



Safeguarding Policy

On 30 December 2020 the government announced that in order to help contain the community transmission of coronavirus (COVID-19), some restrictions to primary education settings are required in certain areas including Wandsworth. This policy is written in line with the contingency Framework – implementation guidance.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/949187/Contingency_framework_implementation_guidance.pdf

See Appendix 8 for further information

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 \(KCSIE\) 2020](#). The policy applies wherever staff are working with children, including when this involves being off-premises.

COVID-19

[Keeping Children Safe in Education \(KCSIE\) 2020 remains in force throughout the response to coronavirus \(COVID-19\) and is referred to consistently throughout all updated guidance.](#)

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>James Kelly, Assistant Head (Pastoral), Designated Safeguarding Lead 07782645694 James.kelly@falcons girls.co.uk</p> <p>Jessica Montgomery, Nursery Lead, Deputy Designated Safeguarding Lead 07590569704 Jessica.montgomery@falcons girls.co.uk <u>The Nursery Lead is responsible for EYFS and is a member of the Senior Leadership Team</u></p> <p>Sara Williams-Ryan, Headmistress, Deputy Designated Safeguarding Lead Telephone : 0208 992 5189 ext 7420 / mobile : 07557799600 Sara.williams-ryan@falcons girls.co.uk</p>
Review date:	June 2020
Adopted:	September 2020
Next Review:	Septemeber 2021

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



Safeguarding Policy

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, supply staff, volunteers, contractors and governors.



Safeguarding Policy

The DSL and / or her deputies can be contacted even when school events or trips are taking place outside regular school hours.

If the designated safeguarding lead or deputies are not available, staff should not delay in taking appropriate action. Staff should consider talking to a member of the senior leadership team and / or taking advice from the local children’s social care – the Multi-Agency Safeguarding Hub (MASH).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care at MASH (and if appropriate the police) is made immediately. Staff members should ensure they are prepared for the referral with clear details of their concern and the child’s name, DoB, address and contact details for parents/carers.

Referrals to the Wandsworth MASH can be made by telephone: 020 8871 6622 or e-mail: mash@wandsworth.gov.uk

MASH is in operation Monday – Friday 9.00am to 5.00pm. At other times (evening, weekends or bank holidays) please contact the Out of Hours Duty Service on 020 8871 6000.

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

Governor contact details:

- John Withers (Nominated lead) – 0207 487 6000; john.withers@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>Wandsworth MASH</p>	<p>020 8871 6622 outside office hours or at weekends: 020 8871 6000 mash@wandsworth.gov.uk</p>
<p>Wandsworth Safeguarding Children Partnership (Click on this link for the new safeguarding arrangements)</p>	<p>2nd Floor, Executive Suite, Town Hall, Wandsworth High Street, SW18 2PU Call: 020 8871 8610 / 7401 Email: wscb@wandsworth.gov.uk; Web: www.wscb.org.uk/</p>



Safeguarding Policy

Wandsworth LADO	Anita Gibbons 07974 586461 Anita.Gibbons@richmondandwandsworth.gov.uk
Wandsworth Social Care Safeguarding Manager	Ruth Lacey 020 8871 7858 rlacey@wandsworth.gov.uk
Wandsworth Education Safeguarding Advisor	Ameliah Rayn 07929 862210 Ameliah.Rayn@RichmondandWandsworth.gov.uk
Police	For emergencies call: 999 For non-emergencies call: 101
Safer Neighbourhood Team	Call 020 8785 8145
Professionals Online Safety Helpline (UK Safer Internet Centre)	Call 03443814772 Email helpline@saferinternet.org.uk
Preventing extremism in schools and children's services helpline	020 7340 7264 counter.extremism@education.gsi.gov.uk
Prevent Education Officer	Amelia Ryan 07825720941 Amelia.Ryan@RichmondandWandsworth.gov.uk
Home Office Strategic Prevent Lead at Wandsworth Borough Council	Alva Bailey 020 8871 6094 / 07774 331 640 Report suspected extremism online www.gov.uk/report-suspicious-activity-to-mi5 Report terrorist activity online www.gov.uk/report-terrorism
Report Female Genital Mutilation (FGM) to	Anita Gibbons 07974 586461 Anita.Gibbons@richmondandwandsworth.gov.uk NSPCC FGM free phone helpline 0800 028 3550 or Crimestoppers free phone 0800 555 111
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk
Disclosure and Barring Service (DBS)	03000 200190 Barring referrals: dbsdipatch@dbs.gsi.gov.uk PO Box 181, Darlington DL1 9FA 01325 953 795
Homelessness concerns	Wandsworth Local Housing Authority www.wandsworth.gov.uk/info/200369/i_am_homeless/2223/homelessness/9
National Domestic Abuse Helpline (24 hours)	Call 0808 2000 247



Safeguarding Policy

Contents

- School ethos

PART A – PRINCIPLES AND RISKS

- Principles of safeguarding and welfare
- The scope of welfare (including references to our other policies which promote welfare)
- Identifying risks to the welfare of children
- Harm and abuse: definitions and categories
- Duty of staff
- Duty of parents

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

- Concerns
- Disclosures
- Taking action (including internal support, early help and referrals to children’s social care)
- Information sharing
- Record keeping
- Following through on a concern
- Female Genital Mutilation mandatory reporting duty for teachers
- Concerns about another member of staff including supply staff and volunteers
- Peer on peer abuse
- Conflicts of interest

PART C – THE MANAGEMENT OF SAFEGUARDING

- Working together to safeguard children
- The role and responsibilities of the Designated Safeguarding Lead (DSL)
- Managing referrals
- Raising awareness
- Training for the DSL
- Training for staff
- Teaching pupils about safeguarding
- Safer recruitment
- Alpha Plus Group governance

APPENDICES (see detail on next page)

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

DSL – Designated safeguarding lead

CSC – Children’s social care

WSCP – Wandsworth safeguarding children partnership

FGM – Female genital mutilation

CSE – Child sexual exploitation

KCSIE – Keeping Children Safe in Education

WT – Working Together (to Safeguard Children)

FBV – fundamental British values

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

Note - the head of Peregrines Nursery School and

Falcons School for Girls is referred to as **Headmistress**



Safeguarding Policy

Appendices

1. Categories of abuse and harm
2. Risk indicators of child abuse
3. Ideological harm: radicalisation and the 'Prevent Duty'
4. Risk indicators of being drawn into terrorism
5. Hyperlinks to further information on specific safeguarding topics
6. Concerns about and allegations against staff including supply staff and volunteers
7. EYFS specific policies – use of mobile phones and cameras



Safeguarding Policy

Peregrines Nursery and Falcons School for Girls Ethos

At Peregrines Nursery and Falcons School for Girls we believe passionately in:

- The close links between emotional wellbeing and academic achievement
- Encouraging children to be ambitious with their learning
- Fostering children's natural curiosity, positivity and resilience
- Engaging children about their role as citizen in our fast-changing world
- The importance of leading by example

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. Abuse can also occur entirely online as in the case of, for example, cyber-bullying.

Abuse can also

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.

⁴ including: [Children Act 1989](#) and subsequent amendments; [Education Act 2002](#); [Keeping Children Safe in Education KCSIE \(2020\)](#); [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.



Safeguarding Policy

The scope of welfare

Safeguarding and promoting the welfare of children is defined by KCSIE 2020 as:

- protecting children from maltreatment;
- 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 outcome



Safeguarding Policy

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:

- Anti-bullying, which includes cyber-bullying
- Behaviour, discipline and exclusion
- Staff code of conduct
- Ethical and professional conduct (Alpha Plus Group policy)⁵
- ICT⁶
- Personal, Social, Health and Economic Education (PSHEE). This also incorporates the spiritual, moral, social and cultural (SMSC) development of children, and Relationship Education (primary pupils) Relationship and Sex Education (for all secondary pupils) and Health Education
- Special Educational Needs and Disability (SEND)
- Health and safety plan
- Educational visits and risk assessments
- Whistleblowing policy, which explains the process for disclosure of malpractice
- Recruitment policy
- Missing and uncollected child policy

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

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 This policy covers the use of mobile phones and cameras in the Early Years Foundation Stage, as required by [The EYFS Statutory Framework](#). These risks and our related controls and procedures are covered extensively by our E-safety and ICT usage policies.

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



Safeguarding Policy

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school or college and/or can occur between children outside of these environments (for example, the child's peer group). Staff should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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' abuse)
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.

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



Safeguarding Policy

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.



Safeguarding Policy

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 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 Peregrines Nursery and Falcons School for Girls, 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.



Safeguarding Policy

- Recognise their responsibility to raise concerns⁹ about poor or unsafe practice and potential failures in the Peregrines Nursery and Falcons School for Girls 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 Peregrines Nursery and Falcons School for Girls of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the Peregrines Nursery and Falcons School for Girls 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.



Safeguarding Policy

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 Peregrines Nursery and Falcons School for Girls 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

¹¹ The [KCSIE \(2020\) 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.



Safeguarding Policy

reassured that the matter will be dealt with by experienced, caring people who operate with the 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 a Deputy DSL 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 a 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 a Deputy DSL will determine a course of action in line with WSCP 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 Deputies) 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 1 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 Deputies) should be informed as soon as practically possible.

1. Internal support

Pupils have access to a range of support within the school. They are encouraged to talk to a trusted adult, for example a Learning Assistant, their class teacher, another teacher or the Assistant Head (Pastoral). The SENCO and First Aid Officer are also available for chats. Additionally, pupil pastoral concerns are discussed at the biweekly staff briefings and at the weekly meetings between the Assistant Head (Pastoral), the Deputy Designated Safeguarding Lead and the Headmistress.

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. Guidance can be found here [When to call the police guidance for schools and colleges.pdf](#)

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



Safeguarding Policy

- 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

Referrals should be made to the Wandsworth MASH via the contact details on page 2. The MASH team will use the Signs of Safety framework and London Continuum of Needs thresholds to 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

For further information see:

<http://wandsworth.childreancesservicesdirectory.org.uk/kb5/wandsworth/fsd/advice.page?id=ZH-8d8rfKC0>

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. Peregrines Nursery and Falcons School for Girls 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 by contacting the Wandsworth Multi-Agency Safeguarding Hub (MASH). This can be made by telephone: 020 8871 6622 or

e-mail: mash@wandsworth.gov.uk

MASH is in operation Monday – Friday 9.00am to 5.00pm. At other times please contact the Out of Hours Duty Service on 020 8871 6000.

Parental consent is not needed to make a referral. However, the Peregrines Nursery and Falcons School for Girls will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). 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



Safeguarding Policy

allegation. These discussions are exploratory, and the DSL should be careful not to prejudice the outcome of any potential multi-agency investigation.

Information sharing¹⁴

Information sharing is vital in identifying and tackling all forms of abuse. Whilst The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised.

Special category data¹⁵ can be shared lawfully if it is to keep a child safe. Be open and honest with the individual (and/or the family where appropriate) 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 the information you share 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 Deputies DSL.

Project Tearose is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools. Peregrines Nursery and Falcons School for Girls have signed up to this agreement. If police have responded to a domestic incident and there are children in the family, the officers working on Project Tearose will disclose this incident to the child's school the following morning (Monday to Friday). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details. At each school the information is shared securely with the designated safeguarding leads, and is treated as sensitive and confidential. Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child, and so that support can be offered to the child if necessary. The school is part of the network available to support the family and child.

Record keeping

All concerns, discussions and decisions made, the reasons for those decisions, and any actions taken, should be recorded in writing. The Headmistress keeps the Safeguarding files and all related documents in a locked cabinet in her office. Since October 2018, all staff at Peregrines Nursery and Falcons School for Girls are able to enter any concerns on 'My Concern', an online system for recording and viewing safeguarding and child protection incidents centrally. Any action taken and decision making is outlined using this system. Only the Headmistress, the DSL and her deputies are able to view and add updates to concerns stored on 'My Concern'.

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 a Deputy DSL should expect an acknowledgement and a brief

¹⁴ For further information, see [Information sharing: advice for practitioners providing safeguarding services](#) (July 2018), which contains a myth-busting guide to information sharing.

¹⁵ Defined as personal and sensitive data



Safeguarding Policy

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 by contacting the MASH team (see page 2 of this document for contact details), 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 \(2020\)](#).

Concerns and allegations about another member of staff including supply staff and volunteers

If a disclosure, or any other evidence, reveals possible safeguarding concerns about any staff members, including supply staff and volunteers, then this should be referred to the Headmistress.

Where there are concerns/allegations about the Headmistress, 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.

Peer on peer abuse¹⁶

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, including physical, sexual, emotional and/or financial abuse. Peer on peer abuse involves coercive control, exercised between children, and within children’s relationships, friendships and wider peer associations. It can take various forms including, but not limited to: serious bullying (including cyberbullying), physical abuse, sexual violence and harassment, sexting, upskirting¹⁷, initiation/hazing type rituals, and violence. The abuse may take place in person and/or through technology.

¹⁶ In-depth guidance can be found in [Part 5 of KCSIE](#)

¹⁷ Upskirting is a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission 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. . It is not only confined to victims wearing skirts or dresses. Anyone of any gender, can be a victim. It is now a criminal offence under the Voyeurism (Offences) Act 2019.



Safeguarding Policy

Staff must be clear that abuse is abuse and should never be tolerated or dismissed as ‘banter’, ‘just having a laugh’ or ‘part of growing up’.

Support and sanctions will be considered on a case-by-case basis. In some cases, instances will be recorded, investigated and dealt with under the Peregrines Nursery and Falcons School for Girls’ 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 always consult with the DSL or a Deputy DSL, who will use their professional judgement to assess the nature and seriousness of the alleged behaviour.

Where cases involve a safeguarding concern the DSL will determine the best course of action, taking into account the child’s wishes. Actions may include:

- Consulting with the children involved to understand their needs
- Managing the incident internally with help from external specialists where appropriate and possible
- Contributing to inter-agency early help assessments
- Making a referral to social care, where a child is at risk of or suffering harm
- Reporting alleged criminal behaviour to the police
- Carrying out a risk assessment and creating a safety plan to protect and support the children directly involved, and others who may have been impacted
- Liaising with the senior leadership team to determine whether disciplinary action is required
- Bolstering protective factors and influences within the school to protect against future instances of peer on peer abuse

In cases of sexual violence and harassment¹⁸:

- Incidents must be reported to the DSL/Deputies as soon as possible and responded to in line with national guidance¹⁹. If the incident involves youth produced sexual imagery (where a child creates and/or shares sexual imagery of themselves or another child; also known as ‘sexting’) staff should avoid viewing any pornographic images of children but should ensure such images are not deleted from devices, as they may form part of a police investigation. National guidance on sexting²⁰ will be followed as part of the school’s response.
- **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 children involved in the Peregrines Nursery and Falcons School for Girls. The pupils should also be invited to choose a designated trusted adult they can talk to about their needs

¹⁸ Sexual violence refers to sexual offences under the [Sexual Offences Act 2003](#) including rape, assault by penetration and sexual assault. Sexual harassment involves unwanted conduct of a sexual nature e.g. comments, taunting, physical behaviour, displaying sexual imagery and online sexual harassment.

¹⁹ See [Sexual violence and harassment between children in schools and colleges](#)

²⁰ See [Searching, screening and confiscation advice for schools](#) and UKCCIS [Guidance on sexting](#)



Safeguarding Policy

- 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:

- Taking all cases seriously and making it known that any form of peer on peer abuse is unacceptable
- Challenging any form of derogatory or sexualised language or behaviour
- 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 through the personalised letter sent by their class teacher at the start of the academic year, messaging which is regularly repeated in assemblies and through the PSHEE programme.
- Pupils know they can talk to staff through the initiation and maintenance of our key person system under which children build close relationships with their lead adult
- Ensuring pupils know they can talk to staff at any time is done through class circle time and in school assemblies run by the DSL.
- Through pastoral and Head's assemblies, the PSHEE programme, promoting the school code of conduct, external speakers, etc.
- Whole school relationships and sex education programme
- Students are made aware of who they can go to and how to make contact with them through posters, awareness in assemblies, PSHEE and in tutor time
- Ensuring pupils know they can talk to staff is explained during induction and through the pastoral system
- By publicising contact details (e.g. Childline) through the online student portal and through noticeboards
- By establishing good relationships between students, teachers and other staff and by delivering good quality PSHE both in the classroom and through external experts

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



Safeguarding Policy

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 Peregrines Nursery and Falcons School for Girls 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.

Children who need a social worker (Child in Need and Child Protection Plans) are potentially at greater risk of harm. LAs should share this information with the schools and colleges and the DSL should use this information so that decisions can be made in the best interest of the child. It should inform decision making about safeguarding (for example responding to unauthorised absence) and about promoting welfare (for example provision for pastoral and/or academic support) for this child.

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

For further information see: http://www.wscb.org.uk/wscb/info/3/professionals_and_volunteers

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 Headmistress, 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 Deputies' 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



online²⁶

Safeguarding Policy

- 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

²⁶ The school uses filtering and monitoring software 'Smoothwall' to prevent access to content deemed to be potentially harmful. The filters can be adjusted to suit pupils' age and development. The software also captures if a student searches online for potentially harmful content or looks for concerning information. The DSL can run reports to identify risk alerts and log concerns. For pupils already at risk, the DSL can use Smoothwall to check for escalation and this can be shared with the relevant bodies.



Safeguarding Policy

- keeping the Headmistress informed of all significant safeguarding matters
- 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 Partnership (WSCP).
- Refer all cases of suspected abuse to the local authority children's social care and:
 - The designated officer(s) for child protection concerns (all cases which concern a staff member, including supply staff and volunteers),
 - 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 Headmistress 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 Peregrines Nursery and Falcons School for Girls in this.
- Liaise with the WSCP to ensure awareness of local multi-agency procedures, local referral procedures and training opportunities, and maintain a list of local multi-agency contacts.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Ensuring that the school or college staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children
- Where children leave the school ensure their child protection file is transferred to the new school 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 Deputies 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.



Safeguarding Policy

Formal training should be at an advanced level as appropriate to the role and updated every two years. The DSL and Deputies 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 Heads/Principals)

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 Deputies, the behaviour policy, online safety, 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 WSCP. Formal training is completed between every 24 and 36 months from their last training, unless particular circumstances require greater frequency. Additionally, safeguarding case studies are regularly discussed at the weekly staff meeting in order to share good practice.

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 Deputies 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 WSCP operates, the conduct of a child protection case conference and how to contribute to these effectively when required
- e-safety training
- 'Prevent' training
- Identifying and managing incidents of peer on peer abuse including violence and sexual harassment

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.

Teaching pupils about safeguarding

Pupils are taught about safeguarding, including online safety, through the weekly assemblies and the PSHEE programme.



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 (2020)²¹.

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

The school ensures that it does not knowingly employ individuals disqualified under the Childcare Act 2006 and Childcare Regulations 2018. This applies to staff engaged in childcare of under 8s, and those who manage the childcare provision of under 8s. The school fulfils this obligation through enhanced DBS checks on new employees, as relevant. Employees must inform the Headmistress if they meet the disqualification criteria at any time whilst employed at the school.

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, suspended or re-deployed due to safeguarding concerns, or would have been had they not resigned. Referrals will be made as soon as possible, and ordinarily on conclusion of an investigation.

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 annual 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.

²¹ 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 DSL²². 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 marriage²³, 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.

²² 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.**

²³ For further guidance see <https://www.gov.uk/guidance/forced-marriage>



Safeguarding Policy

- conveying that a child is worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person.
- 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 views²⁴.

Domestic Abuse

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. The definition of domestic violence and abuse is any incident or pattern of incidents involving controlling, coercive, threatening behaviour, violence or abuse between those ages 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and physiological impact on children.

National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day on 0800 2000 24/7.

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'²⁵, 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 (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE occur where an individual, males or females, children or adults or group takes advantage of an **imbalance of power**²⁶ to coerce, manipulate or deceive a child into sexual activity:

- a) in exchange for something the victim needs or wants (for example food, accommodation,



Safeguarding Policy

- 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
 - c) through violence or the threat of violence

The abuse can be one-off or a series of incidents over time, and range from opportunistic to complex organised abuse. 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.

²⁴ 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.

²⁵ 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.

²⁶ For example, age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources



Safeguarding Policy

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.

Mental Health

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.

Staff should not attempt to make a diagnosis as this can only be by a trained professional. Staff who have observed the child and have concerns that their behaviour may suggest they may be experiencing mental health problems should follow the child protection policy and speak to the DSL or a deputy DSL.²⁷

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.

Peregrines Nursery School and Falcons School for Girls 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 \(Pupil Registration\) \(England\) 828Regulations 2006 \(as amended\)](#).²⁸

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

²⁷ More guidance can be found at <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> and for secondary schools <https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

²⁸ For further guidance see <https://www.gov.uk/government/publications/children-missing-education>



Safeguarding Policy

might be at risk of abuse or neglect.

All schools 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, the school should hold more than one emergency contact number for each pupil or student.

Specific safeguarding issues

County lines

Gangs are deliberately targeting young people for criminal exploitation. These gangs groom, threaten or manipulate children into trafficking drugs. Staff should be aware that this activity is happening across the country and could affect the students in their school. It is important to remember that young people may initially be approached by their peers, who have also been groomed and exploited, and so may not recognise the risks. Staff should be alert to changes in friendship groups, changes in wellbeing and performance, unexplained absences, secretive behaviour and unexplained gifts and injuries. These indicators may also signal that a child is at risk from, or involved with serious violent crime.

Staff should be aware of the full range of specific safeguarding issues. Additional information can be found in Appendix 5 of this document and Annex A of [KCSIE 2020](#).



Safeguarding Policy



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 performance²⁸ 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 a Deputy DSL if in doubt about any symptoms that might be indicative of abuse²⁹.

²⁸ 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.

²⁹ 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.

Terrorism is defined as 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 of 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.

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 democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. 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:



Safeguarding Policy

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



Safeguarding Policy

- 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 WSCP
- ensure that staff have training that gives them the knowledge and confidence to identify³⁰ 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>

The Home Office has developed three e-learning modules:

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html> offers an introduction to the Prevent duty.

https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html supports staff to make Prevent referrals that are robust, informed and with good intention.

https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html this is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.



Safeguarding Policy

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

³⁰ Where appropriate, staff should familiarise themselves with general risk indicators for vulnerability to being drawn into terrorism listed in Appendix 4



Safeguarding Policy

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?



Safeguarding Policy

- 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 can be found on the TES website and the NSPCC website.

Staff 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/>
- data protection: tool kit for schools
<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>
- 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



Safeguarding Policy

<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>

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview> (secondary schools)

- private fostering

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

- online safety

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

- police (when to call the police flow charts)

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

- preventing radicalisation_

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

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

- sexting_

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_K_G_NCA_Sexting_in_Schools_WEB_1_.PDF

- sexual violence and harassment

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

- teenage relationship abuse_



Safeguarding Policy

<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>

- Ofsted Terms of Reference for sexual abuse in schools

<https://www.gov.uk/government/publications/ofsted-review-of-sexual-abuse/ofsted-review-into-sexual-abuse-in-schools-terms-of-reference>

- Farrer's peer-on-peer abuse toolkit

<https://www.farrer.co.uk/news-and-insights/peer-on-peer-abuse-toolkit/>

- NSPCC Helpline for sexual abuse in schools.

<https://dfemedia.blog.gov.uk/2021/04/01/everything-you-need-to-know-about-the-governments-newly-launched-abuse-in-education-helpline/>

- Contextual Safeguarding Network regarding their project on harmful sexual behaviours helpful [Beyond Referrals - Schools \(csnetwork.org.uk\)](https://www.csnetwork.org.uk/)

- <https://stopabusetogether.campaign.gov.uk/>



Safeguarding Policy

Appendix 6

Concerns and allegations about staffs, including supply teachers and volunteers

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

Reasonable care must be taken to safeguard staff, supply teachers or volunteers against the effects of false and malicious allegations; however, considerations of child protection must always be paramount. The Headmistress 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
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with 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 Headmistress or Lead Governor (if the matter concerns the Headmistress) 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 Headmistress/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.

If an allegation is made against an individual that is not directly employed by the school or college, where its disciplinary procedures do not fully apply, for example, supply teachers, they should still ensure that allegations are dealt with properly. The school or college should not cease to use the supply teacher but should find out the facts and liaise with the local authority designated officer (LADO) to determine a suitable outcome. Agencies should be fully involved and co-operate in any enquires from the LADO, police and/or children's social services.

Reporting to Ofsted

In EYFS settings, a report must be made to Ofsted³¹ 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



Safeguarding Policy

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.

³¹ In accordance with section 3.8 of the [EYFS Statutory Framework](#) (2017)



Safeguarding Policy

The Headmistress 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. 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 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 (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 Headmistress 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 Headmistress 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.



Safeguarding Policy

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 where³²:

- 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 Agency³³.

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.

³² For further guidance and an explanation of the harm test see [Making barring referrals to the DBS](#)

³³ For further guidance see [Teacher misconduct: referring a case](#)



Safeguarding Policy

Appendix 7

EYFS-specific safeguarding provisions Mobile phones and cameras

Mobile phones

Staff may bring in personal mobile telephones and devices for their own use but must ensure that these are left inside their bag or locker throughout contact time with children. Under no circumstances may staff contact a current parent/carer or pupil using their personal device.

Staff bringing personal devices into the Early Years setting must ensure there is no inappropriate or illegal content on the device.

Mobile phone calls may only be taken at staff breaks or in staff members' own time and in an area where children are not present. If staff have a personal emergency they are free to use the setting's telephone or make a personal call from their mobile in an area where children are not present. If any staff member has a family emergency or similar and needs to keep their mobile phone to hand, prior permission must be sought from the Headmistress or Deputy Head. The staff member may then keep it in a locked drawer in a desk in the Early Years setting.

It is the responsibility of individual staff to ensure that the Head teacher has up to date contact information and that their families, children's schools etc. and know their emergency work telephone number.

During group outings nominated staff will have access to the setting's nominated mobile phone, which is to be used for emergency purposes or contacting the school only; this phone does not have the capability to take pictures or record video. It is the responsibility of all members of staff to be vigilant and report any concerns to the Headmistress.

Concerns will be taken seriously, logged and investigated appropriately (see allegations against a member of staff policy).

The Headmistress reserves the right to check the image contents of a member of staff's mobile phone should there be any cause for concern over the appropriate use of it. Should inappropriate material be found then the Local Authority Designated Officer (LADO) will be contacted immediately together with the Director of Schools and the Head of HR at Alpha Plus. The Alpha Plus Group will follow any appropriate disciplinary measures informed by the guidance of the LADO. These measures may result in staff member's dismissal.

Cameras

Photographs taken for the purpose of recording a child or groups of children participating in activities or celebrating their achievements is an effective form of recording their progression in the Early Years Foundation Stage. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care.

Under no circumstance may staff use their mobile phone or personal camera to take photographs within the setting. Should a member staff fail to comply with this, it will result in disciplinary action.



Safeguarding Policy

Only the designated Early Years setting cameras may be used to take any photograph within the setting or on outings. Images taken must be deemed suitable and must never put a child in any compromising positions that could cause embarrassment or distress or harm.

All staff are responsible for the location of the cameras. Cameras must be locked away at the end each day.

Images taken and stored on the camera must be downloaded as soon as possible, ideally once a week, and the images deleted from the camera's memory card.

Under no circumstances must cameras of any kind be taken into the bathrooms without prior consultation with the Head. If photographs need to be taken in a bathroom, i.e. photographs of the children washing their hands, permission must be obtained from the Head and staff be supervised whilst taking the specific photograph. At all times the camera must be placed in a prominent place where it can be seen.

Failure to adhere to the contents of this policy will lead to disciplinary procedures being followed.



Safeguarding Policy

Appendix 8

Changes in light of Contingency Guidance 04/01/2021

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/949187/Contingency_framework_implementation_guidance.pdf

With the school shifting to a remote learning set up for the majority of pupils, there are to be some minor changes to the safeguarding policy during the COVID-19 Tier 4 restrictions in London. The school will remain open for vulnerable children and children of critical workers so staff will be split with some on site and others working from home. The latest announcement plans for this to be in place for a minimum of 6 weeks (until February half term 2021). This policy will remain under review and updated accordingly.

With different members of staff working on site and at home, it temporarily changes or procedure for who to contact when having a concern about the welfare of a child.

We will ensure that the school will have a trained DSL (or deputy) available on site. At all times, the DSL will be available to be contacted via phone or online video, while working from home. Where a trained DSL (or deputy) is not on site, in addition to one of the above options, a senior leader (the Head or Deputy) should take responsibility for co-ordinating safeguarding on site.

While working on site, staff will contact the person available (DSL or deputy). While working remotely, staff are required to contact the DSL via video call or email.