



Bales College Safeguarding Policy

September 2023

This policy applies to all staff working at Bales College

Policy owner: Mrs Poonam Sachdeva (DSL)

Frequency of review: At least annually, or whenever government updates require it

Dates of previous review: 31st July 2023 by Mark Yearsley

Date of next formal review: August 2024

Linked policies/documents: See Section six for full list of linked policies

Key Personnel

Our 'designated persons' with 'status and authority' to take responsibility for child protection matters are:

- The Principal Mr William Moore; 020 8960 5899
- Mrs Poonam Sachdeva the Designated Person (DP)
- The above can be contacted by telephone during school hours on: 020 8960 5899, out of hours on 07590 267 909
- The email contact is: office@balescollege.co.uk
- Mr John Corcut is the Deputy Designated Person (DDP): Director of Studies & Head of Sixth Form
- Any non-CP pastoral concerns should be reported to the Director of Studies (Key Stage 4 & Key Stage 5): Mr John Corcut: jcorcut@balescollege.co.uk or for Key Stage 3, Mr Lee Dellor: ldellor@balescollege.co.uk
- Concerns could also be raised with Dr Ben Moore the Vice Principal
- Directors can be contacted via the school office 020 8960 5899 or

benmoore@balescollege.co.uk

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SECTION ONE - INTRODUCTION, SCOPE, PERSONNEL

Safeguarding and promoting the welfare of children are defined for statutory purposes as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The core safeguarding principles of Bales College referred hereafter to as the 'School', are:

- a. It is the responsibility of the School to safeguard and actively promote the welfare of children;
- b. Children who are and feel safe make more successful learners.

The Safeguarding and Child Protection Policy, together with the effectiveness of its implementation, is reviewed annually by the Principal and Directors, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy (which includes all sections and all of the appendices in this document) is one of a series in the School's integrated safeguarding portfolio. This policy has been authorised by the Principal and DSL (Mrs Poonam Sachdeva) and is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

This policy has been developed in accordance with the principles established by the Education and Skills Act 2008, the Children Acts 1989 and 2004, the Children and Social Work Act 2017 and the Childcare Act 2006; the Education (Independent School Standards) Regulations 2014, and in line with government publications: Working Together to Safeguard Children (July 2018), Keeping Children Safe in Education September 2023 (KCSIE) .This policy also takes into account further statutory guidance applicable to the School comprising:

- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- Revised Prevent duty guidance for England and Wales (HM Government, July 2021)
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, April 2015)
- Multi-agency statutory guidance on female genital mutilation (HM Government, April 2016)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), August 2016)
- Children missing education (DfE, September 2016)
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)

- Sexual violence and sexual harassment between children in schools and colleges, Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (September 2021)
- Teaching Online Safety in Schools (June 2019)
- Safeguarding children and protecting professionals in early years settings: online safety considerations (UKCCIS, February 2019)
- Relationships education, relationships and sex education and health education guidance (DfE, June 2019)
- The Human Rights Act (1998) and in particular Article 3, Article 8, Article 14 and Protocol 1 Article 2.
- Equality Act (2010)

In this policy, 'DSL' refers to the 'Designated Safeguarding Lead'. Any reference to the Local Authority Designated Officer (LADO) also includes the possibility of a team of officers being used by the Local Authority (LA).

In ensuring this policy is put into practice in the school, where the DSL is unavailable, the Deputy DSL will act to fulfil the responsibilities and roles outlined below.

Policy Statement, Principles and Aims

The protection and welfare of pupils at Bales College is of paramount importance. Children and parents have a right to expect the school to provide a safe and secure environment and the school has a general duty for children's welfare as part of its role "in loco parentis". The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and create a culture of safety, equality and protection. We endeavour to provide a safe and welcoming environment where children are listened to, respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. As a school, we take steps to ensure that we provide a safe and trusted environment and protect people who come into contact with us from harm.

Principles

The School's Commitment to Safeguarding

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All staff, including the Principal, are responsible for safeguarding the welfare of children as part of their professional duties;
- Indeed, everyone who comes into contact with children and their families and carers has a role to play in safeguarding children;
- No single professional can have a full picture of a child's needs and circumstances; everyone who comes into contact with the child and their family has a role to play, therefore;

- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm; the full version of KCSIE is available to all staff;
- The safety of a child is of the utmost importance, overriding any additional concerns, for example, relating to data protection or fears of sharing information (see later)
- The school plays a key role because staff are in a position to identify concerns early, provide help for children and prevent concerns from escalating.
- Safeguarding and promoting the welfare of children is defined for the purposes of this policy 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 outcomes.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Mental Health

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy.

The Best Interests of the Child

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible. Paramount in all dealings should be asking what is in the best interests of the child.

Safer Recruitment

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Safer Recruitment policy; where staff from another organisation are working with pupils on another site, the School will have received written confirmation that appropriate child protection checks and procedures have been carried out on those staff.

Appropriate Support and Training

All pupils and staff involved in child protection issues will receive appropriate support from the Senior Management of the School who will follow this policy guidance and statutory guidance in all that they do.

Multi-agency work

The Westminster LSCB, which from September 2019 is replaced by the Westminster Safeguarding Children Partnership (WSCP). The DSL works closely in partnership with the WSCP to ensure that the School follows relevant local arrangements at all times. The pupil intake at Bales College means that we also work in partnership with other safeguarding partnership across London.

The school will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering harm or who may suffer harm without appropriate intervention. The school will work with Westminster Children's Services, the police, health and other services to promote the welfare of children and to protect them from harm. This may include a contribution to Early Help and contributing to multiagency plans to provide additional support to those children subject to child protection plans or deemed 'Children in Need'. The school understands its duty to work with the local authority to support assessments made of children in need as set out in KCSIE.

The School recognises and understands the important role it plays in the wider safeguarding system, particularly in relation to Early Help and initial support given to the pupils to ensure that pupils receive the right help at the right time.

Early Help means providing support as soon as a problem emerges at any point in a child's life. It may require staff to support other agencies and professionals in an Early Help Assessment, sharing information in the best interests of the child. Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a Section 17 or a Section 47 assessment. In addition, the School will comply with any request to supply information to WSCP that it requires in order for it to perform its functions.

The School understands the importance of all involved in supporting children and families sharing information and taking prompt action.

'It Could Happen Here' This is a vital principle underpinning all training and approaches to safeguarding at Bales College.

Aims of this policy

The aims of this policy are as follows:

- to actively promote and safeguard the welfare of children, staff and others who come into contact with the school and to protect them from harm, thereby fostering a culture of safety, equality and protection;
- to have clear procedures in place for dealing with and referring concerns about a pupil's welfare and allegations of abuse;
- to raise the awareness of all those within the School communities who come into contact with children, including Directors, Head, staff and volunteers of their responsibilities to safeguard children and to report concerns;
- to ensure consistent good safeguarding practice throughout the School.

Framework for the policy

This policy has been written in accordance with government statutory guidance and locally agreed multi-agency procedures (Westminster) and is available on the School website.

There are five main elements:

- Establishing a safe environment in which children can learn and develop and which protects all those who come into contact with the School from harm.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Ensuring safe recruitment in checking the suitability of staff and volunteers to work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected or likely cases, of abuse, neglect or harm.
- In accordance with his/her agreed child protection plan, supporting pupils who have been abused.

Key Personnel

Mrs Poonam Sachdeva, as the Designated Safeguarding Lead, has lead responsibility for safeguarding and child protection (including online safety) and sits on the SLT. Whilst the activities of the designated safeguarding lead can be delegated to the appropriately trained deputy, the ultimate lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) remains with the designated safeguarding lead.

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The Designated Safeguarding Lead (DSL) and the Deputy DSL meet at least weekly but usually communicate daily - to discuss any individual cases and concerns. The DSL is the first point of contact for all staff; he keeps the central file and registers of categories of pupils. The DSL and Deputy DSL communicate with the LADO and Children's Services locally, with whom they are able to build up strong contacts; the DSL (Mrs Sachdeva) always meet to discuss any contact like this. Both may handle any communication with the Police.

Awareness:

Pupils are made aware of the Designated Safeguarding Leads' names through prominent signs in reception, as well as during relevant PSHEE sessions and assemblies.

SECTION TWO: ROLES AND RESPONSIBILITIES AT BALES COLLEGE

Roles and responsibilities in Managing Safeguarding & Child Protection

All Staff

All staff, which includes the Principal, Directors, teaching and support staff, supply staff including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff'), have a statutory responsibility to:

- Have read this Safeguarding policy, including the safeguarding response to children missing from education;
- Have read at least part one of Keeping Children Safe in Education (September 2023)
- Have read the School's Behaviour policy and the staff Code of Conduct;
- Understand the role of the DSL and be able to identify the DSL and Deputy DSL and work with them and, if required, to support social workers to take decisions about individual children;
- Provide a safe environment in which children can learn;
- Be aware of systems, policies and procedures within the School which support safeguarding;
- Be aware of the indicators of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, harm and in such circumstances to take appropriate action, working with other services as needed;
- Attend appropriate safeguarding and child protection training on appointment and subsequent refresher training at least annually with safeguarding partner guidance, including training regarding the Prevent duty;
- Make a direct referral to Westminster Children's Services immediately (via Front Door for Families) if, at any point, there is a risk of immediate serious harm or if the child is suffering harm;
- Expect to support social workers and other agencies following any referral;
- Be prepared to identify children who may benefit from Early Help (see this policy for relevant indicators). Early Help means providing support as soon as a problem emerges at any point in a child's life;
- Staff should keep in mind that cases should be kept under review and consideration given to a referral for assessment if the child's situation does not appear to be improving or is getting worse – staff should follow local escalation procedures to ensure concerns have been addressed and most importantly that the child's situation improves.

Staff should not assume that a colleague or another professional will take action, and should be mindful that early information sharing is vital for effective support being put in place.

Designated Safeguarding Lead and Deputy DSL

The DSL and Deputy DSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

The broad areas of responsibility for the DSL are as follows and taken from KCSIE; should the DSL be unavailable, the Deputy DSL will fulfil these roles in the first instance.

The DSL or Deputy should always be available to discuss safeguarding concerns. If the DSL or Deputy is not available, this should not delay appropriate action being taken. If for any reason they are not contactable, staff may speak to a member of the Senior Management Team (SMT) and/or take advice from local children's services; in these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

The designated safeguarding lead and any deputies should liaise with safeguarding partners and work with other agencies in line with, Working Together to Safeguard Children

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

and When to call the police

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

Managing referrals

The DSL and Deputy DSL will:

Refer all cases of suspected abuse to:

- the local authority's Children's Social Care;
- The Local Authority Designated Officer (LADO) for concerns relating to a staff member;
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and/or Police (cases where a crime may have been committed).
- The Channel programme, in cases of possible radicalisation.

Liaise with the Principal, as appropriate, to inform him of safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.

With the Deputy DSL, 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.

Keep written records of concerns, discussions, decisions and reasons for decisions taken.

Contact pupils' previous schools to request safeguarding information.

Training requirements: DSL and Deputy DSL

The DSL and Deputy DSL will receive updated training carried out at least every two years, but maintain up-to-date understanding at least annually, 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 locally agreed procedures for child protection and multi-agency working, in particular 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. This will include training in the WSCP's approach to Prevent duties and ensuring a good understanding of harmful sexual behaviour to aid in planning education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole School approach to safeguarding.
- Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures and the staff Code of Conduct, especially new and part time staff.
- Be alert to and support the specific needs of children in need, those with special educational needs and young carers.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School.

- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- 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 the School may put in place to protect them.

The DSL and Deputy DSL receive updates on safeguarding from the Local Authority and from external providers.

Training of Staff

The DSL and Deputy DSL will ensure that:

- all staff have received the required annual safeguarding training (the content of which will be in line with local procedures and expectations) and have signed to indicate that they have read and understood this safeguarding policy (including safeguarding response to children missing education), the Behaviour policy, the Code of Conduct (which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils) and Part One of KCSIE and that they know who the DSL is;
- all staff receive training to enable them to fulfil their responsibilities listed above, including having an understanding of Early Help, the importance of sharing information, how to manage a report of child on child sexual violence and sexual harassment (in accordance with Part 5 of KCSIE), making a referral themselves and finding guidance on how to do this, as well as the role they might be expected to play in any assessment;
- all staff know what to do if a child tells them he/she is being abused/neglected, including maintaining an appropriate level of confidentiality and only involving those who need to be involved;
- all staff understand the difference between a 'child in need' and a 'child at risk';
- all staff receive Prevent awareness training as part of the Safeguarding training; the DSL and Deputies complete an advanced training course relating to the Channel programme and the Prevent Duty.
- all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- all staff complete a safeguarding questionnaire at least annually to demonstrate understanding of the core components of KCSIE and the School's safeguarding policy.
- Staff are given the chance to provide feedback or ideas relating to the safeguarding at Bales College.
- All staff receive safeguarding and child protection updates (for example via email and staff meetings) as required, and at least annually.

Training of Principal and Directors

The school will ensure that the Principal and Directors will receive appropriate safeguarding and child protection training at appropriate points. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a whole school approach to safeguarding.

Raising Awareness

The DSL will ensure the School's policies are known and used appropriately. Together with the Deputy DL, the DSL will:

- Ensure the School's Safeguarding and Child Protection Policy and the staff Code of Conduct are reviewed annually and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures (in particular the transition from LSCB to the WSCP) and national statutory requirements and guidance, and work with the Principal and Directors regarding this.
- Provide Safeguarding updates and reminders at briefings/staff meetings.
- Carry out an annual 'audit' of school procedures
- Ensure the Safeguarding Policy is available publicly (through the School website) and parents are aware of the fact that referrals about suspected abuse or neglect must be made and the role of the school in this.
- Link with Westminster Children's Services, to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the school, ensure their child protection file is transferred to the new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt and where appropriate, that the child's social worker is informed.
- Consider whether it would be appropriate to share any information with the new school in advance of a child beginning at their new school, for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when they arrive.

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Notify the local authorities if a child with a Child Protection Plan is absent for more than two days without explanation.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social, Health and Economic Education (PSHEE) and/or Sex and Relationships Education (SRE).
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the School, in particular any pupils who go missing on repeat occasions.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with other agencies that support the pupil such as Social Services, Child and Adolescent Mental Health Service, the local authority Prevent co-ordinators, Education Welfare Service and Educational Psychology Service.
- Be responsible for the Prevent policy, updating the Prevent Risk Assessment and for approving and maintaining a log of all visiting speakers who attend the College.

Liaison between the DSL and the Nominated Director (Dr Ben Moore)

- When an issue arises which has potential child protection implications, the Designated Safeguarding Lead will inform the nominated director.

- At this stage, it may not be possible to make a clear judgement as to the seriousness of the issue, but it can be stated whether external agencies (Social Services/Medical professionals/Police) have been contacted.
- The Designated Safeguarding Lead will outline the next steps and the nominated director will continue to be made aware of actions and guidance in order to provide oversight of the College's response.
- In the event that allegations are made against the Principal; the Designated Safeguarding Lead must inform the nominated director first of all, without informing the Principal.
- If the allegations are against the Designated Safeguarding Lead, the Principal will be informed directly.
- The Designated Safeguarding Lead would always keep information to the nominated director to a 'no names' basis.

Record Keeping

The DSL and Deputy DSL record all information relating to child protection. This includes ensuring staff feel confident to raise a concern and that appropriate staff are able to update a concern, noting concerns, decisions made and the reasons for those decisions.

Deputy DSL. The Deputy DSL has also undertaken full child protection training and training in multi-agency working and will attend refresher training every two years. In the absence of the DSL the functions of the DSL will be carried out by the Deputy DSL. Throughout this policy, reference to the DSL includes the possibility that the Deputy DSL may stand in for the DSL if he is unavailable.

Principal and Directors

It is the Principal and Directors' overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. They take seriously their responsibility to uphold the aims of the school and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. Protecting those who come into contact with the School is a key priority. They are clear that the school should be a safe and trusted environment and must take reasonable steps to protect the people who come into contact with the School from harm. The reporting of Safeguarding practice at the School enables the Principal and Directors to ensure compliance with current legislation and to identify areas for improvement. They recognise that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

The Principal and Directors will ensure that:

- There is an effective and statutorily compliant safeguarding and child protection policy and procedures in place, together with a staff Code of Conduct and that these are provided with other required documentation to all staff (including temporary staff and volunteers) on induction;
- Committed staff are appointed to the Safeguarding team and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities as outlined above;
- The School contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018 through effective implementation of the child protection policy and procedures and good cooperation with local agencies;
- The School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the multi-agency safeguarding procedures, including understanding and reflecting local protocols for assessment and the WSCP threshold document.

- The School's safeguarding provision is audited in conjunction with the local authority on an annual basis;

- In line with KCSIE and Working Together to Safeguard Children, a Director (Dr Ben Moore) is nominated to:

- have oversight of safeguarding matters;
- be available to liaise with the local authority and/or partner agencies on issues of child protection;
- instigate the annual review of this policy.
- The School has statutorily compliant procedures for dealing with concerns/allegations made against members of staff including allegations made against the Principal (see part four of KCSIE and Appendix 3 of this document);
- The School also has procedures in place to handle allegations against other children of child on child abuse;
- The School operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance (see part three of KCSIE and the School's Recruitment policy and procedure).
- The School operates an effective training strategy that ensures all staff, including the Principal receive child protection training, in accordance with WSCP local safeguarding partner guidance.
- All staff undergo safeguarding and child protection training (including online safety) at induction and that all staff receive updates at least annually.
- Staff have the opportunity to contribute to safeguarding arrangements in School.
- The DSL and Deputy DSL receive refresher training at two-yearly intervals as a minimum, with annual updates.
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governance meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding.
- Where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after' or previously looked after.
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the school, in particular any pupils who go missing on repeat occasions.
- Appropriate online filters and monitoring systems are in place.
- Pupils are taught about safeguarding, including online safety.
- The child's wishes and feelings are taken into account when determining what action to take and what services and support to provide.
- The School has procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.

The Principal

The Principal will:

- Ensure that the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL, Deputy DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace, whether

or not it involves the safeguarding and welfare of children, is dealt with in accordance with the School's Whistle Blowing procedures;

- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith.
- Ensure that children's safety and welfare are addressed through the curriculum.
- Be able to understand safer recruitment procedures and processes and deal with allegations made against members of staff and volunteers.

Safeguarding Guidelines for all

To meet and maintain our responsibilities towards children, all members of the School community (staff, directors, pupils and parents) are expected to adhere to the following standards of good practice:

- In addition to the stated requirements in this policy, when circumstances require, to read and understand the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Code of Conduct, Anti-Bullying, Drugs and Substances Policy, Online Safety Policy, First Aid, Missing Pupil policy, Data Protection policies, SEN Policy, Whistleblowing Policy

Treating all children with respect; We expect all staff to treat children with respect by;

Setting a good example by conducting ourselves appropriately; - Involving children in decision-making which affects them; - Encouraging positive and safe behaviour among children; - Being a good listener; - Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here' where safeguarding is concerned; - Recognising that challenging behaviour may be an indicator of abuse; - Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid; - Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language; - Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse. - Be alert to the context in which safeguarding incidents and/or behaviours can occur, including association with factors outside the College. Staff should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. - Promoting the School ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued. - Making clear to all pupils that if they have any problems or worries these can be taken to a form tutor, a subject teacher or any member of the management team.

SECTION THREE AREAS OF SCHOOL LIFE UNDERPINNED BY SAFEGUARDING

Safer Recruitment

The School is committed to safer recruitment and the School's HR is responsible for implementing these practices. It is clearly understood that the use of recruitment procedures that help deter, reject or identify people who might abuse children is essential. The level of check (prohibition, direction, sanction, restriction) and/or DBS certificate depends on the role that is being offered and the duties involved.

The School carries out the required checks on staff as outlined in Part 3 of KCSIE.

More detailed information about our Recruitment policy and practice can be obtained from the school office. The School must be assured that any staff employed by another organisation and working with Bales College outside of School premises (for example, in another institution) have undergone relevant safeguarding checks. The School would obtain written confirmation from any agency or third party organisation (or alternative provider) that they have carried out the checks on an individual.

This includes a check in addition to DBS checks to ensure that the person is not prohibited from teaching. For those assuming management roles (including internal appointments/promotions), there is a further check under section 128 of the Education and Skills Act 2008, to ensure that managers are not prohibited from teaching, using the Teacher Services system. This includes not only senior managers, but those managing departments sometimes referred to as 'middle managers'. Full details are provided in the College's Recruitment Policy.

From August 2015, those appointed as Directors have also had section 128 checks completed. In response to KCSIE 2023's requirement for all such people to be checked.

Staff who have lived outside the UK undergo the same checks as other staff. In addition, we make any further checks appropriate so that any relevant events that occurred outside the UK can be considered. The Teaching Regulation Agency (TRA) system may enable the School to check on sanctions or restrictions from EEA authorities.

Monitoring/Supervising Staff and Volunteers

The School is committed to safer recruitment and ensuring that all necessary and appropriate checks are carried out for staff and volunteers. As part of the recruitment process, all new staff follow an induction process which includes a 'Day One Induction' meeting which focuses on safeguarding procedures and information, including online safety.

Clear expectations are set out for all staff and volunteers in the Code of Conduct which emphasises safeguarding and appropriate behaviour for staff and appropriate supervision for pupils and this is re-issued at the start of each academic year to all staff. The Whistleblowing policy is also highlighted to all staff who may have a concern about the behaviour of a colleague or, more generally, the school's safeguarding practices.

The School's expectations of appropriate supervision for pupils and monitoring of visitors are set out in the Visitors policy and Supervision policy. A log of all visiting speakers is kept by the DSL to monitor those who present to the pupil body, in accordance with our Prevent Policy.

Abuse of Trust and Inappropriate Relationships

All School staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The School's Code of Conduct separately set out expectations of staff.

All staff are aware of the potential for a pupil's relationship with another pupil to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in this policy.

Children who may be particularly vulnerable

Some children may be at increased risk of harm (both online and offline) as a result of neglect and/or physical, sexual or emotional abuse. See Appendix 1 and Appendix 2 of this policy for details about the types and indicators of abuse and neglect.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

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

Disabled or who have Special Educational Needs: - who may be particularly vulnerable or for whom additional barriers may exist in recognising or communicating about abuse and neglect. - assumptions may be made that behaviour, mood or injury may relate to the disability, without exploring the possibility of abuse. - children with SEND or disabilities may be disproportionately impacted by things like bullying without outwardly showing any signs, or more prone to peer group isolation than other children, making them even more vulnerable.

'Looked After' Children (LACs) or children in care, including Previously LACs: - The most common reason for children becoming looked after is as a result of abuse and/or neglect. - This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care. - There is a specific designated member of staff allocated and appropriately trained in each who keeps a register of all looked after pupils, and who is responsible for promoting the educational achievement of pupils who are looked after. A previously looked after child remains vulnerable and staff must have the knowledge and skills to keep previously looked after children safe. - The DSL should have information regarding the child's social worker.

Also, children who: - have previously returned home to their family from care; - young carers; - living in an identified domestic abuse situation; - affected by known family challenges, such as substance misuse, adult mental health problems or domestic abuse; - misusing alcohol or substances themselves; - frequently missing or who go missing from care or from home; - showing signs of being drawn into criminal or anti-social behaviour, including gangs or organised crime groups; - involved directly or indirectly in prostitution, modern slavery, child trafficking or exploitation; - at risk of being radicalised or exploited; - being privately fostered; - are showing early signs of abuse/neglect; - asylum seekers; - living away from home; - vulnerable to being bullied, or engaging in bullying; - living in temporary accommodation; - living transient lifestyles; - living in chaotic, neglectful and unsupportive home situations; - vulnerable to discrimination and maltreatment on the grounds of

race, ethnicity, religion or sexuality; - do not have English as a first language. - Children with a social worker.

Special consideration may include, as necessary, the appointment of an appropriately trained and informed teacher to promote the educational achievement of any child who is considered in need of such support.

Complaints about staff

The School's complaints procedure will be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. The complaints policy and procedure is available to all parents and staff.

Complaints from staff involving wrongdoing in the workplace are dealt with under the School's Whistle Blowing policy and Disciplinary and Grievance policy, both of which are available. Note that where a staff member feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, additional whistleblowing channels are open to them, including:

- The NSPCC whistleblowing helpline: 0800 028 0285 (8am to 8pm) or email help@nspcc.org.uk

Allegation against a member of staff

The procedure in Appendices 3 and 4 entitled Arrangements for Dealing with Allegations against Staff, and Low Level Concerns will apply if there is an allegation that a teacher or other member of staff or volunteer or contractor has:

Behaved in a way that has harmed a child, or may have harmed a child; - Possibly committed a criminal offence against or related to a child; - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children. Appendix 4, Low Level Concerns is for any uncertainty or "nagging doubt" about staff behaviour towards children.

If the allegation is made against a supply teacher, contractor or other person not directly employed by the School, the organisation or agency of employment will be informed in addition to following the procedures in this policy.

Allegations against former members of staff or volunteers who are no longer teaching should be referred to the police; concerns or suspicions about applicants for positions at the school should be referred to the DSL who will refer them to the LADO, or in an emergency or in cases of serious harm, directly to the police. Historical (non-recent) allegations of abuse should be referred to the police.

Concerns including allegations that may meet the harms test should be addressed as set out in Part four of KCSIE 2023.

Where there are allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. The guidance should be followed where it is alleged that anyone working in the school including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These instances may have taken place outside school but we would always follow the guidance because of the potential of 'transferable risk'.

The Principal should be always informed of allegations made against former members of staff/volunteers who are no longer working at the school.

Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All new staff will receive training on appointment as part of their induction, overseen by the DSL. The training, which is updated regularly based on WSCP advice, includes: - this policy, including the safeguarding response to children missing education; - the staff Code of Conduct including whistleblowing, acceptable use of IT and staff/pupil relationships; - online safety; - the identity of the DSL and Deputy, - a copy of Part One KCSIE;

The school's Behaviour policy.

All staff will be required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents.

All staff will receive safeguarding and child protection training that is updated annually in accordance with the Westminster Children's Services. Such training, when arranged, takes priority over all other commitments.

Staff are trained to manage a report of child on child sexual violence and sexual harassment in accordance with Part 5 of KCSIE.

A register will be taken at each safeguarding and child protection training session.

The DSL and Deputy will receive updated training at least every two years, including where possible training in multi-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children, and safer recruitment. Such training, when arranged, takes priority over all other commitments.

Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety and Educational Visits policies are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

Where extended School activities are provided by and managed by the School, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips, we will check that effective child protection arrangements are in place. All staff are bound by the School's Educational Visits Policy when arranging and organising off-site trips.

In particular, those responsible for organising exchange visits where pupils are accommodated by host families are required to check host families and get appropriate assurances from partner schools overseas.

KCSIE clarifies in Annex E that in circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the school has the power to terminate such a homestay the school would be the regulated activity provider. Where the child's parent(s) or a pupil themselves arranges their own homestay, this would be a private arrangement, therefore, the school would not be the regulated activity provider.

Photography and images

The use of photographic images of pupils in publications and on the School website is covered under the school's GDPR policies. We co-ordinate use of pupil images in accordance with these and data protection law.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children we will: - only use images in accordance with the school's policy; - ensure that children are appropriately dressed; - encourage children to tell us if they are worried about any photographs that are taken of them.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Code of Conduct. From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

Photographs, digital images or videos of pupils may be taken by parents and family members, either on the School site or when pupils are involved in organized activities off site. Parents and family members are welcome to take photographs or videos of School events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet. Parents should not take photographs of their child or fellow pupils in the swimming pool or changing rooms.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

Flash photography can cause distress or trigger seizures in those with medical conditions and therefore should not be used.

Pastoral and Safeguarding Education

The School promotes the welfare of children through the Assembly programme, PSHEE curriculum and the school newsletter. Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm.

Bullying

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal,

ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by text or email or via other means using technology). The School is determined that no kind of bullying will be tolerated by pupils, parents or staff at the school.

The School's Anti-bullying policy is available via the website and has been developed mindful of the government guidance Preventing and Tackling Bullying (July 2017). All School staff, pupils and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedure in Appendix 3 (Allegations of abuse) of this policy.

If there is a concern that a child is at risk of serious harm from bullying behaviour, or that the cause or effect of the bullying is the significant impairment of health or development of a child (either alleged perpetrator or victim) the school's safeguarding procedures will be followed; the police will be informed in cases of serious harm.

The school's Anti-bullying policy applies to bullying behaviour outside of the school of which the school becomes aware.

Online Safety

The school's approach has been formed with the government guidance 'Teaching Online Safety in Schools' very much in mind.

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Pupils receive guidance on safe use of the web (including anti-bullying and the risks of cybercrime) through the ICT and PSHEE curricula and in assemblies. Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying Policy and procedures.

Chat rooms and social networking sites are sources of risk of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home.

The School WiFi for pupil use has appropriate security and filtering and is monitored by the DSL and Director Dr Ben Moore. Any inappropriate use will be followed up in line with this Safeguarding Policy.

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

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

commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Mobile Phones and devices

Mobile phone policy

All pupils need to learn to focus on their academic work for extended periods to ensure that they make good progress. Mobile phones are a constant source of distraction and we don't believe they help academic achievement. Pupils in years 7-11 are not allowed to use mobile phones **under any circumstances**, sixth formers are allowed some leeway as long as they remain responsible.

If parents wish to contact their child during the school day, they should ring the school office.

Use of mobile phones

- Mobile phones should not be used in school by pupils in years 7-11 under any circumstances. Pupils should switch them off as they enter the school in the morning and they must remain switched off until they leave. This includes break and lunch times.
- Using mobile devices for filming pupils is a serious offence and will be dealt appropriately which could include exclusion from school.
- No pupil is to use a phone during classes.
- Sixth form may use their phone responsibly in the study area but are expected to ensure it does not form a distraction from their work.
- Pupils seen using phone can expect to have their phones confiscated and returned at the end of the day. Persistent offenders may find that their phone will not be returned to them – parents may have to come to school to collect it.
- If there is a problem, staff should send for Senior Management for assistance.

Possession

- It is not possible to ban mobile phones completely, since parents believe they help their child's safety in coming to and from school.
- The phones are each pupil's personal responsibility and the school does not accept any responsibility for them if they are lost or stolen.
- No pupil may be in possession of a mobile phone in any examination.
- Where phones are confiscated, they will be placed in the school safe until they are returned.

Secure premises

The School will take all practicable steps to ensure that school premises are as secure as circumstances permit.

The school keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. The badge includes the Child Protection contact details on the back for ease and speed of communication.

Use of 'Reasonable Force'

A section in the School Behaviour policy outlines the use of 'Reasonable Force' and when it may be appropriate for staff to use reasonable force to safeguarding children and young people. The term covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. The DfE makes it clear that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils. KCSIE stresses that professional judgement should be used and action always depends on individual circumstances.

DfE guidance can be found here, and the school's policy should be consulted. This is included in training for all staff who are made aware of the need to log any use of reasonable force with the DSL.

SECTION FOUR: REVIEW OF POLICY AND PRACTICE

Monitoring and review

The principal and directors confirm efficient enforcement of this policy through an annual review by the DSL, and any deficiencies in these arrangements are to be addressed at once. It is the responsibility of both to confirm efficient enforcement review and updates may take place more frequently where necessary, and changes will be highlighted to staff, parents and pupils as appropriate.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the directors. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

An annual log of safeguarding incidents is kept by the DSL and reviewed by the principal and directors each July or August.

SECTION FIVE: SPECIFIC CHILD PROTECTION PROCEDURES

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the early indicators of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction.

Recognising abuse

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

The government document 'What to do if you're worried a child is being abused' (March 2015) can be helpful. The NSPCC website also provides very useful additional information on abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody (adult or child) may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a young or immature child home alone. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

It is important to note that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Staff should be aware that children may not feel ready to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.

There are different categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSIE and reproduced in Appendix 1 of this policy.

Safeguarding incidents and/or behaviours can be associated with factors outside school and can occur between children outside the school. All staff (especially the DSL and Deputy) should be considering the context within which such incidents occur. This is called Contextual Safeguarding which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to incidents, for example, of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

See the section below for more information on how other children can harm a child (child on child abuse).

When a concern is raised, the Designated Safeguarding Lead will consider whether there has been or is a likelihood of harm and whether there is a need for additional support from one or more

agencies; the former will be reported to the Children's Social Care immediately, the latter would lead to multi-agency assessment using the local processes.

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also at <http://www.nspcc.org.uk>.

Staff can also access Government guidance on the issues listed below via the GOV.UK website: bullying including cyberbullying child missing education child missing from home or care child sexual exploitation (CSE) children and the court system children with family members in prison domestic violence drugs fabricated or induced illness faith abuse female genital mutilation (FGM) Guidance for Schools, forced marriage gangs and youth violence gender-based violence / violence against women and girls (VAWG) homelessness hate honour-based abuse (HBA) mental health missing children and adults strategy private fostering Preventing Radicalisation and The Prevent Duty relationship abuse Government publication on sexting in schools and colleges trafficking Sexual violence and sexual harassment between children in schools and colleges.

Bales College-specific notes on the following:

Harmful behaviour by other children – child on child abuse

Children may be harmed by other children or young people. All staff should be aware of how child on child abuse may manifest itself: - bullying (including online cyberbullying); - physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm; - sexual violence and sexual harassment; - gender-based violence or touching; - sexual assaults and sexting (youth produced sexual imagery); - initiation, violence and rituals associated with initiations; - 'Upskirting'. Staff must also recognize that the absence of reporting of such incidents does not mean that they are not occurring and be ever-vigilant. Intimate personal relationships between pupils can also be open to elements of abusive behavior.

Government guidance on harmful sexual behaviours is available.

The School seeks to minimise the risk of child on child abuse through: clear supervision of pupils and regular education on high standards of courtesy and respect expected in the language and behaviour of pupils to one another, whether online or in person. Child on child abuse can be 'gendered' (for example, KCSIE states that it is more likely that girls will be victims and boys perpetrators) but staff are clear that all child on child abuse is unacceptable and will be taken seriously; so-called 'banter' is not an acceptable vehicle for unkindness or abusive behaviour towards others and specific PSHEE resources on banter and unkindness have been developed and are taught each year.

Specific education is carried out through assemblies about the risk of 'drink spiking' and how to protect oneself and look after each other to minimise the risk of drink spiking by another person. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures above. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and local services in accordance with the procedures in this policy.

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the local authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the local authority, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, subject to separately satisfied risk assessments for the pupil and an identified staff member will support the pupil.

The victim of child on child abuse will be given strong support, in co-ordination with their family or carer, via the pastoral system, school counsellor and using external experts where appropriate.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being “at risk”.

Notes on ‘Upskirting’ A new law is now in force which makes certain acts of voyeurism, commonly known as ‘upskirting’, a criminal offence. Victims may be male or female, adults or children. In the most serious cases, upskirting can result in a two-year prison sentence and the offender being placed on the sex offenders register. If a pupil is concerned that they have been the victim of upskirting by a fellow pupil, the school’s processes for dealing with peer-on-peer abuse should be followed. These are likely to involve speaking to the Designated Safeguarding Lead to raise concerns and agree next steps. Part 5 of KCSIE contains advice on handling allegations of sexual harassment, including whether a report to police may be required in parallel with a referral to children’s social care. In cases where there are reasonable grounds for suspecting that a device has been used to commit an offence, such as the taking of an upskirting photograph, staff are permitted to search pupils and files on the device, which must be delivered to the police as soon as reasonably practical without deleting relevant images.

If a pupil alleges that they have been the victim of upskirting by a member of staff, the school’s processes for dealing with allegations against staff members should be followed.

Domestic Abuse

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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

NSPCC- UK domestic-abuse signs symptoms effects. Refuge what is domestic violence/effects of domestic violence on children?

Sexting (Youth Produced Sexual Imagery)/Devices

Further detail about staff viewing pupils' devices or phones can be found in the school's behaviour policy. This sets out the context in which electronic devices may be searched by staff, and makes very clear that if a Child Protection issue is suspected, the device must be handed to the Designated Safeguarding Lead without any content first being viewed. Part 5 of KCSIE makes it clear that staff should not view or forward alleged illegal images of a child, and signposts advice for staff on what to do when viewing an image is unavoidable.

The DSL may be duty-bound to inform the local authorities and the Police.

The School employs a very wide range of measures to support the pupils and parents in making wise and sensible use of the internet. These include: assemblies and sessions within the PSHEE curriculum for all year groups, the Vice Principal announces at the start of each term that making, storing or distributing inappropriate images may lead to a pupil's place at the school being called into question. All of this takes place within a framework of work on self-esteem, confidence and treating people with kindness and respect, in 'real life' and on-line.

In addition to making the sanctions for involvement in sexting very clear, the school will provide appropriate pastoral support to the perpetrator and the victim.

Sexually active pupils

If a pupil reveals that he or she is sexually active it may be a child protection issue. The member of staff concerned should report this to the Designated Safeguarding Lead. They will then decide, having due regard to the pupil's age and maturity, whether this is indeed a child protection issue. If so, steps should be taken to arrange appropriate support. If sexual activity were to take place on school premises or on a school trip (when normal School rules always apply), this would also be considered a disciplinary matter).

The DSL will, when considering who needs to be informed, consider matters of the age of the pupils involved and the possibility of pupil-on-pupil abuse.

Sexual Violence and Sexual Harassment

The full government guidance is available through the link above in Section 5.2 and the relevant information can be found in Part 5 of KCSIE. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT and younger children are at greater risk.

Staff at Bales College should be aware of the importance of:

- making clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Staff must understand that dismissing or tolerating such behaviours risks normalising them.

Sexual violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Full legal explanation of what constitutes a sexual offence can be found in KCSIE, pages 87-89 and the definitions of sexual violence can be found on pages 10-12 of the DfE guidance, [Sexual violence and sexual harassment between children in schools and colleges](#)

What is consent

This vital question is covered in PSHEE in the school to ensure that pupils at School understand consent in an age-appropriate context. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; - sexual “jokes” or taunting; - physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature; and - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or deputy).

Child Sexual Exploitation (CSE)

The following definition is taken from the DfE ‘CSE: definition and guide for practitioners’ February 2017, which provides detailed information about CSE: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or

(b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Multi-agency working and information sharing are vital in tackling all forms of abuse, but it is clear that they are particularly important in identifying and preventing child sexual exploitation.

Female Genital Mutilation (FGM)

There is a specific legal duty for teachers to report to the police cases where an act of FGM appears to have been carried out on a girl under the age of 18. Staff should, in addition to alerting the police, discuss such a case with the DSL and involve children's social care as appropriate. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. This includes so-called 'honour' based violence. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM, such as Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian communities.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously.

Teaching staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Self-harming, eating disorders, anxiety or depression

It is recognised that some young people have a problem with self-harming/eating disorders/anxiety/depression and that this may be as a result of unhappiness in some aspect of their life (which may, in the worst case scenario, be linked to a child protection issue). Staff (especially those in positions of pastoral responsibility) should be vigilant and aware of the causes and symptoms of self-harming/eating disorders/anxiety/depression and should refer any cases to the DSL or Deputy as soon as possible.

Missing Pupils

Staff should be alert to the possible safeguarding implications of a pupil running away or deliberately going missing.

Unexplained absences of pupils on the child protection register

The Designated Safeguarding Lead must notify Social services if there is an unexplained absence of more than two days of a pupil who is on the child protection register. In such a case, where the child

is not at morning registration, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently.

Child who are absent from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

In order to safeguard pupils, Bales College undertakes to do the following: - Maintain an admission and an attendance register - Review the attendance percentages regularly to spot patterns of high absenteeism: an attendance percentage below 90% will trigger consideration as to the appropriate next course of action, whether pastoral, disciplinary, parental or child protection. - Inform the Local Authority (copying in, where the child is normally resident in another local authority, that local authority also) if a child is to be removed from the admission register at non-standard transitions, i.e. where a compulsory school-aged child leaves a school before completing the school's final year. The school has regard to Children Missing Education (2016) for information regarding the lawful grounds for removing a pupil and the information to be reported to the local authority. - Inform the local authority if any pupil fails to attend school regularly, or if any pupil has been absent without the school's permission for a continuous period of 10 days or more. - Endeavour to hold more than one emergency contact number for each pupil.

The Prevent Duty (see KCSIE Sept 2023)

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Bales College's responsibilities under the Prevent Duty involve four general themes, namely risk assessment, working in partnership, staff training and IT policies, and include the following: - Assessing the risk of pupils being drawn into terrorism, including extremist ideologies - Continuing to work in partnership with local authorities - Assessing the need for staff training - Ensuring the DSL undertakes Prevent awareness training - Ensuring that suitable filtering and monitoring is in place on School internet, and that School ICT training for pupils and staff includes the risks of radicalisation and the dangers of extremism..

Child Criminal Exploitation: county lines and serious violence

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

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

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

KCSIE stresses the need for staff to be aware of indicators which may signal that children are at risk or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff should be aware of the associated risks and understand the measures in place to manage them. Advice is available in the Home Office's Preventing Youth violence and gang involvement, and in the guidance entitled Criminal exploitation of children and vulnerable adults: county lines.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if the child is disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may sometimes come to the attention of school staff through the normal course of their interaction, such as through the admissions process or parental meetings, and promotion of learning activities, with children.

The school will notify the local authority to allow checks to be made that the arrangement is suitable and safe for the child.

What to do if you suspect a child is at risk of harm

If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, they must act on this immediately. Staff should refer to the DSL, or Deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral. The DSL should be informed as soon as possible.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns and pass it to the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of harm, including radicalisation, you should follow the advice in section below: 'If a child discloses information to you'.

Follow-up options to support a child include: - Managing support internally via the school's own pastoral support processes; - An Early Help assessment; - A referral to local services.

If a child discloses information to you

The NSPCC have created a very helpful resource entitled Let Children Know You're Listening (Helping adults respond to children disclosing abuse).

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely. - Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you. - Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'. - Do not be afraid of silences – remember how hard this must be for the child. - Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this. - At an appropriate time tell the child that in order to help them you must pass the information on. - Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused. - Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong. - Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day. - Follow the procedure outlined below:

Taking action: advice for staff - Write up your conversation as soon as possible on the record of concern form and hand it to the DSL. - Seek support if you feel distressed.

Note: best practice dictates that you should not write any notes whilst the pupil is speaking. Write up your notes immediately after the meeting, and give the DSL these notes, however rough. If an aide-memoire is required, only very brief phrases or notes should be jotted down - the priority is to listen, not to write down everything that is said, and the writing of any notes may lead a pupil to clam up. Remember that you should only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.

Taking action: Advice for staff

Key points to remember for taking action are: - in an emergency take the action necessary to help the child, for example, call 999; - report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 3 should be followed; - if the DSL is not available, ensure the information is shared with Deputy DSL that day. If there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to local children's services immediately. - never start your own investigation; - share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family; - seek support for yourself if you are distressed.

The immediate response to a report

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The school's initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

Staff should remember they should not:

- promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognise that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

- recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- inform the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Reporting directly to child protection agencies

In line with KCSIE, any staff member can make a referral to children's social care although where possible, there should be a conversation with the DSL to agree a course of action.

Staff should follow the reporting procedures outlined above. However, they may also share information directly with the Westminster Children's Service (Front Door for Families), the police or the NSPCC if: - the situation is an emergency and the DSL, or Deputy, the Principal - or if they are convinced that a direct report is the only way to ensure the child's safety. If, at any point, there is a risk of immediate serious harm to a child, and you are unable to share the information with the DSL, Deputy DSL or the most senior person in the school you can find to help you, a referral should be made to the local authority immediately.

Remember: anybody can make a referral.

When referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the team at Westminster Children's Services, using the local authority contact information in Section 7 of this policy.

They will require basic information from you such as: - Your name - Address - Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries, and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

Other ways to report your concerns: Referral to the local specialist services or Front Door for Families services may be appropriate, and these should be made in accordance with the referral threshold set by the WSCP. Call the local Police – 101 for non-emergency police Contact the NSPCC – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence, or text anonymously to 88858. Call the Westminster Prevent Lead Mark Chalmers 0207 641 6032, DfE Helpline for non-emergency advice on radicalisation: 020 7340 7264 and counterextremism@education.gsi.gov.uk

Notifying parents

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

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the local authority. This is also subject to advice from the LADO if the allegation involves a member of staff.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

Action by the DSL - Referral

The DSL (or in their absence, the Deputy DSL) will make a referral to Westminster Front Door for Families immediately if it is believed that a child has suffered or is at risk of suffering harm.

In situations where a pupil is not at risk of suffering harm but is instead in need of additional support from one or more agencies (referred to as a 'child in need'), the DSL will still liaise with the local authority in accordance with inter agency procedures and, depending on their advice, will complete an assessment form or engage with any other approach offered by the local authority (e.g. 'Team around the Child') to ensure assessment/referral of the pupil and/or his parents for appropriate social care services.

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authority on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the local authority again.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in Appendix 3.

In cases of possible radicalisation, the DSL will consider a referral to the Channel programme.

Confidentiality, sharing information and GDPR

When making decisions on what information to share and when, the most important consideration is whether information sharing is likely to safeguard and protect the child. Staff must consider if the information shared is necessary for the purpose for which it is being shared, ensure it 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 .

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Whilst the School understands the specific responsibilities arising from the General Data Protection Regulation and the Data Protection Act 2018 to process personal information fairly and lawfully, staff must be clear that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about information sharing cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Guidance in KCSIE 2023 specifically reminds staff who need to share 'special category personal data' that "the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information (see below) This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSL, Deputy DSL, the Principal or the nominated safeguarding director (Dr Ben Moore) depending on the subject of the concern. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The school will co-operate with police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2018.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and Children's Services to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be kept in a password-protected area.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

SECTION SIX: LINKS TO POLICIES TO BE USED FOR FURTHER GUIDANCE

Linked Policies The following documents are provided electronically to staff, paper copies can be provided on request: - Safeguarding & Child Protection policy - Anti-bullying policy - Behaviour policy, including Use of Reasonable Force policy - Staff Code of Conduct - Supervision policy - Complaints policy and procedure - Data protection policy - Drugs, Alcohol and Substance policy - Online Safety policy - First Aid Policy - SEND policy- ICT Acceptable Use Policy - Missing Pupil Policy - Whistleblowing Policy - The Prevent policy and Prevent Risk Assessment – Annex C KCSIE 2023

The guidance should be also be read alongside:

- statutory guidance Working Together to Safeguard Children;
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- departmental advice COVID-19: safeguarding in schools, colleges and other providers;
<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

SECTION SEVEN: LOCAL AUTHORITY CONTACT INFORMATION

Westminster Council Front Door for Families
Emergency Duty Service
0207 641 4000

Children's Services Team: **0207 641 4000**

Westminster Children's Safeguarding Partnership –

Safeguarding Manager (LADO) Jane Foster **0207 641 6108**

Email: jfoster1@westminster.gov.uk

Westminster Prevent Team;

Mark Chalmers Kiran Malik

MChalmers@westminster.gov.uk

0207 641 6032

Access to Children's Services team **020 7641 4000** 9am–5pm weekdays or
outside of these times the Emergency Duty Team on

020 7641 2388.

Emergency Duty Team **020 7641 2388.**

Other contact details

- NSPCC - Call Childline **0800 1111**
- FGM - Call Childline **0800 1111**
- If you are concerned about the immediate safety of a child, you should call 999 and ask for the police.
- Anti-Terrorism Hotline **0800 789 321**

SECTION EIGHT: APPENDICES

Appendix 1 Indicators of Abuse and Neglect

Knowing what to look for is vital in the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL or Deputy.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with each other.

The following (taken from KCSIE) are different types of abuse for which to be vigilant:

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section [] on this).

Domestic Abuse can encompass a wide range of behaviours, this abuse can be but is not limited to psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse.

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

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

In addition, staff should be aware of the signs, indicators and effects of harmful sexual behaviours. Information is available from the following sources:

- DfE: Sexual violence and sexual harassment between children in schools and colleges, Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (May 2018)
- NSPCC

Appendix 2 Recognising Indicators of Abuse

As part of training, staff are also provided with the following guidance for recognising the indicators of abuse:

Physical abuse,

Physical indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Emotional Abuse Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm.
- Flat or bald spots on head (infants) Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless excitable.

Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.

- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Child Sexual Exploitation Physical indicators:

- Tiredness, mood swings
- Bruising
- Sexually transmitted diseases
- Pregnancy

Behavioural indicators

- Sudden decline in school performance, punctuality, attendance
- In possession of expensive goods
- Going to places you know they cannot afford
- Age-inappropriate clothing
- Inappropriate sexualised behaviour
- Secretive Mixing with older people

Female Genital Mutilation

Physical indicators:

- Difficulty walking, sitting, standing

- Spend longer than normal in the bathroom
- Bladder or menstrual problems

Behavioural indicators:

- May talk about a 'special procedure' or 'special occasion to become a woman'
- Abroad for a prolonged period
- Unusual absence Reluctant to undergo normal medical examinations

Radicalisation There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

We might consider the following when looking for indicators, although no single checklist can be created in the case of radicalisation:

Disclosure: eg writing, drawings, poems, accessing extremist material, Expressions of support for terrorism: 'us' and 'them' language, justifying use of violence. Personal crisis: family tension, sense of isolation, changes in friendship group, low self-esteem, questioning identity, family, faith, belonging. Personal circumstance: migration, local community tension, a sense of grievance triggered by a personal experience eg of racism, discrimination

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement.

Appendix 3 -to be followed in the event of an Allegation of Abuse against a member of staff or volunteer or contractor

(taken from Part Four of KCSIE)

It is expected that all staff (including contractors) involved in the management of allegations of abuse made against a member of staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within the document: Keeping Children Safe in Education (2023). The following guidance is drawn directly from part four of KCSIE.

School staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

All staff should feel able to raise concerns about poor or unsafe practical and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Senior Management team. The School's Whistleblowing policy covers this in more detail.

The School's procedures

The School's procedures for dealing with allegations made against staff or volunteers or former staff or volunteers will be used where the member of staff or volunteer is alleged to have: - Behaved in a way that has harmed a child, 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 would pose a risk of harm if they work regularly or closely with children.

This procedure relates to members of staff who are currently working in the school regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police, and to the LADO as well.

If an allegation is made against a member of staff or volunteer, the school's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

All staff are informed as part of their training that any member of staff can make a referral, as specified in KCSIE.

The procedures to be followed in all such cases are outlined in Part 4 of KCSIE here:

Of particular significance are the sections in Part 4 of KCSIE on the use of suspension, appropriate information sharing, what to do on conclusion of a case and whether any lessons can be learned, regardless of the outcome of the case (see below).

Reporting an allegation against staff or volunteers

All allegations, complaints, concerns or suspicions against staff or volunteers, should be reported to the Vice Principal. In no case should an allegation, complaint, concern or suspicion be reported to the individual who is the subject of the concern, and neither should that individual be informed of the allegation, complaint, concern or suspicion at this stage.

All allegations, complaints, concerns or suspicions about the Vice Principal should be reported to the Principal. Under the interim circumstances of Dr Ben Moore as Vice Principal, the conflict of interest means that staff should make referrals direct to the LADO, rather than to the Principal, Mr

Bill Moore.

All allegations, complaints, concerns or suspicions about the Principal should be reported to the LADO using the contact information above.

Principal and DSL (assuming the allegation is not about the DSL) should discuss the allegation immediately with the LADO in order to consider the nature, content and context of the allegation and to agree a course of action. The LADO will be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria and the LADO may consult the Police and Children's Services as appropriate.

In borderline cases, or where there is room for doubt as to whether to make a referral, the case manager will still consult the LADO informally for advice before any investigation takes place and within one working day. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

No investigation will be undertaken into allegations without prior consultation with the LADO so as not to jeopardise statutory investigations. Borderline cases will be discussed informally with the LADO without naming the school or individual until the LADO has advised whether a referral is required. Any allegations not meeting the criteria will be dealt with in accordance with Westminster Safeguarding Children Board's procedures. All such cases will be handled within the school without delay.

All discussions with the LADO will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

Disclosure of information

The case manager will inform the accused person as soon as possible after consulting the LADO and will provide as much information as possible at that time.

The parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary

process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Where the LADO advises that a strategy discussion is needed, or police or Local authority services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from the LADO, police and children's social care services to agree the following: - who needs to know and, importantly, exactly what information can be shared; - how to manage speculation, leaks and gossip; - what, if any information can be reasonably given to the wider community to reduce speculation; and - how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Action to be taken against the accused

The school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. He/she will also be given access to welfare counselling and medical advice.

The case manager will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues.

Where an investigation by the police or local authority is unnecessary, the LADO will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken.

Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where: a. there is cause to suspect a child or other children at the school is or are at risk of harm or b. the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The school will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Criminal proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

Return to work

If it is decided that the person who has been suspended should return to work, the school will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The school will also consider how to manage the contact with the child[ren] who made the allegation.

DBS and TRA Referrals and Ceasing to use staff

NB There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met as per the guidance published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA.

Guidance for making referrals can be found on the DBS website (<http://www.homeoffice.gov.uk/agencies-public-bodies/dbs/>).

Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the directors and Principal without delay.

Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Vice Principal will consider whether to take disciplinary action in accordance with the school's behaviour and discipline policy.

Record keeping and references - Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the school's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

Review and Learning Lessons

In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation. The school's normal policies for data retention and destruction are therefore subject to these overriding responsibilities to cooperate with IICSA.

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This

should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 4 – Low level concerns policy

Part 4 of KCSIE 2023 has two sections covering the two levels of concerns and allegations:

1. Concerns / allegations that may meet the harm threshold, which are dealt with in Appendix 3 above..
2. Concerns / allegations that do not meet the harm threshold, referred to in KCSIE 2023 guidance as 'low-level concerns'. (KCSIE 2023 para 424 onwards). This appendix is the College's Low-level Concerns Policy, addressing the college's approach to these occurrences.

Purpose

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the college's values and expected behavior set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

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

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person. **As with any other allegations against staff, any concern must be reported to the Vice Principal** using a form available from the school office. The name of the person reporting must be noted, but the Vice Principal will respect wishes to remain anonymous as far as reasonably possible.

The Vice Principal will recorded and deal with reports promptly, appropriately and effectively. This approach will also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Records will be kept confidentially, held securely and in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The Vice Principal will review records so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified,

the Vice Principal will determine a suitable a course of action, either through the College disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, it will be referred to the LADO.

The Vice Principal will consider whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Responding to low-level concerns

If the concern has been raised via a third party, the Vice Principal will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.

The information collected will help the Vice Principal to categorise the type of behaviour and determine what further action may need to be taken.

This information will be recorded in writing along with the rationale for the decisions and action taken.

Reports will be retained at least until the individual leaves Bales College employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

Appendix 5 Action to be taken by Staff if a pupil goes missing from a School Trip:

1. Take an immediate head count to ensure that all other pupils are present. All adults and pupils should be asked to calmly explain when they last remember seeing the missing pupil.
2. An adult would search the immediate vicinity and if at a venue, the venue manager should be informed to arrange a search and potentially securing the venue.
3. Other pupils and staff might phone the pupil's mobile number (staff leading the trip will have a full list of contact details for the pupils on the trip)
4. The Vice Principal should be informed if the pupil is still missing.
5. A strategy would be agreed which may involve returning the rest of the group to school, or moving to a different location (if outside, for example) where the rest of the group can be safely supervised and ideally occupied.
6. The Vice Principal will phone the pupil's parents to explain what has happened and what steps have been taken. Depending on where the trip is, it may be appropriate for them to go to the venue, or to come to school.
7. Depending on the precise circumstances, either the Vice Principal or the staff with the group would call the police to notify them of a missing pupil. Precise information, timings and descriptions should be readily available before making this call.
8. A full record of all activities taken up to the stage at which the pupil was found would be made for the incident report.

NB: The Designated Safeguarding Lead may need to be informed, and he may need to inform the Local Partnership.

BALES COLLEGE **SAFEGUARDING CONTACTS**

Westminster Safeguarding Children Board, whose contact details are:

- Referral and Assessment Team Children's Services Team: 0207 641 4000
- AccesstoChildrenServices@westminster.gov.uk
- **Named LADO** – Organisations Manager & Local Authority Designated Officer
 - **Aqualma Daniel** : 07870 481712
 - Aqualma.Daniel@rbkc.gov.uk
- LADO- Duty Child Protection Advisor/LADO :0207 641 7668
- lado@westminster.gov.uk
- Westminster Prevent Team; Abdul Yusuf: Prevent Safeguarding Officer
Ayusuf1@Westminster.gov.uk
07817 054699
Kiran Malik: Prevent Coordinator Manager
kmalik@Westminster.gov.uk
Julie Knotts: Prevent Education Officer
jknotts@Westminster.gov.uk
07790 980223

If an allegation involves a member of staff seek guidance from Dr Ben Moore. If an allegation involves Dr Moore, seek guidance from William Moore or the LADO.

If an allegation involves the principal inform the LADO

Other contact details

- NSPCC - Call Childline 0800 1111
- FGM - Call Childline 0800 1111
- If you are concerned about the immediate safety of a child, you should call 999 and ask for the police.
- Anti-Terrorism Hotline 0800 789 321

Remember we don't investigate an allegation, nor promise confidentiality but seek advice

Appendix 7



BALES COLLEGE: CONCERN FORM

| | |
|-------------------------|-------------------|
| Child's Name: | Class: |
| Date: | Person Reporting: |
| Description of Incident | |
| | |
| DP Signature: | Action Taken: |
| Date: | |

Appendix 8

BALES COLLEGE PASTORAL REPORT FORM

Date: _____ Student: _____ Staff: _____

Issues discussed

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Actions

| |
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Follow up or further action

| |
|--|
| |
|--|

| |
|------|
| Name |
| Date |

Signed

| |
|---------|
| Student |
| Staff |