

CHEPSTOW HOUSE



All School Policy for Safeguarding

September 2018 - August 2019



Safeguarding Policy

Preface

We recognise the paramount importance of our role in the wider safeguarding system¹ for children². Our policy has been developed in consultation with experienced and expert staff and adopted by the Governors (see contact details on the next page). The policy is reviewed annually, or immediately in the event of changes to guidance. Effective implementation and adherence to the policy is reviewed through an annual cycle of governance review visits.

As detailed throughout this document, our policy complies with relevant statutory and non-statutory guidance, including [Keeping Children Safe in Education \(KCSIE\)](#) 2018. The policy applies wherever staff are working with children, including when this involves being off-premises.

Recognising that safeguarding is the responsibility of **everyone** within the organisation, we ensure that mechanisms are in place to assist all members of staff³ to understand and discharge their responsibilities, and that they are appropriately and regularly informed and trained. All staff are obliged to make an annual affirmation statement that they have read and understood this policy and Part 1 of KCSIE. School leaders and staff who work directly with children should also read Annex A of KCSIE.

Our policy is available to parents on request and is published on our website.

This policy should be read in conjunction with our other policies that concern the welfare of children, which are listed below in Section A under the sub-heading: **The scope of welfare.**

Primary person responsible for implementation and monitoring of this policy	<p>Designated Safeguarding Lead: Lucy Ritchie Assistant Head Pastoral (School) Telephone: 0207 2430243 mob:07785627535 Email: lucy.ritchie@chepstowhouseschool.co.uk</p> <p>Designated Safeguarding Lead: Gill Whiteside (Nursery) Telephone: 0207 2430243 Email: gill.whiteside@chepstowhouseschool.co.uk</p> <p>Deputy Designated Safeguarding Lead: Angela Barr (School and Nursery) Telephone: 0207 2430243 Email:angela.barr@chepstowhouseschool.co.uk</p>
Review date:	June 2018
Adopted:	September 2018
Next Review:	June 2019

¹ As outlined in [Working together to safeguard children \(2018\)](#)

² Legally speaking, a child is someone who has not yet reached their 18th birthday, but in practice this policy applies to *all* young people studying, or living within Alpha Plus Group establishments.

³ In this document, any reference to 'staff' includes part-time employees, volunteers, contractors and governors.



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Key Contact Details

Chepstow House contacts

Lucy Ritchie (DSL School/Nursery) – Telephone: 0207 2430243 mob:07785627535

lucy.ritchie@chepstowhouse.co.uk – Available in term and out of term time

Gillian Whiteside (DSL Nursery) – Telephone: 0207 2430243 gill.whiteside@chepstowhouse.co.uk –

Available term time

Angela Barr (Deputy DSL) - Telephone: 0207 2430243 angela.barr@chepstowhouse.co.uk – Available term time

Both the Designated Safeguarding Leads and the Deputy Designated Safeguarding Lead are always available (during school hours) for staff in the school to discuss any safeguarding concerns.

During out of hours/out of term time, Lucy Ritchie (DSL School/Nursery) continues to be available via telephone/email. If the Designated Safeguarding Lead is unavailable staff will contact external services directly with any concerns using the contact details below. The DSL should be informed as soon as possible.

Governance – The Alpha Plus Group Ltd <http://www.alphaplusgroup.co.uk/AboutUs/Governors/>

Governor contact details:

- Liz Francis (Nominated lead) – 0207 487 6000; liz.francis@alphaplusgroup.co.uk
- Mark Hanley-Browne (CEO) – 0207 487 6010; MHB@alphaplusgroup.co.uk
- Sir John Ritblat (Group Chairman) – 0207 448 1960; john.ritblat@delancey.com

Alpha Plus Group Ltd, 50 Queen Anne Street, London W1G 8HJ


enquiries@alphaplusgroup.co.uk

External services

<p>Designated officers at the local authority</p>	<p>Bi Borough Safeguarding and Child Protection in Schools and Education Hilary Shaw M: 07817 365 519 hilary.shaw@rbkc.gov.uk</p> <p>Angela Flahive M: 07971 320 888 angela.flahive@rbkc.gov.uk</p>
<p>Family Support and Child Protection Advisor</p>	<p>Alexandra Handford T: 0207 598 4638</p>



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	<p>M: 07980 742708 Alexandra.handford@rbkc.gov.uk</p>
Local safeguarding children board (LSCB)	<p>Town Hall, Hornton Street London W8 7NX T: 0208 753 3914 hflscb@lbhf.gov.uk</p>
Local authority designated officer (LADO)	<p>Kembra Healy Bi Borough Safer Organisations Manager and LADO Tel: 07522 217 314 Email: kembra.healy@lbhf.gov.uk Kensington and Chelsea: Make LADO referrals to the following phone numbers/emails depending on the borough where the incident took place or where the employing agency is. The referral form to complete is embedded below. If unsure, send it in. Referrals are dealt with by Child Protection Advisors who hold delegated LADO powers across all three boroughs.</p> <p>London Borough of Hammersmith and Fulham: 020 8753 5125/ LADO@lbhf.gov.uk Westminster: 020 7641 7668/ LADO@westminster.gov.uk Kensington and Chelsea: 020 7361 3013/ KCLADO.Enquiries@rbkc.gov.uk</p> <p> LADO Referral Form.docx</p>
Bi Borough (Hammersmith & Fulham and Royal Borough Kensington & Chelsea) PREVENT – Advice, guidance, training queries and referrals to Channel Panel:	<p>Jake Butterworth – Bi Borough Prevent Schools & Colleges Officer – Counter Extremism Direct Line: 020 8753 5843 jake.butterworth@lbhf.gov.uk Secure Email: jake.butterworth@lbhf.gcsx.gov.uk</p>
Bi Borough Admissions and Access to Education (Children Missing Education, Child Employment/Licensing Children in Entertainment and Elective Home Education enquiries):	<p>Wendy Anthony - Bi Borough Head of Admissions and Access to Education Direct Line: 020 7745 6440 wendy.anthony@rbkc.gov.uk</p> <p>Douglas Shaw - Bi Borough Head of Admissions</p>



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	<p>Direct Line: 020 7745 6445 douglas.shaw@rbkc.gov.uk</p> <p>Paul Worts – Senior Exclusions Officer</p> <p>Direct Line: 020 7745 6614 paul.worts@rbkc.gov.uk</p> <p>Alisha Benning – Elective Home Education (EHE) and Children Missing Education (CME) Lead for Kensington and Chelsea</p> <p>alisha.benning@rbkc.gov.uk</p> <p>Filiz Bayram – Elective Home Education (EHE) and Children Missing Education (CME) Lead for Westminster</p> <p>Direct Line: 020 7641 1381 fbayram@westminster.gov.uk</p> <p>Latoya Dyett – Child Employment and Licensing [Children in Entertainment] Officer</p> <p>Direct Line: 020 7745 6612 ldyett@westminster.gov.uk</p>
Police	<p>For emergencies call: 999 For non-emergencies call: 101</p>
Preventing extremism in schools and children's services helpline	<p>Call 020 7340 7264 Email counter.extremism@education.gov.uk</p>
Professionals Online Safety Helpline (UK Safer Internet Centre)	<p>Call 03443814772 Email helpline@saferinternet.org.uk</p>
NSPCC Whistleblowing Advice Line	<p>Call 0800 028 0285 Email help@nspcc.org.uk</p>
Disclosure and Barring Service (DBS)	<p>Helpline: 03000 200190 Barring referrals: dbsdspatch@db.s.gsi.gov.uk PO Box 181, Darlington DL1 9FA 01325 953 795</p>



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NB - The following acronyms/terms are used in this document, and often within safeguarding discourse:

DSL – Designated safeguarding lead
CSC – Children’s social care
LSCB – Local safeguarding children board
FGM – Female genital mutilation

CSE – Child sexual exploitation
KCSIE – Keeping Children Safe in Education
WT – Working Together (to Safeguard Children)
FBV – fundamental British values



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'Prevent' – the duty to have due regard to the need to prevent children from being drawn into terrorism

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Chepstow House Ethos

In a happy and purposeful family environment, where every member of the school community is important and all are valued as individuals, Chepstow House aims to discover the best in every child and challenge them to go beyond their expectations.

Chepstow House will deliver the highest quality, independent education in a co-educational environment.

Chepstow House is a centre of learning excellence, where children can develop as well-rounded individuals, while growing and interacting as part of a community that promotes a spirit of collaboration, collective accountability and responsibility.

PART A – PRINCIPLES AND RISKS

Principles of safeguarding and welfare

Children have a right to be safe, and to feel cared for and supported. Adults have a responsibility to protect children. The safeguarding of children and the promotion of their welfare is a simple and uncontested priority of society, and is of paramount importance to us.

Although the principles of safeguarding may be simple, the perceptions of the threats to the welfare of children are broad, complex, and sometimes poorly-understood. They are also subject to ever-increasing public concern, government guidance and regulation. Such breadth and complexity create an environment, which can be challenging for all those working in education, and for parents.

In response, this policy aims to provide a holistic framework, which defines the types of risk that pose a threat to the welfare of children in education, and explains:

- how we assess and respond to those risks
- what expectations we have of ourselves, and of parents
- what procedures should be followed to identify children who may be vulnerable
- what must happen when a specific concern or disclosure arises
- what other channels and specialist resources are available for children and parents

In doing so, we follow prevailing statutory duties and guidance⁴, and we fully embrace the value of working together with local authorities and agencies in order to keep children safe.

The scope of welfare

Safeguarding and promoting the welfare of children is defined by KCSIE 2018 as:

- protecting children from maltreatment;

⁴ including: [Children Act 1989](#) and subsequent amendments; [Education Act 2002](#); [Keeping Children Safe in Education KCSIE](#) (2018); [The Education \(Independent School Standards\) Regulations 2014](#); [Working Together to Safeguard Children](#) (2018); [Information Sharing](#) (July 2018); [Statutory framework for the early years foundation stage](#). Other guidance is referenced as appropriate in subsequent footnotes.



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- preventing impairment of children’s health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

Welfare also includes children’s feelings of being valued, supported, respected and listened to. This is especially relevant when their individuality and differences are not being respected. Such differences might be cultural, racial, religious, or based on special needs or disabilities.

Staying alert and responsive to these aspects of welfare, and providing early help as soon as a problem emerges, are at the heart of everything we do to keep children safe. We take a child-centred approach, meaning that we consider at all times what is in the best interests of the individual child, taking action to enable all children to have the best possible outcomes.

With such a broad scope, it is impossible to address all aspects of welfare exclusively within one policy. Therefore this policy should be read in conjunction with our other policies which directly or indirectly address welfare including

- Behaviour and discipline
- Staff code of conduct
- Ethical and professional conduct (Alpha Plus Group policy)⁵
- Anti-bullying, which includes cyber-bullying
- The E-Safety ‘suite’⁶ including ICT Usage, Mobile phones and other electronic devices, Cameras, photos and images, and Social media
- Personal, Social, Health and Economic Education (PSHE). This also incorporates the spiritual, moral, social and cultural (SMSC) development of children, and Sex and Relationship Education (SRE)
- Special Educational Needs and Disability (SEND)
- Health and safety
- Educational visits and risk assessments
- Whistleblowing policy, which explains the process for disclosure of malpractice
- Recruitment policy
- Missing pupil procedures

Identifying risks to the welfare of children

Risks can arise from many different sources and be categorised in a number of different ways.

The source of a risk may be from people known to the child and in close physical proximity, or it may be more remote and anonymous, including via the internet⁷. The risk may be from adults, including family members, teachers or other professionals. It may also be from other children (e.g. bullying) and staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.

⁵ This contains the single process via which all staff must make an annual affirmation that they have read and understood their school/college safeguarding policy, KCSIE and other key policy documents.

⁶ These policies cover the use of mobile phones and cameras in the Early Years Foundation Stage, as required by [The EYFS Statutory Framework](#)

⁷ These risks and our related controls and procedures are covered extensively by our E-safety and ICT usage policies.



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A risk to welfare may also manifest itself through a child harming itself, whether consciously or otherwise.

Staff should consider 'contextual safeguarding', which means they should consider whether wider environmental factors (for example, the child's peer group) may affect a child's vulnerability, posing a threat to their safety and/or welfare. They should also be alert to behaviours that can put children at risk of harm. For example, behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

All children are potentially at risk, but children with disabilities or special educational needs are especially vulnerable. They are more prone to peer group isolation; can be disproportionately impacted by behaviours such as bullying; and have communication barriers, which may inhibit them from reporting abuse. Staff should also be alert to the fact that indicators of abuse may be interpreted as part of a child's disability.

Being sensitive to the indicators of risk is central to our culture of safeguarding, and underpins the induction of staff, and ongoing awareness building and training of staff. Risk indicators, which help staff identify vulnerability of children to various categories of harm or abuse, are included in Appendix 2 and 4.

Harm and abuse – definitions and categories

Threats to the welfare of children tend to be described using the words 'harm' or 'abuse'.

The Children Act 1989 defines **harm** as ill-treatment or impairment of health or development, where:

- *ill-treatment* includes sexual abuse and forms of ill-treatment which are not physical
- *health* means physical or mental health
- *development* includes physical, intellectual, emotional, social, or behavioural development

A child may also suffer harm from seeing or hearing the ill-treatment of another.

KCSIE defines **abuse** as 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. Abuse can be profoundly damaging, and can blight the remainder of a child's life. Abused children sometimes become abusing adults themselves. Child abuse usually exists in a world of secrecy and silence, and the cycle of abuse must be broken, not only to prevent serious injury (or even death), but also so that children can grow up to be well-adjusted adults.

Amongst the agencies who work with children, four categories of abuse are recognised under which a child may be assessed as having suffered, or being likely to suffer harm. These four categories are:

1. Physical abuse (which includes female genital mutilation 'FGM' and 'honour-based' violence)
2. Emotional abuse
3. Sexual abuse (which includes child sexual exploitation 'CSE')
4. Neglect (which includes 'children missing from education')

Detailed descriptions of these four categories of abuse are included in appendix 1, and risk indicators that can help staff to recognise them are included in appendix 2.



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Whilst not an accepted category of abuse in its own right, the vulnerability of children to being seduced by extreme ideological positions is something we take very seriously. Appendix 3 contains an explanation of the threat of young people being drawn into terrorism, including the statutory 'Prevent Duty', which applies to those working in schools and colleges.

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

Duty of Staff

All schools and colleges have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

The early identification of potential problems, and the provision of early help, relies upon the following general expectations, which apply to all staff at all times. Staff must ensure that they:

- Are vigilant and open-minded, and maintain the attitude 'it could happen here'
- Regularly encourage all children to share any concerns they have with an adult and they must listen sympathetically, taking any allegations seriously
- Always act in the best interests of the child
- Understand the systems and processes that support the welfare and safeguarding of children in the school, and **always** seek clarification if anything is not clear to them.
- Are able to identify children who may be in need of additional help, and respond in appropriate ways consistent with our SEND policy, and with the Common Assessment Framework (CAF) and Team Around the Child (TAC) approach⁸.
- Are familiar with the indicators of various types of child abuse (see appendix 1 and 2 which describe the different forms of harm and abuse in more detail)
- Report suspicions of child abuse and any concerns about a child's welfare immediately, in line with the procedures in this policy
- Have received appropriate child protection training on induction, and at appropriate intervals thereafter. Guidelines are provided in this policy. Whilst it is one of the DSL's responsibilities to ensure that staff have received the appropriate level of training, staff-members have a reciprocal responsibility to check with the DSL if they are unsure about their training requirements, or feel that they need further training.

⁸ CAF and TAC refer to standardised approaches to conducting an assessment of a child's additional needs, and deciding how those needs should be met, where necessary involving a team of professionals working together with the family to address the child's needs in a holistic way. S.17 of the Children Act 1989 defines a child in need as one (a) being unlikely to achieve or maintain a reasonable standard of health or development without the provision of services by a local authority; (b) whose health or development is likely to be significantly impaired without the provision of such services; or (c) is disabled.



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- Recognise their responsibility to raise concerns⁹ about poor or unsafe practice and potential failures in the school safeguarding regime, and to follow-up if such concerns are not taken seriously by the senior leadership team.

Duty of parents

This policy focuses on the duties and the responsibilities of the educational establishment, but it is also worth stating briefly our expectations of parents. Parents are expected to help their children to behave in non-violent and non-abusive ways towards both staff and other pupils. Parents will be informed if it was necessary to use reasonable force¹⁰ to protect a pupil from injury or to prevent a pupil from harming others.

Parents should always inform the school of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the school of any changes in home circumstances, such as the death of a member of the family, separation or divorce that might lead to otherwise unexplained changes in behaviour or characteristics.

⁹ Please refer to the [Whistleblowing policy](#), available on the Alpha Plus Group Portal. Staff can also use the [NSPCC whistleblowing advice line](#) if they do not feel able to raise concerns about child protection failures internally

¹⁰ As defined in government guidance '[Use of reasonable force in schools](#)'. Where the incident involves children with SEN or disabilities or with medical conditions, the school will consider the risks carefully and recognise the additional vulnerability of these groups.



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PART B – RESPONDING TO THE DISCOVERY OR DISCLOSURE OF A SAFEGUARDING CONCERN¹¹

Concerns

Safeguarding concerns can arise in a variety of ways. Staff may become concerned by direct observation, general chatter, or the behaviour of a colleague, or a child's caregiver. Information might be received from another child, an internet user, or via a support service such as ChildLine. Changes in a child's appearance or behaviour might trigger concerns or unusual physical injuries to a child may become noticeable. It is important to note any patterns of indicators, which could be indicative of an underlying concern.

Staff should not wait for a disclosure nor should they assume that another professional will take action. If staff have any concerns about a child's welfare they should act on them immediately, as per the procedures outlined in this policy.

Disclosures

Children rarely make direct disclosures; however, if a child (either as a victim or as a third party) asks to speak with a staff-member about anything relevant to safeguarding concerns, it is essential that they are listened to and taken seriously and that their disclosure is treated discretely and sensitively.

Staff must never promise confidentiality, nor tell the child that they will keep a secret. However, they should be clear that they will only tell those who need to be involved to protect the child's welfare.

The staff-member should listen sympathetically and carefully right to the end of what the child has to say. The child may have been struggling with this decision for days or weeks, and may have had to summon up tremendous courage to come forward. Therefore, however uncomfortable the details, the child should not be stopped mid-account nor be told that they need to speak to someone else. Avoid taking notes while the child is speaking, as this can put unhelpful pressure on the child by formalising the situation.

As a fundamental principle children should be given a fair hearing and taken seriously. Even if the staff-member suspects the child's disclosure is implausible, fanciful or malicious, they should continue to listen carefully, without betraying any hint of scepticism or asking any leading questions.

It is not the role of school staff to investigate reports of abuse. It is their role simply to gather sufficient information to be able to make a preliminary decision about how to proceed. For this reason alone, staff-members listening to disclosures from children can, when necessary, gently ask questions for basic clarification of the facts such as "what?", "when?" and "where?". However, they should be careful not to invite the child to speculate about motive as this might undermine any criminal investigation, and can prejudice outcomes.

At the end of the disclosure, the staff-member should reassure the child that they have done the right thing, and offer a guarantee that the information will be taken seriously. The child should be reassured that the matter will be dealt with by experienced, caring people who operate with the

¹¹ The [KCSIE \(2018\) flowchart \(see page 13\)](#) gives a visual summary actions to be taken. [What to do if you are worried a child is being abused - Advice for practitioners](#) (2015) provides more information.



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greatest discretion. The child should also be advised that they will be kept informed of the progress of the disclosure, and their wishes and feelings taken into account in responding to the matter.

As soon as possible, the staff-member should write a comprehensive note of all that has been said, using the child's words as far as possible. The record should be signed with a time and date and shared with the DSL or Deputy as per the procedures detailed in the following sections.

Taking action

If staff have *any* safeguarding concerns or a disclosure is made they should speak to their designated safeguarding lead (DSL) or Deputy DSL without delay (see the contact details on page 2). Taking into account the nature, content and context of the concern/disclosure the DSL or Deputy DSL will determine a course of action in line with LSCB guidance. This may include:

- 1) Providing support for the child internally via pastoral processes
- 2) An early help assessment
- 3) A referral to children's social care (and if appropriate the police¹²). **This must be made immediately where a child is suffering or is likely to suffer from harm**

Further detail on each of these points can be found below.

The DSL (or Deputy) should always be available to discuss safeguarding concerns. In the exceptional circumstance that you cannot make contact, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team (see page 3 for contact details). Note also that any staff member can refer their concerns to children's social care directly (see point 3 below).

In any event, the DSL (or Deputy) should be informed as soon as practically possible.

1. Internal support

If a staff member has a pastoral/safeguarding concern the DSL will provide support, advice and possible actions. This will vary, depending on the nature of the disclosure. It will involve the DSL leading on creating, and implementing, an individual pastoral plan for the child. When appropriate, this will be shared with relevant staff members and parents. Internal support will be reviewed at regular intervals.

2. Early help¹³

Early help involves working with local agencies to provide targeted support to a child as soon as a problem emerges and at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. The DSL will generally lead on organising the assessment and liaising with other agencies. However, staff may be required to provide support, in some cases acting as the lead professional.

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

¹² The criteria regarding the involvement of the police is a context-driven judgment-call, but if the safety of the child is in any doubt, or it is believed that a crime has been committed, the police should be called. If the child requires urgent medical attention an ambulance should be called to take the child to hospital.

¹³ Further information can be found in Chapter 1 of [Working together to safeguard children](#) (2018)



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- Is disabled and/or has special educational needs, whether or not the child has an education, health and care plan
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is frequently missing from home and/or care
- Is misusing substances
- Is at risk of modern slavery, trafficking or exploitation
- Has difficult family circumstances
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child

If a child's situation does not appear to improve or is getting worse a referral to child's social care should be considered.

3. Referral to children's social care

The DSL will refer to children's social care (local authority) as soon as possible. If the DSL, or Deputy DSL, is not available then any staff member should report their concerns to the local authority directly.¹⁴

To make a referral, staff (DSL or other) should call the designated officer as listed at the beginning of this policy (page 3). Social services will guide staff through this process and may forward your call to relevant local authorities or supporting agencies. If staff make a direct referral, the DSL should be informed as soon as possible.

The local authority will determine whether:

- the child is in need and should be assessed under section 17 of the Children Act 1989
- The child is at risk of significant harm and should be assessed under section 47 of the Children Act 1989

In all cases of referrals, the local authority should make a decision within one working day of a referral being made about what course of action they are taking, and must let the referrer know the outcome. This may include further specialist assessment and/or support from additional services. School staff should provide support as required.

The referrer should follow-up should appropriate information not be forthcoming. Thereafter they should press for re-consideration if the child's situation does not appear to be improving. If there are concerns around the referral process the DSL should contact the Bi-Borough Safeguarding and Child Protection in Schools and Education directly (page 2).

The DSL will enter into a preliminary discussion with the parents, but only if there is no risk to the child of further harm resulting out of this action. Any such decision will be made with the support of children's social care. The DSL should seek to ascertain any possible additional information or explanations of the indicators which have given rise to a suspicion or allegation. These discussions are exploratory, and the DSL should be careful not to prejudice the outcome of any potential multi-agency investigation.

¹⁴ Further information can be found at <https://www.gov.uk/report-child-abuse>.



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Information sharing¹⁵

Information sharing is vital in identifying and tackling all forms of abuse. The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; however, they do not prevent, or limit, the sharing of information for the purposes of keeping children safe. **Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.**

The Data Protection Act 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share special category data¹⁶. Be open and honest about why, what, how and with whom information will, or could be shared and seek the individual’s agreement, unless it is unsafe or inappropriate to do so. Information can be shared legally without consent if the staff-member is unable to gain consent, cannot be reasonably expected to gain consent, or if to gain consent could place a child at risk.

Ensure that any information shared is necessary, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. A record should be kept of who information has been shared with and why. If in doubt consult with your DSL or Deputy DSL. Information sharing is vital in identifying and tackling all forms of abuse.

Record keeping

All concerns, discussions and decisions made, the reasons for those decisions, and any actions taken, should be recorded in writing. This is currently done on a written Pastoral Concern Form. An online system to record concerns will be used from the Spring Term 2019.

Following through on a concern

Although it is usually not possible to discuss child protection cases in full, a member of staff who has passed on information to their DSL or Deputy DSL should expect an acknowledgement and a brief and confidential update on progress or outcome. Members of staff who are dissatisfied with the manner in which concerns have been handled, or believe that a child is still at risk and continuing to suffer should escalate their concerns. This could be by discussing the issue further with the DSL or Deputy DSL or seeking advice from RBKC safeguarding advice team or challenging other agencies and professionals regarding their actions (or inaction) as appropriate.

Female Genital Mutilation (FGM) mandatory reporting duty for teachers

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

Whilst all staff should speak to their DSL or Deputy if they have any concerns regarding FGM, there is a specific legal duty on teachers. If, in the course of their work in the profession, a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they **must** report this to the police. For further details on FGM see Appendix 1 of this document and [Annex A of KCSIE \(2018\)](#).

¹⁵ For further information, see [Information sharing: advice for practitioners providing safeguarding services \(July 2018\)](#), which contains a myth-busting guide to information sharing.

¹⁶ Defined as personal and sensitive data



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Concerns and allegations about another member of staff

If a disclosure, or any other evidence, reveals possible safeguarding concerns about any staff members then this should be referred to the Head

Where there are concerns/allegations about the Head, this should be referred to the nominated Lead Governor for Safeguarding (see page 2 of this document for contact details).

Further details about how an allegation should be handled can be found in Appendix 6.

Allegations of abuse made against other children¹⁷

All staff should be aware that safeguarding issues are not confined to instances where children are harmed by adults but can also manifest themselves via peer on peer abuse, such as bullying (including cyberbullying), physical abuse, sexual violence and harassment, sexting¹⁸, initiation/hazing type violence and rituals.

Support and sanctions will be considered on a case-by-base basis. In some cases, pupils will be dealt with under the school's behaviour and anti-bullying policies. However, this safeguarding policy and the procedures outlined above will apply to any allegations that raise safeguarding concerns. If in doubt, staff should consult with the DSL or Deputy DSL.

Staff must be clear that abuse is abuse and should never be tolerated or dismissed as 'banter' or 'part of growing up'.

In cases of sexual violence and harassment¹⁹:

- **Immediate** consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). As part of this, consideration should be given to the proximity of the victim and perpetrator in school. The victim should also be invited to choose a designated trusted adult they can talk to about their needs
- The DSL will carry out and record a risk and needs assessment, considering all involved/impacted. The needs and wishes of the victim should be paramount and the DSL will consider these alongside the victim's age and their developmental stage, the nature of the allegations, and the potential risk of further abuse
- Where a report is made to the police, the DSL will agree with the police what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

We will minimise the risk of peer on peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour

¹⁷ In-depth guidance can be found in [Part 5 of KCSIE](#) and in [Sexual violence and harassment between children in schools and colleges](#)

¹⁸ For further guidance, see [Searching, screening and confiscation advice for schools](#) and UKCCIS [Guidance on sexting](#). Any evidence of an offence or material that contains a pornographic image of a child should not be deleted and the device should be given to the police as soon as possible.

¹⁹ Descriptions of this type of abuse can be found in Annex 1



Safeguarding Policy

- Being alert to the fact that some groups (such as girls, children with SEND and LGBT children) are at greater risk of sexual violence and harassment
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff. This should be highlighted in PSHE lessons, NSPCC workshops and Safeguarding/bullying assemblies.

Conflicts of interest

All adults who work within an educational context have a duty to report promptly any concerns or information about possible child abuse, whether those responsible are thought to be other children, adults, or colleagues. Our commitment to the paramount importance of the welfare of the child means that in both principle and practice it takes precedence over any other concern, relationship or reputation. Pupils cannot be expected to raise concerns if they are aware of staff failing to do so. Those who do not report information quickly could put children at risk and bring the school into disrepute, and may face disciplinary action.



Safeguarding Policy

PART C - THE MANAGEMENT OF SAFEGUARDING

Working Together

We contribute to multi-agency work in line with statutory guidance [Working Together to Safeguard Children](#). This includes a co-ordinated offer of early help when additional needs of children are identified and contributing to multi-agency assessments and plans to provide additional support to children subject to child protection plans. Access is allowed from the host local authority, and where appropriate, from a placing local authority. As outlined above, fears about sharing information are not allowed to stand in the way of the need to promote the welfare and protect the safety of children.

We take into account the procedures and practices of the local authority as part of the multi-agency safeguarding procedures set up by the LSCB, and co-operate with all relevant partners and other organisations who are engaged in activities relating to the welfare and safeguarding of children.

The role and responsibilities of the Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and child protection (including online safety). It is apparent from the procedures outlined throughout this policy that great reliance is placed upon all staff sharing information and referring their concerns to the DSL. This, in turn, puts great reliance on the DSL to carry out their role thoroughly and diligently.

As a member of the Senior Leadership Team, the DSL must ensure they have appropriate status, authority, time, funding, training, resources and support to fulfil their responsibilities. They must consult the Head, and if necessary the nominated governor, if they feel that this is not the case. There must always be cover for the DSL role, in the form of a Deputy DSL, who must be trained to the same level as the DSL. Though *activities* may be delegated to the Deputy DSL, the ultimate responsibility remains with the DSL.

The DSL and Deputy's role and responsibilities must be explicitly recorded in their job descriptions.

The duties and objectives of the DSL include:

- providing advice and support to staff on child welfare and child protection matters
- taking lead responsibility for online safety, including supporting pupils with SEND to stay safe online
- gathering and collating information on alleged safeguarding incidents, seeking clarification from alleged perpetrators or victims
- managing the referral process (see more below)
- keeping parents informed (wherever possible and if appropriate) and sharing with them any reports concerning their child



Safeguarding Policy

- keeping the Head informed of all significant safeguarding matters
- understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- undergoing their own training updates (see more below)
- liaising with designated officers at the local authority and other local agencies in line with [Working Together to Safeguard Children](#)
- consulting on the design of the PSHEE policy and relevant curriculum components of welfare and safeguarding.
- for 'looked after' children, ensuring that appropriate staff have relevant information about care needs and contact arrangements. Staff should also be aware of previously looked-after children and have the skills, knowledge and understanding to provide support.
- raising awareness of safeguarding matters generally (see more below)
- in conjunction with the governors, ensure the safeguarding policy is reviewed annually for effectiveness and for compliance with latest legislation, or updated sooner where necessary

Managing referrals

In particular the DSL is expected to:

- Be aware of the early help process and the referral threshold criteria of the relevant Local Safeguarding Children's Board (LSCB).
- Refer all cases of suspected abuse to the local authority children's social care and:
 - The designated officer for child protection concerns (all cases which concern a staff member),
 - Disclosure and Barring Service (cases where a person is dismissed, re-deployed or has left due to risk/harm to a child); and/or
 - Police (cases where a crime may have been committed)
 - the Channel programme where there is a radicalisation concern
- If the referrals listed above are made by other staff, the DSL should support those staff in the process
- Keep detailed, accurate, secure written records of concerns and referrals.
- Liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.



Safeguarding Policy

Raising Awareness

The DSL should ensure that safeguarding policy and procedures are known and used appropriately:

- Ensure this safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Liaise with the LSCB to ensure awareness of local multi-agency procedures, local referral procedures and training opportunities, and maintain a list of local multi-agency contacts.
- Where children leave the school or college 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 DSL should also consider if it would be appropriate to share any information in advance of the child leaving.

Training for the DSL

The DSL and Deputy DSL should receive appropriate training and updates in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of multi-agency collaboration and 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 safeguarding policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures that may be put in place to protect them.

Formal training should be at an advanced level as appropriate to the role and updated every two years. The DSL and Deputy should also access continuing professional development updates (e.g. via e-bulletins, meetings, workshops, reading) at regular intervals (minimum annually) to keep up with developments relevant to their role.

For further details, consult [Annex B of KCSIE](#).



Safeguarding Policy

Training for staff (including Head)

All staff are provided with our safeguarding policy and KCSIE (Part 1, and Annexe A where they work directly with children) as part of their induction programme. They are required to affirm **annually** that they have read and understood these documents. Induction training also covers the identity and function of the DSL and Deputy, the behaviour policy, the staff code of conduct, the safeguarding response to children missing in education and whistle-blowing procedures.

Child protection training updates (e.g. via email, staff meetings and e-bulletins) are provided regularly (minimum annually) in line with KCSIE and advice from the LSCB. Formal training is completed every 12 months, unless particular circumstances require greater frequency.

Training is relevant to staff roles and responsibilities, it includes:

- recognition and reporting of concerns immediately as they arise
- what to do if a child tells staff they are being abused or neglected, including appropriate levels of confidentiality, liaising with professionals (including the DSL and Deputy DSL), and never promising to a child that they will not tell anyone about an allegation
- identification of indicators of abuse and when it is appropriate to make a referral
- awareness of the process for making referrals to children's social care, and for subsequent statutory assessments, along with the role staff might be expected to play in such assessments
- a working knowledge of how the LSCB operates, the conduct of a child protection case conference and how to contribute to these effectively when required
- e-safety training
- 'Prevent' training

The School will make an assessment of the appropriate level and focus for staff training and will be responsive to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health. It will also ensure that staff have the skills, knowledge and understanding to keep looked after and previously looked after children safe. Responsive training may take the form of updates via email, staff meetings or online training.

Teaching pupils about safeguarding

The school utilises many different opportunities to teach pupils about safeguarding, as outlined below:

- PSHE lessons
- Relationship and Sex Education
- Class Circle Time
- 'Keeping Safe' Assemblies i.e. bullying, internet safety, managing friendships
- NSPCC workshops
- Curriculum lessons i.e. Computing and online bullying

See relevant policies: Internet Safety, Anti-Bullying, Behaviour, Health and Safety Plan



Safeguarding Policy

Safer recruitment

The Alpha Plus Group and its schools and colleges operate 'safer recruitment' procedures as outlined in Alpha Plus Group's recruitment policy and in accordance with Part three of KCSIE (2018)²⁰.

We maintain a single central register containing a record of all appropriate checks on staff.

We also observe the requirement to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or re-deployed due to safeguarding concerns, or would have been had they not resigned.

Governance of the schools and colleges

Details of the Alpha Plus Group governors can be found on the Alpha Plus Group website (alphaplusgroup.co.uk) or by [clicking here](#).

The principles and processes of Alpha Plus Group governance can be found by [clicking here](#).

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

Safeguarding is monitored through an annual cycle of governance visits and each year the Lead Governor holds an in-depth review with the DSL, looking at:

- Training
- Child protection issues and concerns raised in the last academic year
- Incidents of bullying
- ICT safety incidents
- Feedback from pupil forums or survey on matters relating to well-being and safeguarding
- The effectiveness of inter-agency working
- Lessons learned

The Lead Governor also hosts regular forums for DSLs and Deputy DSLs across Alpha Plus Group, which explore safeguarding issues and updates.

²⁰ Comprehensive guidance on safer recruitment is available in [Part three of KCSIE](#)



Safeguarding Policy

Appendix 1

Categories of Abuse and Harm

Including first line responses

Physical abuse

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

Staff are reminded that children who have been physically abused will often go to some lengths to hide or cover-up their injuries, for example by wearing long clothing even in hot weather.

Female Genital mutilation and honor-based violence

Physical abuse also includes female genital mutilation (FGM), which is an extremely harmful practice and is illegal in the UK. Despite being an embedded practice in some cultures, FGM is not a matter which can be decided by personal preference. Staff must be alert to the indicators that a child may be at risk of FGM, and must refer any suspicions to the DSL²¹. More information on FGM, including the Multi-Agency Practice Guidelines, indicators of imminent risk or post-FGM trauma, and measures the DSL should consider implementing to raise awareness of FGM are available on the government website: <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

So-called 'honour-based' violence (HBV) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage²², and practices such as breast ironing. It often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

Emotional abuse

Some level of emotional abuse will generally occur in all types of maltreatment. It may be defined as the persistent emotional maltreatment of a child such that it will cause severe and adverse effects on the child's emotional development. It may involve:

- a relationship with an adult which is inappropriate or grossly inconsistent.
- the persistent denial of love and affection.
- conveying that a child is worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person.

²¹ Section 5B of the Female Genital Mutilation Act 2003 (as inserted by s.74 of the Serious Crime Act 2015) places a **statutory duty on teachers (and others) to report to the police where they discover that FGM has been carried out on a girl under 18.**

²² For further guidance see <https://www.gov.uk/guidance/forced-marriage>



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- not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate, or making them feel stupid.
- suffering as a consequence of being persistently shouted at, or being used as a scapegoat.
- seeing or hearing the ill-treatment of another, such as the observation of serious bullying, or domestic violence, or exposure to extreme horror or violence through audio-visual media.
- 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.
- being a victim of serious bullying (including online or ‘cyberbullying’), causing the child frequent feelings of humiliation or fear for their safety.

This category of abuse may also involve the moral, economic, or ideological corruption of children. Such corruption could be for the purposes of gratification or criminality, or it might be ideologically motivated, for example through a child’s exposure to propaganda promoting extremist views²³.

Sexual abuse

Child sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in the production of, sexual images, ‘sexting’²⁴, 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.

Child sexual exploitation

Child sexual exploitation (CSE) occurs where an individual or group takes advantage of an **imbalance of power**²⁵ to coerce, manipulate or deceive a child into sexual activity:

- a) in exchange for something the victim needs or wants (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection), and/or
- b) for the financial advantage or increased status of the perpetrator or facilitator.

It does not always involve physical contact and can take place through technology. It can still be abuse even if the sexual activity appears consensual and can occur without the child’s immediate knowledge.

²³ Under section 29 of the Counter-Terrorism and Security Act (CTSA) 2015, staff have a statutory duty to have due regard to the need to prevent children from being drawn into terrorism. Details of how we apply this duty are explained further below.

²⁴ Sexting is when a person takes an indecent image of him/herself and sends it to another person/people via a mobile device. Most young people will not be aware of the consequences, including wider distribution of the image, and that they may be in criminal breach of Sexual Offences Act 2003 if they are younger than 16.

²⁵ For example, age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources



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Under the Sexual Offences Act 2003, it is an abuse of a position of trust, and thus a criminal offence, for a member of staff to 'groom' or engage in sexual activity with a pupil under the age of 18. The consent of the young person (or the agreement of a parent) is irrelevant. Furthermore, a relationship between a member of staff and a pupil *over* the age of 18, or a recent former pupil, is also deemed inappropriate, and will lead to questions about that member of staff's suitability for work in an educational context.

Neglect

Neglect is defined as 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.

Children missing from education

All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education is a potential indicator of neglect, and of other forms of abuse. As required by law, all schools need to have an admissions register and an attendance register. All pupils must be placed on both registers and attendance must be logged daily. Beyond general concerns of neglect arising from absences, all staff must be alert to the risks of potential safeguarding concerns triggered by children missing education such as: travelling to conflict zones, FGM and forced marriage.

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 under any of the grounds set out in the [Education \(Pupil Registration\) \(England\) Regulations 2006 \(as amended\)](#)²⁶.

Notification should be made as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All school must inform the local authority of any pupil who fails to attend 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 (or in default of such agreement), at intervals determined by the Secretary of State.

Where reasonably possible, schools and colleges should hold more than one emergency contact number for each pupil or student.

Specific safeguarding issues

Staff should be aware of the range of specific safeguarding issues. Additional information can be found in Appendix 5 of this document and Annex A of [KCSIE 2018](#).

²⁶ For further guidance see <https://www.gov.uk/government/publications/children-missing-education>



Safeguarding Policy

Appendix 2

Risk indicators of child abuse

Physical Abuse

- Injuries, bruises, burns, bite marks which are unexplained or implausibly explained
- Repeated injuries or requests to be excused through injury, illness
- Fear, watchfulness, over-anxiety to please
- Reluctance to get changed for sports etc.

Sexual abuse

- Comments about sexual activity
- Sexual knowledge, comments, behaviour inconsistent with a child of that age
- Unexpected reaction of fear or wariness to people
- Repeated urinary or genital infections
- Pregnancy/sexually transmitted diseases
- Genital trauma

Emotional abuse

- Withdrawn, anxious behaviour, lack of self-confidence. Mood swings.
- Challenging/disruptive/aggressive behaviour which is inconsistent with previous behaviour
- Self-harm and eating disorders
- Demanding or attention-seeking behaviour
- Unwillingness to communicate. Secretive and reluctant to share information
- Repetitive, nervous behaviour such as rocking, hair twisting or pulling

General indicators of abuse or neglect

- Poor attendance or frequent absences which are implausibly explained
- Deterioration in educational progress
- Parents show little interest in child's performance²⁷ or behaviour and are non-responsive or dismissive to professional concerns.
- The child's clothes are often dirty, scruffy or unsuitable for the weather
- No one seeks medical help when the child is ill or hurt
- Poor hygiene (smelly, dirty)
- The child is left alone with unsuitable carers
- The child is thin, pale, lacking in energy
- The child talks of running away
- Evidence of alcohol or other substance abuse
- Unexplained gifts of money
- Inappropriate behaviour displayed by other members of staff

Please note: this is not a comprehensive list. Staff should consult with the DSL or Deputy DSL if in doubt about any symptoms that might be indicative of abuse²⁸.

²⁷ Conversely, excessive interest from parents, along with unrealistic expectations of their child and evidence of pressure which is causing the child distress should also be given careful consideration.

²⁸ Additional information can also be found in Government guidance "[What to do if you're worried a child is being abused](#)" and the [NSPCC website](#)



Safeguarding Policy

Appendix 3

Ideological harm: radicalisation, extremism and the 'Prevent Duty'

Though not an accepted category of abuse in its own right, the vulnerability of children to being seduced by extreme ideological positions is something we take very seriously. Recent government legislation means that it is helpful to include here a summary of the 'Prevent Duty' for those working in education. For further information, the Department for Education has published advice for schools on the [Prevent Duty](#), 2015, and has launched a website [educate against hate](#).

Radicalisation refers to the process by which a person comes to support terrorism or extremist ideologies associated with terrorist groups. Consistent with the requirement to promote *fundamental British values*, all staff have a statutory duty to have due regard to the need to prevent children from being drawn into terrorism. In interpreting what is meant by 'due regard', we take guidance from the government's *Prevent* strategy, including the *Channel* programme, which aims to ensure that vulnerable children of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism. Success of this programme depends on effective communication and co-operation between staff, individuals, their families and (where appropriate) the local authority and other agencies.

Without undermining values such as freedom of speech, mutual respect and tolerance, all staff must respond to the ideological challenge of extremist views. 'Extremism' is defined as vocal or active opposition to *fundamental British values*, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and belief. The definition specifically includes calls for the death of members of our armed forces, whether in this country or overseas. It also includes the notion of *non-violent* extremism, which can create an atmosphere conducive to terrorism, and can popularise views which terrorists exploit. Extremism can take many forms whether ideological, political or religious. It can manifest itself explicitly and aggressively, for example through inciting hatred or a call to arms, or through more subtle and sophisticated channels of propaganda, including social media. These channels exploit aspirational images of success, status and belonging, and personal and moral duty which can capture the imagination of young minds.

Our classrooms are safe spaces where children can understand and discuss a wide range of sensitive topics, including extremism. In the process of promoting critical thinking, and in learning how to challenge terrorist ideologies, we recognise that staff may occasionally find themselves faced with a paradox. In an educational and developmental context, it is natural for children to want to explore and question different views and beliefs, some of which may, if only hypothetically or temporarily, challenge *fundamental British values*. Staff must exercise careful professional judgment in such cases, and above all, whether inside or outside the classroom, they must be particularly alert to risk-indicators of vulnerable children and, if appropriate, must seek further guidance. This is a complex and sensitive area, and over-simplified assessments can increase, rather than reduce risk.

There are five dimensions to the actions we take in response to the Prevent Duty:

- Risk assessment
- Working in partnership with local authorities
- Awareness raising amongst staff
- Protection from terrorist and extremist material when accessing the internet in school



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- Building resilience to radicalisation through the curriculum, e.g. through citizenship and religious education, and considerations for pupils' spiritual, moral, social and cultural (SMSC) development. These aspects are addressed through our PSHEE policy.

Specific tasks for the DSL relating to the Prevent Duty

The DSL should establish appropriate and proportionate measures to raise awareness of the Prevent Duty amongst staff and to achieve the following:

- assess the risk of children being drawn into terrorism. Document the risk assessment and any subsequent action plan. Prevent risk assessments are published on the Group Portal.
- ensure that safeguarding arrangements take into account the *Prevent* policies and procedures of the LSCB
- ensure that staff have training that gives them the knowledge and confidence to identify²⁹ children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism. As a minimum, the DSL should attend WRAP (Workshop Raising Awareness of *Prevent*) training where available, and be aware of the process for referring individual cases of vulnerability to the *Channel* programme, as opposed to local Children's Services in the normal way. The DSL should also liaise with local Prevent co-ordinators.
- ensure that there is appropriate supervision of visiting speakers to the school to prevent presentations (including the distribution of materials) which are contrary to fundamental British values
- the incorporation of any necessary syllabus amendments (e.g. in citizenship, history, politics, religious education)
- protection for children from terrorist or extremist material when accessing the internet

More guidance on the Channel programme is available here:

<https://www.gov.uk/government/publications/channel-guidance>

Guidance for schools on how terrorist groups such as ISIL use social media to encourage travel to Syria and Iraq is available here: <https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

For details of measures to minimise the risk of internet exposure to harmful material, refer to the ICT usage/Social Media policy.

²⁹ Where appropriate, staff should familiarise themselves with general risk indicators for vulnerability to being drawn into terrorism listed in Appendix 4



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Appendix 4

Risk indicators of being drawn into terrorism

NB references below to 'child' include all pupils.

Vulnerability

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

Access to extremism / extremist influences

- Is there reason to believe that the child associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?
- Experiences, Behaviours and Influences
- Has the child encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child come into conflict with family over religious beliefs/lifestyle/ dress choices?



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- Does the child vocally support terrorist attacks; either verbally or in their written work?
- Has the child witnessed or been the perpetrator/ victim of racial or religious hate crime?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child employed any methods to disguise their true identity? Has the child used documents or cover to support this?

Social Factors

- Does the child have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child experience a lack of meaningful employment appropriate to their skills?
- Does the child display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child demonstrate identity conflict and confusion normally associated with youth development?
- Does the child have any learning difficulties/ mental health support needs?
- Does the child demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child have a history of crime, including episodes in prison?
- Is the child a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child have insecure, conflicted or absent family relationships?
- Has the child experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child's life has extremist view or sympathies?

More critical risk factors could include:-

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

If you have any concerns discuss them with your DSL and local Prevent Officer.



Safeguarding Policy

Appendix 5

Hyperlinks to further information on specific safeguarding topics

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and the NSPCC website.

Local Safeguarding and Training advice can be found through Bi-Borough Safeguarding For Schools

- **Hilary Shaw** – Bi Borough Safeguarding in Schools and Education Officer

☎ Direct Line: 07817 365 519

✉ hilary.shaw@rbkc.gov.uk

- **Marissa Asli Bangura** – Bi Borough Safeguarding and Education – Liaison and Training Co-ordinator

☎ Direct Line: 07739 315 432

✉ marissa.aslibangura@rbkc.gov.uk

Schools and colleges can also access broad guidance on the issues listed below via the embedded links:

- bullying including cyberbullying
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- child missing from education
<https://www.gov.uk/government/publications/school-attendance>
- child missing from home or care
<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- county lines: criminal exploitation of children and vulnerable adults
<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- child sexual exploitation (CSE)
<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
- children and the court system
<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>
- children with family members in prison
<https://www.nicco.org.uk/>



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- domestic violence
<https://www.gov.uk/domestic-violence-and-abuse>
- drugs
<https://www.gov.uk/government/publications/drugs-advice-for-schools>
- fabricated or induced illness
<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>
- faith abuse
<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
- female genital mutilation (FGM)
<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>
- forced marriage
<https://www.gov.uk/forced-marriage>
- gangs and youth violence
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf
- gender-based violence/violence against women and girls (VAWG)
<https://www.gov.uk/government/policies/violence-against-women-and-girls>
- homelessness
<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>
- mental health
<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- private fostering
<https://www.gov.uk/government/publications/children-act-1989-private-fostering>
- preventing radicalisation
<https://www.gov.uk/government/publications/channel-guidance>
- sexting
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_1.PDF
- teenage relationship abuse
<https://www.gov.uk/government/collections/this-is-abuse-campaign>
- trafficking
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>



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Appendix 6

Concerns and allegations about staff

Once an allegation or concern about a member of staff has been passed onto the Head (or the Lead Governor for Safeguarding if the concern is about the Head) they should determine a course of action in line with LSCB guidance and with consideration to the welfare of the child.

Reasonable care must be taken to safeguard staff against the effects of false and malicious allegations; however, considerations of child protection must always be paramount. The Head or Lead Governor (as relevant) should contact the designated officer at the local authority as soon as possible, and within one working day, if it is believed that a member of staff has:

- Behaved in a way that has harmed, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children

The designated officer can provide advice and guidance in assessing the seriousness of any incident or allegation, help co-ordinate information-sharing with the right people, and monitor any investigation with the aim to resolve it as quickly as possible.

The Head or Lead Governor (if the matter concerns the Head) will coordinate any investigation with the local authority, the police and any other agencies that are involved, and will act as a channel of communication with the school. It would normally be the case that in the event of an allegation against a staff-member, which is likely to require full operation of the Child Protection Procedures, there will be multi-agency planning meeting, to which the Head/Lead Governor will be invited as relevant, and which will determine the appropriate action.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Reporting to Ofsted

In EYFS settings, a report must be made to Ofsted³⁰ of any allegation of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere). The notification should include action taken, and be made as soon as reasonably practicable, but at the latest within 14 days of the allegations being made. Failure to comply with this requirement constitutes a statutory offence.

Communication with the alleged abuser

After consultation with the designated officer, and if there are no objections from social care services or the police, the staff-member should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action.

The Head or Lead Safeguarding Governor (as relevant) must ensure that someone who is not involved in pursuing the allegation is available to provide the member of staff with personal support.

³⁰ In accordance with section 3.8 of the [EYFS Statutory Framework](#) (2017)



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This should be additional to ensuring the employee has the opportunity to contact their trade union or professional association.

Communication with outside parties

Beyond contact with those who need to know, it is extremely important that when an allegation is made, the school or college makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until a relevant authority publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

Following consultation with the designated officer and, where relevant, social services/the police, parents or carers of the child or children involved should be told about the allegation as soon as possible. They should be made aware of the requirement to maintain confidentiality.

Suspension

If a matter is referred for formal investigation under the Child Protection procedures, consideration should be given to suspending the employee until investigations have been completed. Suspension does not imply a finding of guilt but is intended to enable a dispassionate investigation of the facts, unimpeded by interpersonal tensions. Any employee who is suspended must be informed immediately for the reason for suspension. A member of staff suspended in such a context must not remain on the school premises. Where appropriate, alternatives will be considered such as redeployment or ensuring there is no contact with the child.

If the case is not referred under the Child Protection arrangements, but in the professional opinion of the Head or Lead Governor (as relevant) further action is necessary, then the allegation will be investigated under the Alpha Plus Group's Complaints Procedure. Any case of striking or otherwise physically chastising a child is at first sight a reason for disciplinary investigation, not least because corporal punishment (including the threat of using it) is contrary to Alpha Plus Group policy.

At any stage in the process, as soon as it becomes clear to the Head or Lead Governor (as relevant) that the conduct of the employee could be regarded as gross misconduct (i.e. conduct which if proven goes to the root of the contract of employment), then it is important that the employee is suspended. If this is not done, it could undermine the case for dismissal, because the employer has not immediately treated the alleged conduct as so serious as to require suspension. Clearly the decision on suspension will only be made once it is established there is a case to be investigated. So such action will only follow the initial gathering of the facts to determine that the alleged misconduct could have occurred, and that there is evidence which needs investigation. It must be re-emphasised that taking such action does not imply any finding of guilt.



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If the school is made aware that the Secretary of State has made an interim prohibition order in respect of a member of staff, immediate action should be taken to ensure that individual does not carry out work in contravention of the order.

Resolution of the investigation

Every effort should be made to resolve alleged cases of abuse so that they are not left open to widespread speculation, which can be damaging for all parties. The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file, and a copy provided to the person concerned.

If the case is substantiated a referral will be made to the Disclosure and Barring Service where³¹:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. This includes where an individual is deployed to another area of work that is not regulated activity, or they are suspended

The referral should be made as soon as possible after the resignation, removal or redeployment of the individual. It is recognised that it is a legal duty to refer and failure to do so when the criteria are met is a criminal offence. Any referral will be made in consultation with the designated officer.

In the case of a member of teaching staff, consideration will be given as to whether to refer the matter to the Teacher Regulation Agency³².

If a case is substantiated, the school will not enter into settlement or compromise agreements, and will refer to substantiated allegations in any reference provided for employment involving children or vulnerable adults. Cases, or a history of repeated concerns or allegations, which are proven false, unfounded, unsubstantiated or malicious will not be included in employer references

³¹ For further guidance and an explanation of the harm test see [Making barring referrals to the DBS](#)

³² For further guidance see [Teacher misconduct: referring a case](#)



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