



The Study Prep
WIMBLEDON

Name of Policy	Safeguarding and Child Protection Policy
Owner of Policy	Safeguarding Team /Governors
Date Reviewed by HMT Member	July 2024
Date of Governors' Review	October 2024
Date of next review	July 2025



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SAFEGUARDING POLICY (Safeguarding and Promoting the Welfare of Pupils)

Policy Statement

This policy applies to all pupils including those in Early Years Foundation Stage (EYFS). This policy is reviewed and updated annually (as a minimum) and is available on the School website.

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

- Keeping Children Safe in Education (September 2024) ("KCSIE")
- KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)
- KCSIE also provides links to various toolkits and additional advice and support
- Working Together to Safeguard Children (dated 2018 but updated 2022) ("WT")
- WT refers to the non-statutory advice: Information sharing (July 2018)
- Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Prevent is supplemented by non-statutory advice and a briefing note:
 - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
 - *The use of social media for on-line radicalisation* (July 2015)
- Relationships education, relationships and sex education (RSE) and health education (September 2021).
- Children Missing Education (September 2016)
- Children's Social Care National Framework (December 2023)
- Behaviour in schools (September 2022)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023) After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)]

This policy also takes into account the procedures and practice of Merton local authority as part of the multi-agency safeguarding procedures set up by the Merton Multi-Agency Safeguarding Hub (MASH).

EQUALITY ACT 2010

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

The Study Safeguarding team is:

Name	Role	Responsibility	Phone and Email
Sarah Lee	Deputy Head	DSL (Wilberforce House)/ EYFS Safeguarding Lead	Ext: Mobile: 07871731133 Sarah.lee@thestudyprep.co.uk
Chris Baalham	Deputy Head	DSL (Spencer House)	Ext: 014 Mobile: 07754550528 Chris.baalham@thestudyprep.co.uk
Sharon Maher	Head	DDSL	Ext: 012 Mobile: 07999 049396 sharon.maher@thestudyprep.co.uk
Melissa Peachey	Head of Learning Enrichment	DDSL	Melissa.Peachey@thestudyprep.co.uk
Helen Lowe	Governor	Safeguarding Governor	Contact via Tracy Beard, Bursar and Clerk to Governors

Aims:

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

The School acknowledges that even when there are no reported cases of child-on-child abuse, this does not mean that it is not happening. A culture of this could happen here is promoted and staff are alert to the possibility. The School has a zero tolerance approach to child-on-child abuse and the management of any such incidents is outlined in the Anti-Bullying Policy.

Objectives:

- Taking action to enable all children to have the best outcomes
- 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 the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care

To provide guidance for staff on how to recognise abuse, deal with suspected abuse or a ‘disclosure’ and to avoid allegations of abuse.

To outline how the Governing Board ensures proper oversight of safeguarding, including the name of the board level lead for safeguarding, how the training of the governing body takes place and arrangements for how the board reviews the School’s Child Protection Policy and procedures annually.

To outline arrangements for allegations against members of staff, supply staff, volunteers and the Head, including reporting to the DBS/TRA.

To outline how the school manages child-on-child abuse, including the sharing of nudes and semi-nudes and any other relevant issues, and how victims and perpetrators will be supported.

Transparency:

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

All staff new to the School and governors new to the board of the school will receive training on safeguarding and child protection at induction. This includes details of arrangements within the School and the local authority. Any changes to arrangements will form part of the update training for staff provided annually.

Training for governors should provide them with the ability to provide strategic challenge to test and assure themselves that the procedures in place at the School are effective and support the delivery of a robust whole school approach to safeguarding.

Local Safeguarding Contacts/Resources:

Name	Role	Organisation	Phone and Email	Address
John Shelley	Local Authority Designated Officer (LADO)	Merton Local Authority LADO	Tel: 0208545 3187 Mobile: 07814642728 lado@merton.gov.uk	MASH Team 12th Floor, Merton Civic Centre London Road, Morden SM4 5DX
Multi-Agency Safeguarding Hub(MASH)	The single point of contact for all safeguarding concerns regarding children and young people in Merton.	Merton	MASH Team 12th Floor, Merton Civic Centre London Road, Morden SM4 5DX	020 8545 4226 or 020 8545 4227 or 020 8770 5000 (out of hours) 020 8545 4204 (fax) mash@merton.gov.uk

Prevent	Support and advice about extremism		Prevent referrals will be forwarded by the Merton Safeguarding Partners (MSCP) , to the Prevent and Engagement Officer for Wandsworth, Merton and Sutton – 020 8545 4226	MSCP TEL: 020 8545 4226 London Borough of Merton, Civic Centre, London Road, Morden, SM4 5DX
NSPCC Report Abuse in Education Advice Line				TEL: 0800 136 663 help@nspcc.org.uk https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/
NSPCC Whistleblowing Advice Line				ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
CLEOPS	Child Exploitation and Online Protection Centre			www.ceop.police.uk/contact-us/
Merton CAMHS	Child and Adolescent Mental Health Service			Tel: 02082548061CAMHS, Birches House , Birches Close, Cricket Green, Mitcham Surrey, CR4 4LQ
Wandsworth CAMHS	Access Child and Youth Mental Health Service			Tel: 02035136631 Building 19 Springfield University Hospital 61 Glenburnie Road London SW17 7DJ
Wandsworth Multi Agency Safeguarding				Hub 020 8871 6622 (9am to 5pm) or the Out of hours: 020 8871 6000 or email mash@wandsworth.gov.uk
Kingston CAMHS	Child and Adolescent			Woodroffe House Tolworth Hospital

	Mental Health Service			Red Lion Road Surrey KT6 7QU
Local Police				Tel: 999 15-23 Queens Road Wimbledon SW19 8NN
DfE dedicated helpline	For non emergency advice for staff and governors			Tel: 0207340 7264 Counter.extremism@education.gov.uk
Disclosure and Barring Service				ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@db.gov.uk
Teaching Regulation Agency				ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
Independent Schools Inspectorate				TEL: 0207 6000 100 EMAIL: concerns@isi.net

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

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

Concerns about a Child

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility and all staff are made aware of this collective responsibility. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements in place for listening to pupils and providing early help and intervention. The School will always ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. Details of these arrangements are set out in this Policy.

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

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. The Board of Governors recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to one of the Designated Safeguarding Leads ("DSLs").

The Board of Governors will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as 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; and taking action to

enable all children to have the best outcomes. Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

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

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation. Safeguarding of pupils at The Study also takes account of the school's Anti-Bullying Policy, Behaviour Policy and E-Safety Policy.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

At the Study staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSLs, sharing information with other professionals to support early identification and assessment and, in some cases acting as the lead professional in undertaking early help assessment.

Staff should not assume that someone else will take action and share information that might be critical in keeping children safe.

Records are kept of all concerns raised using the online CPOMS system. All staff know to record any concerns here and this provides alerts to the DSLs and DDSs with immediate effect so that appropriate action may be taken. There is a weekly Pastoral Meeting, attended by the safeguarding team, Head of Computing, SENCo. Any pupils who are currently a concern are discussed, along with any actions to be taken. Minutes are stored in the HMT shared drive, under Pastoral Minutes. Minutes are reviewed at HMT and Leadership meetings. Staff raise awareness of any pupils they are concerned about, during the weekly Staff Briefings and Teaching Assistant meetings.

All pupils are taught how to keep themselves and others safe. In PSHE and RSHE lessons, circle time, form time, assemblies and classroom lessons, pupils are made aware that they can approach any member of staff about any concerns or issues they may have.

The School recognises, and all staff understand, that preventative education is most effective in preparing its pupils for life in modern Britain and we promote a zero tolerance approach to misogyny/misandry, sexism, homophobia, biphobic and sexual harassment/violence. (See RSHE Policy)

The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

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

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The School implements a child-centred approach to safeguarding. Whilst the School is committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

The role of the DSL is to:

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

Work with others

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

Undertake training

The DSLs (and deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSLs should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School's safeguarding policy and procedures especially for new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff

Raise Awareness

- The DSLs should ensure the School's Safeguarding Policy and procedures are known, understood and used appropriately;
- Ensure the relevant safeguarding policies are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the local LSCE to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection files

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

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

Availability

During term time the DSLs (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances the DSL may be available via Skype.

Managing Disclosures

When a pupil wants to confide in a member of staff, all staff are required to follow the guidance below:

Do

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

Don't

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

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in on CPOMS. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

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

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

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

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSLs and any deputies, should consider the context in which incidents and behaviour occur and how they can be associated with factors outside the School. The School will, as part of the wider assessment of pupils, consider whether environmental factors are present in a pupil's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help

Early Help is defined as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a pupil who:

- Is disabled or has certain health conditions
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from education, care or from home
- Experienced multiple suspensions, is at risk of being permanently excluded from school
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the pupil, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is experiencing, or is at risk of experiencing, family ostracism
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with one of the School's DSLs. The DSL will consider the appropriate action to take in accordance with the Merton Safeguarding Children Executive (three safeguarding partners) referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023) ("WT").

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

What should staff do if they have concerns about a child?

If staff (including governors, agency staff, supply staff, agency staff and volunteers) have any concerns about a pupil (as opposed to a child being in immediate danger, they should raise this with the School's DSLs or DDSLs as soon as is practicable. The DSLs will decide whether to make a referral to children's social care. As set out above, staff should not assume that someone else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than a DSL makes a referral, they should inform the DSLs as soon as possible that a referral has been made. If a child's situation does not appear to be improving, one of the DSLs should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing using CPOMS. All staff have been made aware of this in their training. Staff are aware of the definitions of abuse as outlined in Appendix 1 and that, as per KCSIE 2024, this would also include "honour" based violence and forced marriage. However, given the pupil profile at the School, the latter are not deemed to be high risk events.

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

The school recognises the difference between safeguarding children who have suffered, or are likely to suffer, significant harm and those who are in need of additional support from one or more agencies. The former, subject to local procedures and thresholds should be reported to Children's Social Care immediately; the latter should lead to early help, and inter-agency processes.

If staff (including governors, supply staff, agency staff, agency staff and volunteers) believe that a pupil is in immediate danger or is at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make such a referral and all staff are aware of this. Any such referral must be made immediately of staff being aware of the risk and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. Where referrals are not made by one of the DSLs, the DSLs should be informed as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSLs and children's social services as appropriate. All concerns, discussions and decisions (together with reasons) will be recorded in writing using CPOMS. The School's Local Safeguarding Children Partnership is Merton (<https://www.mertonscp.org.uk/>)

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

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

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

Staff should follow the School's normal referral processes when there are concerns about pupils who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care, the local authority Prevent lead, the local police force (101 - the non-emergency number) The School's Safeguarding Team carries out an annual Prevent Risk Assessment which is reviewed by the governors, to ensure that any risk of pupils being drawn into extremist activities is carefully assessed. The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out an appropriate annual risk assessment. This risk assessment is completed by the DSLs, DDSL's and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

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

Staff must report to the Police, cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSLs and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

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

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

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

How should staff respond to an incident of nudes and semi-nudes being shared by pupils?

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming

platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'up skirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to one of the DSLs as soon as possible.

The DSLs will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.

- If it is determined that there is a risk of harm, the DSL must make a referral to children’s social care and/or the police immediately.

An immediate referral to police and/or children’s social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children’s social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children’s social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School’s pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

What staff should do if they have safeguarding concerns about another staff member?

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

What staff should do if they have concerns about safeguarding practices in the School?

The School aims to ensure there is a culture of safety and raising concerns and an attitude of ‘it could happen here’.⁴¹ Where staff have concerns about poor or unsafe practices and potential failures in the School’s safeguarding systems, these should be raised in accordance with the School’s whistleblowing procedures. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found in the [Local Safeguarding Contacts/Resources](#) table at the start of this policy.

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

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

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

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

What staff should do if a child requires mental health support?

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

The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. Staff have access to a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

What staff should do if a pupil goes absent from education ?

Children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the School's response to persistently absent pupils and children missing education supports identifying such abuse and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. The School's procedures for unauthorised absence and for dealing with a pupil who goes missing from education are detailed in the Attendance Policy. The School will report to the Local Authority in which the pupil resides, a pupil who fails to attend school regularly or has been absent from School without the School's permission for a continuous period of 10 school days or more.

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

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance 'Working together to improve school attendance: *statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)*.

ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

CHILD ON CHILD abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include;

- bullying (including cyber bullying, prejudiced-based and discriminatory bullying);
- abuse within intimate partner relationships,
- abuse within intimate partner relationships between peers
- 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;
- initiation/hazing type violence and rituals(this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, or cause the victim humiliation, distress or alarm;
- sexting
- consensual and non-consensual sharing of nudes and/or semi-nudes images and or videos(also known as sexting or youth produced sexual imagery);
- sexual assault
- gender-based issues
- sexual behaviours including child on child sexual violence and sexual harassment
- 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.
- it can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future Abusive comments and or interactions should never be passed off or dismissed as "just banter", "just having a laugh" or "part of growing up". Nor will harmful sexual behaviours be dismissed as such. Examples of bullying in a school such as the Study, largely comprise name calling, or exclusion from groups or friendships. This should not be confused with the "falling out", and "making up the next day" that frequently happens between girls of this age. For this reason, bullying can be defined as behaviour that is intentional and usually repeated over time which physically or emotionally hurts another individual or group (Merton Council threshold for what constitutes bullying). Staff are aware that bullying can include matters such as gender based violence, sexual assaults and sexting.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will

follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

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

The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that pupils with disabilities(are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children, the School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. Staff are aware of the pupils on the **special educational needs and disabilities register** and these pupils are monitored by the School's SENCo/Head of Learning Enrichment. Any pastoral issues are discussed with staff at weekly briefings and appropriate action taken.

The School takes the following steps to minimise the risk of child on child abuse:

- Time is allocated in PSHE lessons and form time to discussions of what constitutes appropriate behaviour and why bullying and lack of respect for others is never right. Pupils are encouraged to speak out when they feel sad, anxious, worried etc.
- Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.
- We use opportunities, such as the annual national Anti-Bullying week and Safer Internet Day to teach pupils about the unacceptability of bullying and abusive behaviour and to promote the safe use of the internet and mobile phones, in and out of school.
- The pastoral care issues record on CPOMS referred to in our Anti-Bullying Policy enables staff to discern trends in bullying and behavioural issues and to take appropriate measures based on this.
- The school has a content firewall for online searches and alerts the DSLs when any inappropriate content is accessed.

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

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

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

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSLs who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSLs decide to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSLs may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Merton Safeguarding Children Executive referral process.

The School's approach to sexting in accordance with its Anti-Bullying Policy.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (February 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

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

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator/s. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This

may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises (including during any before or after school-based activities) and school transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, one of the DSLs will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

What staff should do if they have safeguarding concerns about another staff member?

If staff have concerns about another staff member (including supply staff, agency staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of the Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at Merton Local Authority.

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

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

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

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

The school takes every possible measure to ensure its staff, governors, supply staff and visitors are suitable to work in the school. Please also see: Safer Recruitment Policy.

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity, follows Department for

Education statutory guidance and Merton Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a child, or may have harmed a child and/or:
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicated that they may pose a risk of harm to children if they were to work regularly or closely with children;; and/or.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with pupils in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School will not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

When dealing with an allegation about a staff member the School will apply common sense and judgement, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager', who will keep the Head informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head or one of the DSLs is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of Governors and the Merton designated officer. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager the case manager should contact children's social care and as appropriate the Police.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child (ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
 - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
 - providing an assistant to be present when the individual has contact with children;
 - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
 - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
 - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

6. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting
11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious will be removed from the individual's personnel records, unless the individual gives consent for retention of the information. The information to be kept on file includes a clear and comprehensive

summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file.

All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA).

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

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

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTORS

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

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

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

When using an agency, the School should inform the agency of its process for managing allegations, but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting

the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Code of Conduct can be found on the School's website. The aim of the Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Code of Conduct at all times.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 12 months or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

The Study has a **Recruitment Policy**, which forms part of its Safeguarding Policy. All members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to the statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment Policy.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Wherever possible music lessons will take place in rooms with glass doors which are visible to the public. All governors, regular volunteer helpers, contractors working regularly during term-time, such as contract catering staff, are also vetted. The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed. Our policies are reviewed by governors annually.

Contractors do not undertake work on site during school hours unless the work required is of an urgent nature, in which case they are supervised at all times by a staff member.

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

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

Safer Employment Practices – staff reporting duties

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

MANAGEMENT OF SAFEGUARDING

The School's DSLs are Sarah Lee and Christopher Baalham, they are members of the leadership team

The Deputy DSLs are Sharon Maher (Head), Melissa Peachey (SENDCo/Head of Learning Enrichment). They are the individuals to whom reports should be made in the absence of the DSLs. This ensures that the required cover for the DSL role is in place at all times.

The DSLs' and DDSLs' contact details can be found on the Key Contacts page at the beginning of this policy.

The DSLs' role is to take lead responsibility for safeguarding and child protection matters in the School. The DSLs' responsibility is to maintain an overview of safeguarding within the School, to establish and maintain open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice.

The DSL works with the governors to review and update the School's Safeguarding Policy.

Where a pupil leaves the School, including for in-year transfers, the DSLs will also ensure their child protection file is transferred to the new school (separately from the main pupil file) 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. The DSLs will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSLs should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

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

During term time, the DSLs or Deputy DSLs will always be available in person during school hours for staff to discuss any safeguarding concerns. For out of hours/out of term activities, the DSLs will operate a rota, so that a DSL/DDSL is always available.

The DSLs should liaise with the three safeguarding partners and work with other agencies in line with WT. "NPCC - When to call the police" can assist the DSLs to understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSLs will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs and this responsibility should not be delegated.

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

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

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

Whistleblowing Policy

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

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

STAFF TRAINING

All new staff will be provided with induction training that includes:

- the Child Protection Safeguarding Policy (including the policy and procedures to deal with child on child abuse)
- the role and identity of the DSLs and DDSLs
- the Behaviour Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Code of Conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- a copy of Part one of KCSIE at least
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- a copy of Part one of KCSIE at least {(or, for staff that do not work directly with children, Annex A)}; and
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE and Part five of KCSIE.

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

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

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

- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a visitor lanyard by the school secretary and who are escorted throughout their visit.
- Contractors working on a designated site that is physically separated from the rest of the school who are required to sign in and out at their site office and to wear security badges at all times
- Contractors working during the school holidays.

All staff are also required to:

- Read Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via staff meetings
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by training and follow up discussion and questioning
- Receive training in safeguarding and child protection regularly, in line with advice from Merton Safeguarding Children Partnership. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring and harmful sexual behaviours, (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff, [governors and trustees] know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

DSL(s)

The DSLs receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children training in the Merton Local Authority [three safeguarding partners'] approach to Prevent duties[and harmful sexual behaviours]. Further details of the required training content for the DSLs are set out in Annex C of KCSIE.

In addition to their formal training, the DSLs' knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSLs in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSLs.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

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

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

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for all staff, pupils, parents, and carers.

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching Children How to Keep Safe

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to support children to adjust their behaviours both inside and outside of School in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationships and Sex Education.

Filtering and monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system.. In school, all internet access is protected by Smoothwall, which blocks access to unsuitable websites, including those with terrorist and extremist material.

Such systems aim reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks and the School's IT arrangements, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by¹⁸⁷;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

As part of the computing curriculum, pupils are taught about the safe use of the Internet. Time is spent on subjects such as 'deception awareness' training and pitched on an age appropriate basis. In particular, pupils in Years 5 and 6 are taught about subjects such as the use and impact of social media. Pupils are taught how to use IT systems in accordance with the School's Acceptable User Policy.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online. The Head of Computing arranges annual briefings for parents at which information about safe use of the internet is shared. Topics covered include the internet and risks of bullying, grooming and radicalisation and will reflect topics covered in the curriculum. Further detail of the School's approach to online safety can be found in the School's E-Safety Policy Acceptable Use of IT policy and Digital Camera and Mobile Phone Policy, which supplements its Safeguarding Policy. These policies also include detail on

the use of mobile technology in School and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems. Pupils and parents are required to sign a Computing Agreement and Code of Conduct.

Relationships and Sex Education (RSE)

RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE.

RSE forms part of the School's PSHE programme.

Arrangements for safeguarding issues away from School or out of School hours

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

Looked after children

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

The DSLs are the designated members of staff who have responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Homestay and hosting during exchange visits

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

Private fostering arrangements

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

Arrangements for visiting speakers

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

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

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

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

Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that a DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022) and '*After school clubs, community activities, and tuition (safeguarding guidance for providers)*' (September 2023).

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Sarah Lee, DSL is the designated safeguarding lead for the School's Early Years setting. Her contact details are set out in this Policy.

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment and Selection Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age

groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Use of mobile phones and cameras

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

Duty to notify Ofsted

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

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

COMPLAINTS

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

RELATED POLICIES

Anti-Bullying Policy
Attendance Policy
Acceptable Use of IT Policy
Complaints Policy
Digital Camera and Mobile Phone Policy
E Safety policy
Preventing Extremism and Radicalisation Policy
Recruitment Policy
Staff Code of Conduct
Whistleblowing Policy

Policy reviewed July 2024

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (and DDSL), should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as “extra-familial harm.’ Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.²¹⁴

All staff should be aware that **children with disabilities** are 3 times more likely to be abused than their peers. **In all cases, if staff are unsure, they should always speak to the DSL (or DDSL)**

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.²¹⁶

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is

not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.² Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

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

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

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

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.²²³

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. The sharing of

nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

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

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
- children and young people selling nudes or semi-nudes of others online
- children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
- children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) sets out the classification of incidents, and how each should be handled.

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

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

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

violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.²²⁶

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger.²²⁷ Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting.²²⁸ Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

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

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

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

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

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

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

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

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other

resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

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

Some of the following can be indicators of CCE:

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

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

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

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

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

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

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

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

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

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance “*Modern slavery: how to identify and support victims (May 2022)*”.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL {or DDSL} who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

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

teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School's local safeguarding procedures.

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

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. 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 18th 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.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

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

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.²⁴⁶

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL (or the DDSL,) who should be aware of the local procedures in place, before making a Prevent referral.

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

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

These can include:

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

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

Lesbian, gay, bisexual or gender questionin : A child or 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 pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in *KCSIE*), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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

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

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

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

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

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

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

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

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

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority where the child is normally resident of any pupil who fails to attend school regularly, or has been

absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

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

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

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

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

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

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

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

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

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.