing to relevant multi-agency plans and meetings, such as child in need meetings, child protection conferences, core groups, strategy discussions and care planning meetings.

18.1 **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.**

18.2 "Harm" is the "ill treatment or impairment of the health or development" of a child.[11] Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

18.3 The contact details for the School's CSC team are set out at the front of this policy. [Staff should bear in mind that referrals may be required to the School's CSC team where the school is located and/or the pupil's home address CSC team]

18.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding children partner will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC. Children's social care | Westminster City Council Kensington and Chelsea Social Services Line | Royal Borough of Kensington and Chelsea

[11] Section 31 Children Act 1989

18.5 Statutory assessments

18.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

a) **Children in need:** *A child in need is 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.* Children in need may be assessed under section 17 of the Children Act 1989.

b) **Children suffering or likely to suffer significant harm:** Local authorities 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.*

18.6 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 27 of KCSIE, and the flowcharts set out in Chapter 3 Section 3 of WTSC for information about the likely actions and decisions required.

18.7 Parental consent is not required for referrals to statutory agencies, but Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

18.7.1 personal details of the child including the child's developmental needs;

18.7.2 detailed information about the concern;

18.7.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

18.8 If the referral is made by telephone, this should be followed up in writing.

18.9 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

18.10 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

18.11 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves, in accordance with the procedures set out in Appendix 5.

19 Allegations against pupils - child on child abuse

19.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour[12] is alleged to have occurred, the DSL

[12]This is defined by the DfE as sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person, or adult. Staff might refer to the Brook Traffic Light Tool where unsure about what behaviours are developmentally appropriate but where any doubt exists should raise a concern with the appropriate person under this policy.

will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

19.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services, as necessary.

20 Extra-familial harm

20.1 Safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside the school, inside and outside of home and online.

20.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

20.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

20.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence and county lines and radicalisation.

21 Risk assessment.

21.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

21.2 The format of risk assessment may vary and may be included as part of the school's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare, and education plans, as appropriate). Regardless of the form used, the school's approach to promoting pupil welfare will be systematic and pupil focused.

21.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored, and evaluated.

21.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained and tasked with, carrying out the particular assessment.

22 What to do if staff have a safeguarding concern about someone else's welfare.

22.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

22.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

23 Allegations made and or/concerns raised about staff and others in School.

23.1 The school has a policy and procedures for managing allegations made and/or concerns raised about any adult working for, or on behalf of, the school, whether paid or unpaid, or any Other Adult (as defined in Appendix 4) which may affect the safety and welfare of children.

23.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The policy and procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

23.3 The school will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

23.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the school in relation to contact with pupils, parents, colleagues, and any other person who comes into contact with the school. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.]

24 Informing parents

24.1 The parents of the alleged victim of any behaviours from staff members will normally be kept informed, as appropriate, of any action taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents. In all cases the school will follow the advice of the statutory safeguarding partners when dealing with such matters.

24.2 In all cases, the DSL will be guided by the London Safeguarding Children Partnership's referral threshold document.

24.3 Schools must have regard to advice provided by the statutory safeguarding partners for details about the disclosure of information where an allegation has been made against a member of staff, before any information relating to that staff member or action to be taken under these procedures is communicated to parents.

25 Additional reporting

25.1 In addition to the reporting requirements explained above, the school will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

25.1.1 **Health and Safety Executive**

a) The school is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy for further details about this.

25.1.2 **Disclosure and Barring Service** (**DBS**)

a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4 for further details.

25.1.3 **Teaching Regulation Agency** (**TRA**)

a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he / she had not resigned. See Appendix 4 for more details.

25.1.4 **Ofsted**

a) The school will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision registered with Ofsted (whether that allegation relates to harm or abuse committed on the premises or elsewhere, or any other reportable incident), and will provide details of the action taken in respect of those allegations and incidents. See Appendix 4.

25.1.5 **Insurers**

a) The school will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

b) Care should be taken to ensure this is done before renewal to ensure that the school complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

26 Safer recruitment and supervision of staff

26.1 The school is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate recruitment policy.

26.2 The school maintains a single central register of appointments for all staff.

26.3 The school recognises that all safer recruitment checks are undertaken for anyone in regulated activity. We recognise that any volunteer assisting in school now falls under the definition of regulated activity and will be subject to the same safer recruitment checks.

26.4 We recognise that if an individual working at a school is self-employed, we will ither obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

26.5 Staff connected to the school's early years and later years provisions are under an ongoing duty to inform the school if their circumstances changed which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the

School's Safer recruitment policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the school.

26.6 Staff Taking Medication / under the influence of alcohol (EYFS specific)

a) Staff members must not be under the influence of alcohol or any other substance which may affect their ability to care for children. If a practitioner is taking medication which may affect their ability to care for children, they should seek medical advice. Practitioners must only work directly with children if the medical advice received confirms that the medication is unlikely to impair that person's ability to look after children properly. All medication on the premises must be stored securely, and out of the reach of children at all times.

21.2 DBS Checks

We will not permit volunteers to begin working within the settings covered by the EYFS framework until the school or nursery school has received the volunteer's enhanced DBS certificate including barred list information.

21.3 **Visitors**

a) Our school may receive a wide range of visitors, these include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers.

b) We may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days.

c) We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

d) We will however ensure that children's relatives and other visitors are supervised during sports day and other similar performances.

e) Where a parent, prospective parent or family member attends the school for either a meeting or for site tour etc, they will be escorted at all times whilst on the school site.

f) For visitors who are there in a professional capacity, school will check ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks. Schools should not ask to see the certificate in these circumstances).

g) Where a visitor will have no contact with children, it is unlikely that a DBS check will be required, however they will be supervised if on site and the school is open, or there are children on site.

h) Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools enrich children's education, careful consideration should be given to the suitability of any external organisations.

i) We will always assess education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required for any external organisation.

22 Use of mobile technology

22.1 The school's policy on the use of mobile technology, including phones and cameras, in the school, is as follows:

a) No pupils in our school will have access to a mobile phone during the school day.

b) The school's Mobile Phones and Devices policy sets out the expectations on pupils from Reception to Year 6. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;

c) the approach to harmful online content and how pupils' devices are managed in terms of bringing a device into the school are set out in the School's Acceptable use policy;

d) all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff mobile and electronic device policy and staff code of conduct;

e) parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

22.2 The school allows to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

22.3 The school's approach to online safety is set out in the School's Online Safety Policy, which covers the four key areas, including AI:

(a) Content

(b) Contact

(c) Conduct, and

(d) Commerce

22.4 The school also has an acceptable Use Policy for Pupils.

23 Training

23.1 The school ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

23.2 The level and frequency of training depends on the role of the individual member of staff.

23.3 The school maintains written records of all staff training.

23.4 All training will be carried out in accordance with London Safeguarding Children Partnership's procedures where possible.

23.5 Induction

a) All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

a) this policy;

b) the role, identity and contact details of the DSL and her Deputy;

c) the Behaviour and Discipline policy for pupils;

d) the Anti-bullying Policy, which includes details of the school's policy on cyberbullying and prejudice-based and discriminatory bullying;

e) the staff code of conduct including the whistleblowing policy, social media policy and acceptable use policy;

f) the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods;

g) the school's approach to online safety which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring;

h) safeguarding training in accordance with London Safeguarding Children Partnership's procedures including guidance on managing a report of child-on-child harmful sexual behaviour;

i) a copy of Part 1 of KCSIE and, where appropriate, Annex A of KCSIE (for school leaders and those working directly with children); and

j) appropriate Prevent duty training.

23.6 Safeguarding training

a) Staff not working directly with children will receive a copy of this policy and Part 1of KCSIE and will be required to confirm that they have read and understand these;

b) School leaders and all staff working directly with children will receive a copy of this policy and Part 1 of KCSIE and will be required to confirm that they have read and understand these via an annual affirmation statement.

c) Members of the SLT (including the Head) and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all of KCSIE.

d) All staff members (including the Head) will undertake appropriate safeguarding training which will be updated every year and following consultation with the RBKC/Westminster Safeguarding Children Partnership's local arrangements and this policy. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via staff meetings on a regular basis and at least annually.

e) Staff development training will also include training on online safety which should, amongst other things, include an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes

in place in the school, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the school.

f) Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child on child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

g) All Governors receive safeguarding training (including online safety) on induction. This training will equip with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

h) The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

i) The school has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills, and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews]. This includes information on how staff can report concerns occurring out of hours / out of term time.

23.7 **Designated Safeguarding Lead** (**DSL**)

a) The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.

b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex B of KCSIE.

c) Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (DfE updated monthly) for further details.

23.8 Teaching pupils about safeguarding

a) We recognise our school plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

b) Our school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

c) Such a programme should be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other vulnerabilities).

d) This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships,
- healthy and respectful relationships,
- boundaries, consent and kindness in relationships,
- stereotyping, prejudice and equality,
- body confidence and self-esteem,
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

e) The school recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

f) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The school utilises many different opportunities to teach pupils about safeguarding, as outlined below:

- PSHE lessons
- Relationship Education (as part of PSHE)
- Form time
- NSPCC 'Stay Safe' Assemblies i.e. bullying, internet safety, managing friendships
- Curriculum lessons i.e. Computing and online bullying

g) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe online and when accessing remote learning. The Inspired Education Group has ensured appropriate filters and monitoring systems are in place at the school and meet the DfE's filtering and monitoring standards (see the online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

h) The school keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

24 Monitoring and review

24.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with Inspired Education Group as necessary the Nominated Safeguarding Governor and seeking contributions from staff. The DSL will update the Senior Management Team and the Governing Board regularly on the operation of the school's safeguarding arrangements.

24.2 Any safeguarding incidents at the school will be followed by a review of these procedures by the DSL and a report made to the Inspired Education Group, through the Nominated Safeguarding Governor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the school's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

24.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

24.4 The governors will also undertake an annual review of this policy and the school's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks its pupils face.

24.5 The DSL will work with the Nominated Safeguarding Governor to prepare an annual safeguarding self-assessment.

25 Record keeping.

25.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing within the school's child protection recording systems. This will also help if/when responding to any complaints about the way a case has been handled by the school. Information should be kept confidential to those who need to know and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

a) a clear and comprehensive summary of the concern;

b) details of how the concern was followed up and resolved; including the reasons behind deciding whether to refer a concern was to the local authority or not, and

c) a note of any action taken, decisions reached, and the person who is responsible for both the decision and the actions.

d) The outcome – including a summary, which is to be included in any chronology.

25.2 The information created in connection with this policy may contain personal data. The school's use of this personal data will be in accordance with data protection law. The school has published on its website privacy notices which explain how the school will use personal data.

25.3 All records created in accordance with this policy are managed in accordance with the school's policies that apply to the retention and destruction of records.

25.4 Insofar as pupil records are concerned:

a) Staff must record all concerns about a pupil on the school's child protection recording systems. Guidance on record keeping is set out in Appendix 2.

b) The DSL will open a child protection file following a report to him / her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

25.5 Information sharing and multi-agency working[13]

a) As a school we recognise sharing information is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes.

b) Schools have clear powers to share, hold and use information for these purposes [14][15][16].

c) As a school we will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

d) When deciding what information to share, we will consider:

(a) the relevancy of the information, including to the current safeguarding risk,

(b) what is necessary for the receiving setting to know, and

(c) whether it is clearly presented and appropriately contextualised.

e) We will use professional judgement to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

f) Where relevant, we will take advice from Local Authority child protection services helplines to assist in deciding if, when and what information to share.

g) The school will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The school will always act in order to safeguard and promote the welfare of others.

h) The school understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including

[13] For further information, see Information sharing: advice for practitioners providing safeguarding services (July 2018), which contains a myth-busting guide to information sharing.
[14] Chapter 1 2026 Working together to safeguard children 2026
[15] DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers
[16] Sharing information to safeguard children and young people in the education sector in the UK | ICO

their educational outcomes. Fears about sharing information will not be stand in the way of the need to promote the welfare and protect the safety of pupils, which is always the school's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 ,and the Data (Use and Access) Act 2025 provide a framework to ensure that personal information is shared appropriately.

i) When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the school will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. The school will also have regard to its data protection policies. Inspired Education Group's Data Protection Officer will work with the DSL and CSC as appropriate to determine what should be disclosed.

j) The school will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

k) Where allegations have been made against staff, the school will consult with the Local Authority Designated Officer(s) (LADO) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

l) As a school we are not the employer of supply teachers, trainee teachers, some peri or sports staff, but recognise we are still responsible for ensuring that any allegations against a supply teacher, trainee teacher, peri or sports coach, not directly employed by us, are dealt with properly. In no circumstances will we decide to cease to use a supply teacher, trainee teacher, peri or sports staff, due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

m) We as a school, and our governing body will work with governing bodies and proprietors of other schools or establishments and discuss with the supply agency or agencies where the supply teacher, trainee teacher, peri or sports staff, is working across a number of schools, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

n) While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

Appendix 1 Forms of abuse and neglect and specific safeguarding risks

1 **Abuse and neglect.**

1.1 All staff should be aware of the indicators of abuse, neglect, and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

1.2 Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

1.3 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

1.4 Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content

1.5 Other indicators of abuse or neglect include being involved in modern slavery, child to parent or caregiver abuse.

2 **Definitions of abuse and neglect**

2.1 **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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place in person and/or wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

2.2 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 and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of, along with the different issues as set out in KCSIE referred to in paragraphs 4.1 and 4.2 of this Appendix.

2.3 **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.

2.4 **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 involve verbal abuse, for example persistent criticism. It may also 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 and prejudiced-based or discriminatory 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.

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

2.6 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 and all staff should be aware of it and of their school's policy and procedures for dealing with it. The school policy and procedures can be found in Appendix 3.

2.7 **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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

3.1.4 deterioration in educational progress and/or lack of engagement;

3.1.5 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.6 the pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general well-being;

3.1.7 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.8 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and

3.1.9 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 The RBKC/Westminster Safeguarding Children Partnership can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific safeguarding issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 child abduction and community safety incidents;

4.1.2 children and the court system;

4.1.3 children absent from education (see section 5 below);

4.1.4 children with family members in prison;

4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);

4.1.6 county lines;

4.1.7 modern slavery and the national referral mechanism;

4.1.8 cybercrime;

4.1.9 domestic abuse;

4.1.10 homelessness;

4.1.11 so-called 'honour-based' abuse (including Female Genital Mutilation and Forced marriage);

4.1.12 preventing radicalisation;

4.1.13 private fostering;

4.1.14 child on child abuse;

4.1.15 sexual violence and sexual harassment between children in schools;

4.1.16 upskirting;

4.1.17 modern slavery.

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Children who are absent from education

5.1 Children being absent from school, particularly repeatedly and/or for prolonged periods and children missing education, can act as a vital warning sign of a range of safeguarding possibilities including abuse and neglect such as sexual abuse or exploitation, and can also be a sign of child sexual and criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called "honour-based" abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the school gives rise to a concern about his / her welfare.

5.2 Where reasonably possible the school will hold more than one emergency contact for each pupil.

5.3 The school shall inform the local authority of any pupil who is going to be added to or deleted from the school's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2024 (as amended).

5.4 This will assist the local authority to:

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

5.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

5.5 The school shall inform the local authority of any pupil who:

5.5.1 fails to attend School regularly; or

5.5.2 has been absent without the school's permission for a continuous period of ten school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

6 Elective Home Education (EHE)

6.1 Where a parent expresses their intention to remove a pupil from School with a view to educating at home, the school will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

7 Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)

7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

7.1.1 in exchange for something the victim needs or wants e.g. money, gifts, or affection; and / or

7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/ or

7.1.3 through violence or threat of violence to victims (and their families).

7.2 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

7.3 Where a child could be a perpetrator of exploitation, there must be a safeguarding response to assess risks, and referrals to the local authority made, where relevant, for example for modern slavery.

7.4 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.5 Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. The victim may have been exploited even if the activity appears consensual.

7.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

7.7 Some of the following can be indicators of both CSE and CCE, including children who:

7.7.1 appear with unexplained gifts, money, or new possessions;

7.7.2 associate with other young people involved in exploitation;

7.7.3 suffer from changes in emotional well-being;

7.7.4 misuse drugs and alcohol;

7.7.5 go missing for periods of time or regularly come home late; or

7.7.6 regularly miss school or education or do not take part in education.

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

7.9 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based

methods of compliance and may, or may not, be accompanied by violence or threats of violence.

7.10 CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

7.11 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

7.11.1 have older boyfriends or girlfriends; or

7.11.2 suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

8 County lines

8.1 County lines[17] is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line." They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

8.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

8.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

8.4 Additional reporting duties:

8.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be made alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;

8.4.2 where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism[18] should be made.

[17] See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information.
[18] For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and Home Office guidance: Trafficking: safeguarding children

9 Serious violence

9.1 We recognise that serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

9.2 As a school we play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

9.3 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:

9.3.1 Increased absence from school;

9.3.2 a change in friendships or relationships with older individuals or groups;

9.3.3 a significant decline in performance;

9.3.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

9.3.5 It may involve, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy).

9.3.6 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

9.4 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

10 Cybercrime

10.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using a computer).

10.2 Cyber-dependent crimes include:

10.2.1 Unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

10.2.2 Denial of Service (Dos or DDos) attacks or 'booting' - attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic;

10.2.3 Making, supplying, or obtaining malware e.g. viruses, spyware, ransomware, botnets, and Remote Access Trojans with intent to commit further offence.

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

10.4 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

11 Domestic abuse

11.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional.

11.2 Children can be victims of domestic abuse. They may see hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

11.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

11.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

11.5 **Operation Encompass.**

11.6 We are aware of the statutory duty on police forces to inform education settings about incidents of domestic abuse involving children. We will ensure we engage with our police partners to ensure they are able to share any Op Encompass notifications with us.

11.7 We understand the sensitive nature of responding to concerns regarding domestic abuse and recognise unplanned interventions can escalate risk to both children and others in a household experiencing domestic abuse.

11.8 Our DSL and Deputy DSLs will lead any response to Operation Encompass notifications and where necessary, we will take advice from our local safeguarding partners and where appropriate, the Op Encompass helpline, before responding.[19]

12 So-called 'honour-based' abuse

12.1 All forms of so-called 'honour-based' abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

13 Female genital mutilation (FGM)

13.1 FGM is a form of so-called 'honour-based' abuse. It 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.

13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

13.3 All staff must be aware of the requirement for teachers 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. The report should be made orally by calling 101, the single non-emergency number. 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

13.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the school's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents, and teaching about FGM.

14 Forced marriage.

14.1 Forced marriage is also a form of so-called 'honour-based' abuse. Forcing a person into 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 or 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

[19] Educational settings : Operation Encompass

consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

14.2 Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

14.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the multi-agency guidelines: handling case of forced marriage (HM Government, April 2023)

14.4 Staff should speak to the DSL if they have any concerns. Pages 75-80 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

15 Radicalisation and the Prevent duty.

15.1 The school has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

15.1.1 Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools safeguarding approach.

15.1.2 New definition of extremism - the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

i. negate or destroy the fundamental rights and freedoms of others; or

ii. undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or

iii. intentionally create a permissive environment for others to achieve the results in (1) or (2).

15.2 Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The school is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

15.3 The school has adopted the government's definitions for the purposes of compliance with the Prevent duty:

15.4 **Extremism:** " *vocal or active opposition to fundamental British 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."*

15.5 **Radicalisation:** " *the process of a person legitimising support for, or use of, terrorist violence.*"

15.6 **Terrorism**: "*an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause*."

15.7 Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet). Further guidance can be found here Managing risk of radicalisation in your education setting (DfE, September 2023).

15.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

15.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting people susceptible to radicalisation (HM Government, April 2025) The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

15.10 Our Prevent and Channel partners are listed at the start of this policy.

16 Child on child abuse

16.1 All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents,
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- serious physical assault and harm, or the threat of harm with a weapon,

- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi nudes,
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

16.3 The school's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

16.4 Risk assessments are undertaken by the school to assess the risk of child-on-child abuse and/or any other safeguarding issues associated with children sharing overnight accommodation in its boarding accommodation.[20]

17 Online safety

17.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

17.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. See the School's online safety policy for further guidance.

17.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

17.3.1 **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

17.3.2 **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

[20] Required in standard 8.4 of NMS.

17.3.3 **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

17.3.4 **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils or staff are at risk, it should be reported to the Anti-Phishing Working Group (https://apwg.org/).

18 Sharing nudes and semi-nude images and videos

18.1 Consensual and non-consensual making or sharing of nudes and semi-nude images and/or videos can be signs that children are at risk and requires a safeguarding response

18.2 Consensual and non-consensual making or sharing of nudes and semi-nude images means the making, taking and sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.

18.3 Making or sharing of nudes and semi-nude images includes digitally altered and AI-generated images ("deepfakes").

18.4 The school treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

18.5 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

18.6 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

18.6.1 it is the only way to make a decision about whether to involve other agencies, as there is insufficient information available as to its contents;

18.6.2 it is necessary to report the image to a website, app, or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or

18.6.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

18.7 Where viewing an image is unavoidable:

18.7.1 viewing should take place on School premises;

18.7.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

18.7.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

18.7.4 full details of the viewing must be recorded in the school's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

18.7.5 any member of staff who views an indecent image should be given appropriate support.

18.8 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

18.9 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

18.10 If external agencies do not need to be involved, the school must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

18.11 If images have been shared online and cannot now be deleted by the person who shared them, the school should consider reporting the images to the relevant web host or service provider (if an option is provided) or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

18.12 Where a pupil receives unwanted images, the school should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address and advised to make a report to the Police.

18.13 The UK Council for Internet Safety's advice note Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.

19 Upskirting

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

19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

19.3 The school will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the school's child protection procedures.

19.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

20 Children in the court system

1) 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 https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-5- to 11-year-oldsto 11-year-olds and https://www.gov.uk/government/publications/young-witness-12- to 17-year-olds17-12- to 17-year-olds17 year olds.

2) 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.

3) 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 Making child arrangements if you divorce or separate: Making child arrangements with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

21 Safeguarding children with medical conditions

1) Please see separate policy for how school will support pupils at school with medical conditions and also our Allergy Safety in school policy.

2) We recognise that where there has been an incident relating to the management of a pupil's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners unless we are concerned that the pupil might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.[21]

22 Special educational needs and disabilities or physical health issues

22.1 The school welcomes pupils with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the school's curriculum, ethos, culture, policies, procedures, and premises are made accessible to everyone. See the School's policy on (special educational need and learning difficulties and disability).

22.2 We recognise that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. We also recognise that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children.

These can include:

[21] Further information is provided in statutory guidance Supporting pupils with medical conditions at school - GOV.UK and Allergy safety in schools - GOV.UK

a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,

b) these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,

c) the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,

d) communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,

e) the need for intimate care or that these children are isolated from others,

f) that these children are more likely to be dependent on adults for care, and

g) these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so.

22.3 We will ensure that any reports of abuse involving children with SEND will have close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO) or the named person with oversight for SEND in a school (Miss Pola

22.4 As a school will consider what extra pastoral support and attention can be provided for these children, along with ensuring any appropriate support for communication is in place[22].

22.5 **Mental Health**

22.6 The mental health lead in our school is Nicola Gray (DDSL).

22.7 All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

22.8 Staff should not attempt to make a diagnosis as this can only be done by a trained professional. However, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

22.9 These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and

[22] Additional information can be found SEND code of practice , Supporting children at school with medical conditions and NSPCC safeguarding children with SEND

- physical signs of self-harm or neglecting themselves.

22.10 We recognise that not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, our staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

22.11 Where staff have a concern about a child's mental health that is also a safeguarding concern, they will follow this policy and speak to their designated safeguarding lead or deputy.

22.12 If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person[23]. [24].

22.13 Our staff understand they have an important role to play in supporting all children by:

(a) promoting good mental wellbeing and preventing the onset of mental illness,

(b) observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

(c) ensuring early targeted support is provided, and liaison with/referral to specialist services where needed.

22.14 Where there are concerns about a pupil's mental health staff will follow the normal reporting pathway and inform the DSL or Deputy DSL.

22.15 Where support is needed, the designated safeguarding lead (or a deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk. [25]

22.16 Concerns regarding mental health problems may be identified in several ways. This could be through observation, analysing of data from STEER assessments or through patterns observed in safeguarding records. Staff are trained to report mental health concerns to the Assistant Head Pastoral (DSL) and follow the Mental Health & Wellbeing policy.

23 Looked after children and previously looked after children.

23.1 The Inspired Education Group ensures (where applicable) that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

23.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

23.1.2 contact arrangements with birth parents or those with parental responsibility;

23.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

[23] If child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

[25] More guidance can be found at https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2 and for secondary schools https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview

[25] More guidance can be found at Promoting children and young people's mental health and wellbeing

23.2 The DSL maintains these details, including contact details of the child's social worker[26]. See 28.6.6 in the policy for the DSL's role in relation to pupils who are looked after children.

24 **Care leavers.**

24.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

24.2 Educational Support for Looked after Children, Care leavers and children with a social worker.

24.3 We recognise that children who are looked after, care leavers or have a social worker may face additional educational challenges. The person in our school responsible for supporting these children to achieve is Miss Nicola Wright (DSL).

25 **Children who are lesbian, gay, bisexual, or trans (LGBT)**

25.1 The school recognises that a young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

25.2 LGBT inclusion is taught as part of the statutory relationships education/ RSE/ PSHE curriculum.

25.3 All staff are aware of these vulnerabilities and the school endeavours to provide a safe space to speak out or share concerns.

25.4 **Gender Questioning Children**

- As a school we recognise some children who question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.
- We also recognise that it is not for us as a school to initiate any action in this area; this guidance is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school is responding.
- Our schools has a statutory duty to safeguard and promote the welfare of all children. We will consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected.
- This means that the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.
- As well as complying with our safeguarding obligations as above, we must also comply with our duties under the Equality Act 2010 and the Human Rights Act 1998.
- In line with the responsibilities of schools to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations

[26] See https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children for guidance on the DSL's role in relation to looked after children.

under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, we must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions.

- We will treat any requests for social transition by working with the child, family sensitively and in accordance with the above and other guidance as appropriate.

Appendix 2 Concerns about a child - guidance for staff

1 **Receiving a disclosure**

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

1.3 If there is a medical need, contact a member of the DSL team and do not examine the injury yourself.

1.4 Reassure the pupil, they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.7 Pass on the record when reporting the concern in accordance with this policy.

2 **Recording a concern**

2.1 Staff must record all concerns in writing within the school's child protection safeguarding system (Wellbeing Manager).

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the pupil's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event /concern / conversation;

2.2.4 details of how the concern was followed up and resolved,

2.2.5 a note of any action taken and by whom, decisions reached and the outcome;

2.2.6 the name and position of the person making the record.

2.3 The Wellbeing Manager record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 Use of reasonable force

3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed[27].

3.2 Staff should refer to the school's behaviour and discipline policy and the staff code of conduct for more detailed guidance about the use of reasonable force, see Appendix 9.

[27] Further guidance can be found in Government guidance: Use of reasonable force in schools.

Appendix 3 Dealing with allegations of child-on-child abuse.

1. Child on child abuse

1.1 Our school is very clear; we have a zero-tolerance approach to child-on-child abuse. We will never be pass off incidents as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

1.2 We recognise the escalatory nature of misogyny and the benefits of early identification to support our approach to minimising the risk of HSB, sexual harassment and sexual violence,

1.3 We recognise that by staff not challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, risks normalising those behaviours.

1.4 Therefore, all of our staff will challenge inappropriate behaviour between pupils and anyone who suffers, witnesses, or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

1.5 All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

1.6 The school will continually review the effectiveness of policies and procedures in minimising the risk of child-on-child abuse. We will do that by having an effective PSHE curriculum tailored to the needs of our pupils, and by reviewing any child-on-child abuse cases within school and any local or national trends and adapt our response accordingly.

1.7 Our school has the following systems in place so our pupils can report abuse, knowing their concerns will be treated seriously:

- Speaking to any member of staff
- Pembridge PULSE Slips – Children can fill in a slip with just their name and date to request to speak to the Assistant Head Pastoral (DSL)
- Worry boxes
- Education via NSPCC Stay Safe Assemblies on abuse and how to report it

1.8 Until investigations have been undertaken and findings made, either by the police, the local authority or the school, the school will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This approach will be taken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the school's care and whether or not the pupil is under 18.

1.9 Staff will be careful about the terminology used to describe the pupils involved – whilst 'victim' and 'alleged perpetrator' are used in guidance these may not be appropriate terms to use in front of the children.

1.10 ALL allegations of child-on-child abuse will be recorded on the school's child protection recording system ALL allegations will be thoroughly investigated, after, where necessary, taking advice from the police.

1.11 ALL allegations of child-on-child abuse will be dealt with in accordance with this, the behaviour, or any other relevant policy.

1.12 We will support victims, perpetrators and any other children affected by child-on-child abuse through our pastoral processes and where police or children's services are involved, ensure there is consistent information and support for children and families.

1.13 Where necessary we will risk assess and safety plan for those pupils who are involved, working with families and other agencies where appropriate.

1.13 Staff understand that, even if there are no reports of child-on-child abuse at the school, it does not mean it is not happening; it may be the case that it is just not being reported. All staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2. Harmful sexual behaviour HSB

2.1 The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context.

2.2 We understand that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage.[28]

2.3 When assessing HSB, the ages and developmental stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size.

2.4 When assessing how to respond to HSB we will consider the ages and behaviour of the children involved[29] and where necessary take advice from Westminster Children's Services / Kensington & Chelsea Children's Services.

2.5 We recognise HSB can, in some cases, progress on a continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

2.6 Our DSL and Deputy DSLs will have a good understanding of HSB and will be aware of local support agencies to assist in decision making and referral pathways for specialist support.

2.7 Staff should be aware of 'Shore Space', an online resource developed by the Lucy Faithfull Foundation in collaboration with the UK Home office, providing a confidential chat service

[28] Sexual development and behaviour in children | NSPCC Learning.
[29] Responding to children who display sexualised behaviour.

supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

3. Sexual violence and sexual harassment (SVSH)

3.1. Where the misconduct may constitute sexual violence[30] (rape, assault by penetration with an object and sexual assault[31] or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

3.2. What is consent: 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:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16, and
- • sexual intercourse without consent is rape.

3.3. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.

3.4. SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

3.5. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims, and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

3.6. The 2021 Ofsted report "A Review on Sexual Harassment in Schools" concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The school acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4. Management of allegations of child-on-child SVSH

4.1. The initial report

4.1.1. The school recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to

[30] When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

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

respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2. The school recognises that child-on-child sexual violence can and does occur, both inside and outside of school.

4.1.3. The school acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.4. They should:

4.1.4.1. listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

4.1.4.2. where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;

4.1.4.3. where there is an online element, considering the searching, screening and/or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child;[32]

4.1.4.4. explain the next steps and how the report will be progressed;

4.1.4.5. make a written record of the report (recording the facts as the child has presented them);

4.1.4.6. inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 DSL's considerations

Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow, and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all of the circumstances into account, in the best interest of the pupils involved. The school's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue. The DSL will involve other staff as relevant, such as the SEND Co-ordinator where reports of abuse involve a child with SEND.

4.3 School's considerations

4.3.1 The school will consider:

a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but

[32] School staff can search pupils with their co-operation for any item. If a pupil refuses to co-operate staff may use reasonable force to search pupils if they have reasonable grounds for suspecting a pupil is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case-by-case basis. See Searching, screening and confiscation: advice for schools for further information.

their wishes will not always be determinative as the school may have to take action to protect other children;

b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour[33] has been displayed;

c) the ages and developmental stages of the children involved and any imbalance between them;

d) if there is an intimate personal relationship between the children;

e) whether there are any ongoing risks to those involved;

f) the time and location of any incident, and any action required to make the location safer;

g) the wider context; Before deciding how best to support and protect those involved the school will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension or safeguarding separation arrangements being put in place pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

h) The school will make a proportionate response to these matters in light of the circumstances and the factors identified above and decide if any further action is appropriate.

i) The school will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5 Investigations and findings

5.1 The school will record the findings of investigations undertaken by the police and/or the CPS and if f the police decide not to take any further action, it will consider together with the statutory agencies whether an investigation should be undertaken or commissioned by the school to enable it to determine whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the school should consider whether a limited investigation is appropriate. The concerns, discussions, decisions, and reasons for these should be recorded.

5.2 The school should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

[33] Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive, or violent may be helpful here.

5.3 In line with managing situations of child-on-child abuse internally, after collating all information and taking advice from children's social care. school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

Appendix 4 Raising allegations and low-level concerns.

Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low-level concern under this policy.

DSL	Nicola Wright Email: nicola.wright@pembridgehall.co.uk Telephone number: 0207 229 0121 Mobile number: 07890 068015
Head	Sophie Banks Email: sophie.banks@pembridgehall.co.uk Telephone number: 020 7229 0121 Mobile: 07816 198164
Chair of Governors	Mark Snell Email: mark.snell@inspirededu.com Mobile number: 07812 164 351
Nominated Safeguarding Governor	Jez Prior Email: jez.prior@inspirededu.com Mobile number: 07831 568013
LADO	**Safer Organisations Manager & Local Authority Designated Officer** Aqualma Daniel Telephone number: 07870 481 712 Email Aqualma.Daniel@rbkc.gov.uk **Royal Borough of Kensington and Chelsea / City of Westminster LADO Manager** Sally Smith Telephone number: 07967 764 794 Email: Sally.Smith@rbkc.gov.uk **Please contact duty LADO for consultations and referrals** Kensington and Chelsea Telephone: 020 7361 3013

	Email: KCLADO.Enquiries@rbkc.gov.uk Westminster Telephone: 020 7641 7668 Email: LADO@westminster.gov.uk

Purpose and application

1.2 **Purpose:** the school takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded, and dealt with effectively by the school.

1.3 **Application:** the Policy applies to all adults working in or on behalf of the school (whether on a paid or unpaid basis), including governors, supply staff, trainee teachers, peri or sports staff, volunteers, and contractors (**Staff**).

1.4 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the school. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

1.5 **Statutory guidance:** this policy has regard to the following statutory guidance:

1.5.1 Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers, trainee teachers and contractors (**Staff**), who are all adults working for, or on behalf of, the school. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(a) concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and

(b) allegations that may meet the harm threshold.

1.5.2 WTSC requires policies to be put in place setting out the process, including timescales, for investigation and what support and advice will be available to individuals against whom allegations have been made. WTSC requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

1.5.3 Some cases are clear cut and require immediate referral to LADOI. Other cases may not be so clear cut. In those less clear cut cases, we will always contact LADO for advice.

Key Staff duties

1.6 **Staff behaviour:** all Staff must comply with the School's Code of Conduct which sets out appropriate and expected standards of behaviour.

1.7 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the school). This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent, or another adult, or as result of checks or information brought to your attention.

1.8 **Duty to self-refer** you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

1.9 **A culture of sharing:** all Staff have a positive obligation to support the school's culture of openness and sharing without fear of reprisal.

2 What needs to be reported?

a. **Reporting all concerns:** all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

b. **Low level concerns:** a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.

c. **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

    i. behaved in a way that has harmed a child, or may have harmed a child; and / or

    ii. possibly committed a criminal offence against or related to a child; and / or

    iii. behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or

    iv. behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the school which creates a transferable risk.

d. **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

    i. the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, but explains in its explanatory notes that is because it encourages people to apply a "normal, everyday meaning";

    ii. the Children Act 1989 defines:

1. "harm" as "ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill-treatment of another";

2. "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

3. "health" as "physical or mental health".

3 How to raise concerns and allegations

1. **Duty of the DSL to refer concerns to the Head:** The Head remains the ultimate decision-maker in respect of all low-level concerns. Save for in cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible the DSL must speak to the Head in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.

2. **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the Head) whether this a low-level concern or an allegation of harm that may meet the harm threshold, you must raise this immediately with the Head.

3. **Concerns involving the Head and conflicts of interest:** where you identify a concern about the Head, you must report the matter immediately to the Nominated Safeguarding Governor without first notifying the Head.

4. **Concerns involving Governors:** where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.

5. **Concerns involving individuals/organisations using School premises: where the school** receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.

6. **Reports to the DSL:** If it is not possible for you to make a report to the Head or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Nominated Safeguarding Governor.

4 The school's response to concerns and allegations

1. **Appropriate action:** the school will ensure that appropriate action is taken to address concerns that are raised under this policy.

2. **Assessing concerns**: the Head (or, if the concern relates to the Head, the Chair of Governors, or the Nominated Safeguarding Governor) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, Head and

the Nominated Safeguarding Governor have all been trained to assess concerns, and to record and address them appropriately.

3. **Low level concerns:** if the school determines the concern is a low-level concern, then the school will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the school's capability or disciplinary procedures.

4. **Borderline cases:** the Head (or, if the concern relates to the Head, the Chair of Governors, or the Nominated Safeguarding Governor) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

5. **Referral:** where the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor) considers the concerns raised potentially meet the harm threshold, the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor) will make a report to the LADO before further action is taken. The Head (or, if the concern relates to the Head, the Chair of Governors, or the Nominated Safeguarding Governor) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

6. **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the school will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The school will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.

7. **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, the school will appoint a "Case Manager" to lead the investigation. The Case Manager will be either the Head or a person with appropriate authority appointed by the Head. Where the Head is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or Nominated Safeguarding Governor.

5 Disclosure of information about concerns and allegations

1 **Informing the individual of a concern:** the school will in most cases inform the individual concerned about any low-level concern that is raised about them.

2 **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

5 **Reporting restrictions:** the school is mindful of and will comply with the reporting restrictions under section 141F Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7 **Concerns about supply staff and contractors:** where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

6 Early Years Foundation Stage (EYFS)

1 **Report to Ofsted:** the school will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

2 **Timescale for Ofsted report:** these notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.]

7 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

1 **Report to the DBS:** the school is under a legal duty to make a referral to the DBS where a member of Staff is removed from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.

2 **Report to the Teaching Regulation Agency:** if a teacher is dismissed because they are found to have committed serious misconduct, or their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the school will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

8 Record keeping.

1 **Records of low-level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under the school's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the school will try to accommodate this as far as reasonably possible but cannot guarantee anonymity in all circumstances.

3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored securely on the school system and will be accessible by the Head, the Chair of Governors, the Nominated Safeguarding Governor, and the DSL only.

5 **Malicious or false low-level concerns and allegations:** details of low-level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

6 **Retention of records:** in line with the school's information and records retention policy, information stored on staff personnel files about low-level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the school indefinitely. The school may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

9 References

1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the school's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The school will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

10 Questions

Contact: please contact Miss Nicola Wright (DSL) if you have any questions about this policy

Appendix 5 Local arrangements

Outline of how the LSCP and other key partners (such as schools) will work together to keep all children and young people safe can be found here: LSCP Multi-Agency Safeguarding Children Arrangements (rbkc.gov.uk)

Kensington and Chelsea and Westminster LSCP adhere to the London Safeguarding Children Protection Procedures: London Safeguarding Children Procedures

Appendix 6 Working Together to Safeguard Children 2026

Please follow this Working Together to Safeguard Children 2026 for the full version of the guidance.

Appendix 7 Keeping Children Safe in Education 2026

Please follow KCSIE 2026 for the full version of the guidance.

Appendix 8 Early Years Foundation Stage Statutory Framework

Please follow this LINK for the full version of the guidance.

Appendix 9 Use of Restrictive Interventions Policy

Please see the school's Use of Restrictive Interventions Policy (including reasonable force and seclusion) on the school website.

For staff - What to do if you're worried about a child

Why are you concerned?

- something a child has said, such as an allegation, disclosure or comment that causes concern
- changes in appearance, presentation, behaviour, emotional wellbeing or attendance
- unexplained injuries, marks or bruises
- witnessed or reported concerning, harmful or inappropriate behaviour, including online
- concerns linked to family circumstances, peer relationships or wider community context

Act immediately and record your concerns: If urgent, speak to a DSL first…

- Follow the school's procedure:
- Reassure the child and listen carefully; do not promise confidentiality
- **If you have a clear understanding of what happened do not ask any more questions. If you are unclear about what they are saying, use open questions if needed, for example, TED: Tell, Explain, Describe.**
- Record facts and not opinions, using the child's own words where possible
- Report to the DSL: seek support for yourself as required

Inform DSL / Dep DSL

- **If a child is at risk of immediate harm, is unsafe to go home, or requires urgent protection**, make urgent contact with local child protection hub – Westminster Children's Services (020 7641 4000) / Kensington & Chelsea Children's Services (020 7361 3013) or call the Police on 999.
- If there is no immediate risk of harm, consider what support is needed in line with the **LOCAL SAFEGUARDING ARRANGEMENTS** This may include internal support, signposting to community based early help services, contacting the Police, reporting allegations against staff to the LADO, or making a Request for Support to the early Help or other local services.
- If the school believes a child may need support but is unclear whether a Request for Support is required, advice can be sought by contacting RBKC / Westminster Children's Services.
- If support is required out of working hours, contact the Out of Hours Service. Westminster: 020 7641 2388 / RBKC: 020 7373 2227

DSL / Dep DSL

DSL record keeping

- Be clear. Stating what happened. What level of risk DSL considers it to be (using local safeguarding partnership threshold document) and the decision if a referral will or not be made – include details of why no referral is being made if that is the decision.
- Set any actions and be clear when the case will be reviewed and who by.:
- If case is being 'monitored' who by, what are they monitoring, for how long and when will it be reviewed and by who.