



SAFEGUARDING AND CHILD PROTECTION POLICY

This policy will be reviewed annually or in response to changes in legislation		
Created	August 2022	Designated Safeguarding Lead, Safeguarding Coordinator, Compliance Manager
Reviewed	September 2025	Designated Safeguarding Lead, Head of Compliance
Approved	September 2025	Head
Approved by Board		Proprietor (Board)

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Key school contacts

Safeguarding Team

Email: kensafeguarding@thomas-s.co.uk

Telephone number: 020 7361 6500 (Prep)

020 7937 0583 (Lower)

Telephone number (out of school hours or term term): 0207 361 6518

Designated Safeguarding Lead (DSL)

(including EYFS provision)

Alison Smith

Email: asmith@thomas-s.co.uk

Telephone number: 0207 937 0583

Deputy Designated Safeguarding Lead (DDSL)

(including EYFS provision)

Lydia Needham

Email: lneedham@thomas-s.co.uk

Telephone number: 0207 937 0583

Deputy Designated Safeguarding Lead (DDSL) and Online Safety Officer

Andrew Harding

Email: aharding@thomas-s.co.uk

Telephone number: 0207 361 6500

SENCo & Deputy Designated Safeguarding Lead (DDSL)

Marcel Pirret

Email: mpirret@thomas-s.co.uk

Telephone number: 0207 361 6500

Contact details of the Senior Leadership Team

Alex Matthews (Head)

Email: amatthews@thomas-s.co.uk

Telephone number: 0207 361 6500

Proprietor

Thomas's London Day Schools

Ben Thomas (CEO)

Email: bthomas@thomas-s.co.uk

Telephone number: 020 7978 0640

Nominated Safeguarding Governor

Sophie Rees

Email: srees@thomas-s.co.uk

Telephone number: 07989 347 736

Key external contacts

Local Authority Designated Officer(s) (LADO)

Aqualma Daniel

Telephone number: 020 7361 3013 / 0207 361 2120 / 0787 048 1712

Sally Smith

07967764794

Email:

KCLADO.Enquiries@rbkc.gov.uk

LADO referral form:

<https://www.rbkc.gov.uk/lscp/sites/default/files/atoms/files/LADO%20referral%20form.pdf>

Bi-Borough Safeguarding Lead for Schools and Education

Elaine Campbell

Telephone number: 020 7361 3000 / 07712 236508

Email: elaine.campbell@rbkc.gov.uk

Kensington and Chelsea children's social care department (Duty Line)¹

Telephone number: 0207 361 3013

Email: socialservices@rbkc.gov.uk

Out of hours emergency: 0207 373 2227

LSCP Multi-agency Safeguarding Hub (MASH)

Address: Frampton Street, London, NW8 8LF

Operating hours: M-F 09:00 - 17:00

Referral should be made to the relevant local authority who will refer cases to MASH.

Telephone:

(H&F) 020 8753 6610 / 020 8748 8588

(K&C) 020 7361 3013 / 0207 373 2227

(Westminster) 020 7641 4000 / 020 7641 6000

Email:

(H&F) familyservices@lbhf.gov.uk

(K&C) socialservices@rbkc.gov.uk

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

	(Westminster) access-to-children-services@westminster.gov.uk
Local Safeguarding Children Partnership	Telephone number: 07739 315 388 Website: https://www.rbkc.gov.uk/lscp/
FGM reporting - non-emergency police contact number	101
Prevent partners and advice about extremism	LBHF/RBKC Prevent team Telephone number: 020 8753 5727 Email: prevent@lbhf.gov.uk
	Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk https://www.gov.uk/guidance/counter-extremism
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk
NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk

1 Aims

- 1.1 This is the Safeguarding and child protection policy and procedures of Thomas's Kensington (the **School**).
- 1.2 The aims of this policy are as follows:
 - 1.2.1 to actively promote the well-being of pupils;
 - 1.2.2 to safeguard and promote the welfare of children, staff and others who come into contact with the School and to protect them from harm;
 - 1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;
 - 1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;
 - 1.2.5 to raise staff awareness about the School's safeguarding expectations;
 - 1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
 - 1.2.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it; and
 - 1.2.8 to promote a whole school culture of safety, equity and protection.
- 1.3 Every pupil should feel safe and protected from any form of abuse, neglect and exploitation.
- 1.4 All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.
- 1.5 Members of the School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.
- 1.6 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

- 1.7 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.
- 1.8 Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

2 Scope and application

- 2.1 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).
- 2.2 This policy applies at all times including where pupils or staff are away from the School, whether they are on school- arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.
- 2.3 This policy applies to core School activities and to out of hours and commercial activities.
- 2.4 This policy is designed to address the specific statutory obligations on the School to safeguard and promote the welfare of children.

3 Regulatory framework

- 3.1 This policy has been prepared to meet the School's responsibilities under the following legislation:
 - 3.1.1 Education (Independent School Standards) Regulations 2014;
 - 3.1.2 Education and Skills Act 2008;
 - 3.1.3 Children Act 1989;
 - 3.1.4 Children Act 2004;
 - 3.1.5 Childcare Act 2006;
 - 3.1.6 Safeguarding Vulnerable Groups Act 2006;
 - 3.1.7 Children and Social Work Act 2017;
 - 3.1.8 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
 - 3.1.9 Equality Act 2010
 - 3.1.10 Human Rights Act 1998.
 - 3.1.11 Domestic Abuse Act 2021
- 3.2 This policy has regard to the following guidance and advice:
 - 3.2.1 Statutory guidance:
 - (a) [Keeping children safe in education](#) (DfE, September 20254) (KCSIE);
 - (b) Early years foundation stage [statutory framework: for group and school-based providers](#) (DfE, July 2025December 2023);
 - (c) [Working together to safeguard children](#) 2023 (HM Government) (WTSC);

- (d) [Working together to improve school attendance](#) (DfE, August 2024)
- (e) [Disqualification under the Childcare Act 2006](#) (DfE, August 2018);
- (f) [Prevent duty guidance: England and Wales](#) (HM Government, 2023);
- (g) [Multi-agency statutory guidance on female genital mutilation](#) (HM Government, July 2020);
- (h) [Children missing education](#) (DfE, August 2024September 2016);
- (i) [Relationships education, relationships and sex education and health education guidance](#) (DfE, September 2021 and July 2025);
- (j) [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, August 2025February 2021); and
- (k) [PACE Code C 2019](#).

3.2.2 Non-statutory advice:

- (a) [What to do if you're worried a child is being abused: advice for practitioners](#) (HM Government, March 2015);
- (b) [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (DfE, May 2024);
- (c) [Behaviour in schools: advice for headteachers and school staff](#) (DfE, September 2022);
- (d) [Working together to improve school attendance](#) (DfE, February 2024);
- (e) [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, March 2024December 2020)
- (f) [Searching, screening and confiscation: advice for schools](#) (DfE, September 2022);
- (g) [Teaching online safety in schools](#) (DfE, January 2023June 2019);
- (h) [Harmful online challenges and online hoaxes](#) (DfE, February 2021);
- (i) [Digital and technology standards in schools and colleges](#) (DfE, March 20253)
- (j) [Generative AI: product safety expectations](#) (DfE, June 2025)
- (k) [Keeping children safe in out-of-school settings: code of practice](#) (DfE, April 2022)
- (l) [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);
- (m) [Virginity testing and hymenoplasty: multi-agency guidance](#) (DHSC, April 2024July 2022);

- (n) [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) (UK Council for Internet Safety, February 2019);
 - (o) [Educate Against Hate](#) (HM Government 2018); and
 - (p) [Equality Act 2010: advice for schools](#) (DfE, June 2018).
- 3.2.3 [Local Safeguarding Children Partnership \(Kensington and Chelsea, Westminster\)'s referral / threshold procedures / guidance.](#)
- 3.3 The following School policies, procedures and resource materials are relevant to this policy:
 - 3.3.1 Staff Code of Conduct;
 - 3.3.2 Staff ICT Acceptable Use Policy;
 - 3.3.3 Whistleblowing Policy;
 - 3.3.4 Safer Recruitment Policy;
 - 3.3.5 Online Safety Policy;
 - 3.3.6 Behaviour Policy;
 - 3.3.7 Anti-Bullying Policy
 - 3.3.8 ICT Acceptable Use Policy for Pupils;
 - 3.3.9 Attendance Policy, including Children Missing Education;
 - 3.3.10 Visitors Policy;
 - 3.3.11 Visiting Speaker Policy
 - 3.3.12 Risk Assessment Policy
 - 3.3.13 Supervision, Lost Child and Non-Collection Policy;
 - 3.3.14 Special Educational Needs and Disabilities (SEND) Policy;
 - 3.3.15 Health and Safety Policy;
 - 3.3.16 Relationships and Sex Education Policy;
 - 3.3.17 Medical Care Policy; and
 - 3.3.18 Pupil Mental Health and Wellbeing Policy.

4 Publication and availability

- 4.1 This policy is published on the School website.
- 4.2 This policy is available in hard copy on request.
- 4.3 A copy of the policy is available for inspection from the School Office during the School day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are also available to staff on the Staff Hub.

5 Definitions

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

- 5.1.1 References to the **Proprietor** are references to Thomas's London Day Schools (TLDS);. TLDS is governed on behalf of the Shareholders by the Board
- 5.1.2 References to **working days** mean Monday to Friday, even if the School is open on Saturdays, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;
- 5.1.3 **Safeguarding** is the protection of people from harm.
- 5.1.4 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
- (a) providing help and support to meet the needs of children as soon as problems emerge;
 - (a) protecting children from maltreatment, whether that is within or outside the home, including online;
 - (b) preventing impairment of children's mental and physical health or development;
 - (c) ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - (d) promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
 - (e) taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
- 5.1.5 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.
- 5.1.6 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.
- 5.1.7 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners
- 5.1.8 **Local Safeguarding Partners** means the three statutory safeguarding partners (local authority, Integrated Care Boards (ICBs) and the chief officer of police for an area any part of which falls

within the local authority area) who make arrangements to work together with appropriate relevant agencies, and with other partners locally including education providers and childcare settings, to safeguard and promote the welfare of local children, including identifying and responding to their needs. Education providers play a vital role in sharing and contributing to key information about children, including attendance data, exclusions, concerns about abuse, neglect, exploitation, and wider social and environmental factors including extra-familial contexts, which are a key aspect of keeping children safe. The local arrangements relevant to the school can be found in Appendix 5.

- 5.1.9 References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult. Further information about the School's response to allegations of child-on-child abuse are provided in Appendix 3.
- 5.1.10 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers, Proprietors and nominated Governors unless otherwise indicated.
- 5.1.11 Senior Leadership Team (**SLT**) comprises of the Head, Deputy Head, Head of Lower School (DSL Deputy Head Pastoral); Deputy Head, People and Culture and Deputy Head, Teaching and Learning.
- 5.1.12 Reference to the Board includes the three directors, nominated Safeguarding Governor and any individuals appointed in an advisory capacity.

6 Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership

- 6.1 The Proprietor has overall responsibility for all matters which are the subject of this policy, including:
 - 6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to relevant guidance issued by the Secretary of State;
 - 6.1.2 strategic leadership responsibility for the School's safeguarding arrangements; and
 - 6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.
- 6.2 The Proprietor:
 - 6.2.1 appoints a Nominated Safeguarding Governor to lead on safeguarding matters, whose contact details are set out in the School contacts list at the front of this policy;

- 6.2.2 ensures that all members of the Board of Directors and Group Board receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;
- 6.2.3 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;
- 6.2.4 ensures that appropriate arrangements are in place for the whole Board to discharge their function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding; and
- 6.2.5 establishes appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively. This includes attendance by the DSL at twice-termly TLDS Safeguarding Committee meetings.
- 6.3 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	DSL, supported by the Head of Compliance	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	DSL	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	DSL	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedures and review of their implementation.	Proprietor (Board)	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Proprietor (Board)	Before commencement of arrangement and thereafter at least annually

6.4 *Head*

- 6.4.1 The Head is responsible for the overall management of the School and for the management of concerns and allegations about staff.
- 6.4.2 The Head ensures that the School's policies and procedures, adopted by the Proprietor (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation) are understood, and followed by all staff.²

6.5 *Designated Safeguarding Lead (DSL)*

- 6.5.1 The DSL is a senior member of staff of the School's leadership team³ with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the School. The DSL's role covers the whole school including the Early Years Foundation Stage
- 6.5.2 The DSL has the appropriate status and authority within the school to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.
- 6.5.3 The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of [PACE Code C](#) and any other code of practice apply.
- 6.5.4 The DSL will take
 - (a) lead responsibility for pupils who are looked after children.
 - (b) lead responsibility for pupils' attendance as School Attendance Champion.
 - (c) lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School has in place, including in consultation with IT assessing whether any generative AI technology meets the appropriate standards.
 - (d) lead responsibility for overseeing Prevent and is responsible for ensuring all staff receive appropriate Prevent training and induction.

² Paragraph 78 KCSIE 2023.

³ Paragraph 103 KCSIE 2025 states it is not appropriate for the Proprietor to be the DSL.

- 6.5.5 The DSL will also undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff. Refer to the Pupil Wellbeing Policy for further details
- 6.5.6 If the DSL is unavailable the activities of the DSL will be carried out by a Deputy DSL. The Deputy DSLs' details are also set out in the School contacts list at the front of this policy.

7 Specific safeguarding duties in relation to children

- 7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility. 'Children' includes everyone under the age of 18.
- 7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.
- 7.2.1 The School will:
- (a) understand its role in the safeguarding partner arrangements (<https://www.rbkc.gov.uk/lscp/>) and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Local Safeguarding Children Partnership the key details of which are contained in Appendix 5.
 - (b) be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;
 - (c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;
 - (d) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback using tools such as the mood meter and the virtual worry box;
 - (e) take active steps to promote school attendance;
 - (f) allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff code of conduct;
 - (g) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

- (h) design and operate procedures which, so far as possible, ensure that staff pupils and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;
- (i) prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;
- (j) be alert to children who are at potentially greater risk of harm including children who need a social worker and children requiring mental health support;
- (k) be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse, neglect or exploitation;
- (l) encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;
- (m) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- (n) assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- (o) identify pupils who may be vulnerable to radicalisation and know what to do when they are identified; and
- (p) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area. See Appendix 5 for more details.
- (q) consider the physical location of the school and the local area with regards to embassies, busy main roads and public parks, especially when pupils are travelling to different locations. Staff must be vigilant to day-to-day potential risks such as public demonstrations, road works and high numbers of tourists.
- (r) adhere to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting.

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

8 Contextual Safeguarding

- 8.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL (and DDSLs), should consider the context within which such incidents and/or behaviours occur.
- 8.2 The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 8.3 The School will share as much information as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

9 Reporting obligations of staff

9.1 Reporting obligations generally

- 9.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.
- 9.1.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- 9.1.3 All staff have a duty to:
- (a) report any concerns they may have about the safety and / or well-being of pupils;
 - (b) report any concerns they may have about the safety and / or well-being of other persons associated with the School;
 - (c) report any safeguarding concerns about staff or anyone else associated with the School; and

- (d) where they make a referral directly to children's social care, follow up on any such reports to ensure that appropriate action is or has been taken.

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

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

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

- (a) The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;
- (b) See Appendix 2 for guidance about what to do when receiving a disclosure and section 23 below relating to recording a concern.

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

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

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

9.3 *What if the DSL is unavailable?*

9.3.1 The DSL or the DDSLs should always be available to discuss safeguarding concerns and may be contacted on the out of hours number at the front of the policy in relation to any safeguarding concerns out of School hours.

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

9.3.3 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 10 below for further details on making a referral.

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

9.4 *Action by the DSL*

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

- (a) managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 7 below);
- (b) undertaking an early help assessment (which generally requires parental consent) (see 8 below); or
- (c) making a referral for statutory services (see 9 below).

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

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

10 *Managing support for pupils internally*

10.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 14 and the School's Risk Assessment Policy.

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

11 *Contextual Safeguarding*

11.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL (and DDSLs), should consider the context within which such incidents and/or behaviours occur.

11.2 The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare.

- 11.3 The School will share as much information as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

12 Early help assessment

- 12.1 Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by CSC in consultation with the family.
- 12.2 The School understands that providing early help is more effective in promoting the welfare of children than reacting later.
- 12.3 The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
- 12.3.1 is disabled or has certain health conditions and has specific additional needs;
 - 12.3.2 has special educational needs (whether or not they have a statutory education, health and care plan);
 - 12.3.3 has a mental health need;
 - 12.3.4 is a young carer;
 - 12.3.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - 12.3.6 is frequently missing / goes missing from care or from home;
 - 1.1.1 has experienced multiple suspensions, is at risk of being permanently excluded from schools, college and in alternative provision or a pupil referral unit;
 - 12.3.7 is at risk of modern slavery, trafficking sexual or criminal exploitation;
 - 12.3.8 is at risk of being radicalised or exploited;
 - 12.3.9 has a parent or carer in custody, or is affected by parental offending;
 - 12.3.10 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - 12.3.11 is misusing alcohol or other drugs themselves;
 - 12.3.12 is looked after or has returned home to their family from care;
 - 12.3.13 is at risk of "honour-based" abuse such as Female Genital Mutilation or Forced Marriage;

12.3.14 is a privately fostered child; and

12.3.15 is persistently absent from education, particularly on repeated occasions and/or prolonged periods - including persistent absences for part of the school day.

12.4 A member of staff who considers that a pupil may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 15 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Local Safeguarding Children Partnership menu of early help services and their referral threshold guidance and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

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

1.1 Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children.

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

13 Making a referral

13.1 Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care and if appropriate the police is made immediately

13.2 "Harm" is the "ill treatment or impairment of the health or development of a child".⁴ Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

13.3 The contact details for the School's CSC team (and for neighbouring boroughs) are set out at the front of this policy. Referrals should be made to the local authority where the pupils reside.

13.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC.

13.5 Statutory assessments

13.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the

⁴ Section 31 Children Act 1989

person making the referral will be asked to contribute to this process. Statutory assessments include:

- (a) **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.
- (b) **Children suffering or likely to suffer significant harm:** Local authorities with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

- 13.6 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 242 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.
- 13.7 Parental consent is not required for referrals to statutory agencies but staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
 - 13.7.1 personal details of the child including the child's developmental needs;
 - 13.7.2 detailed information about the concern;
 - 13.7.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 13.8 If the referral is made by telephone, this should be followed up in writing.
- 13.9 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.
- 13.10 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 13.11 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

14 Allegations against pupils - child-on-child abuse

- 14.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour

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

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

15 *Extra-familial harm*

- 15.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.
- 15.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.
- 15.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 15.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

16 *Risk assessment*

- 16.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 16.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.
- 16.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 16.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

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

- 17.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- 17.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.
- 17.3 *Allegations made and or / concerns raised about staff and others in School*
- 17.3.1 The School has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any Other Adult which may affect the safety and welfare of children.
- 17.3.2 The procedures in this policy apply to staff who pose a risk of harm to children or who may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. The policy and procedures are set out below and follow the guidance in Parts 1 and 4 of KCSIE.
- 17.3.3 The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.
- 17.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.
- 17.5 Staff should refer to the Low Level Concerns Policy for information about identifying and reporting low level concerns.

18 Informing parents

- 18.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. We aim to be transparent and work with the family. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.
- 18.2 In all cases, the DSL will be guided by the Local Safeguarding Children Partnership referral threshold document. The DSL will refer to other borough documentation where necessary if a child does not reside in RBKC.
- 18.3 See also Section 15 for details about the disclosure of information where an allegation has been made against a member of staff.

19 Additional reporting

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

19.1.1 Health and Safety Executive

- (a) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the Accident, Incident and Near Miss Reporting Procedures for further details about this.

19.1.2 Disclosure and Barring Service (DBS)

- (a) A referral to the DBS will be made promptly if the criteria are met. See Section 15 for further details.

19.1.3 Teaching Regulation Agency (TRA)

- (a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he / she had not resigned. See Section 15 for more details.

19.1.4 Ofsted

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

19.1.5 Insurers

- (a) The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (b) Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

20 Safer recruitment and supervision of staff

20.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate Safer Recruitment Policy.

20.2 The School maintains a single central register of appointments for all staff.

- 20.3 Staff connected to the School's early years and later years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Safer Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the School.
- 20.4 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Visiting Speakers Policy.

21 Use of mobile technology

- 21.1 The School's policy on the use of mobile technology, including phones and cameras and other electronic devices with image and sharing capabilities, in the School, is as follows:
- 21.1.1 the School's ICT Acceptable Use Policy sets out the expectations on all pupils;
 - 21.1.2 pupils are not permitted to bring in mobile phones or any device with a camera facility or sharing capabilities unless approved by the Head, as outlined in the ICT Acceptable Use Policy.
 - 21.1.3 all staff (including staff in the EYFS setting) should use mobile devices and cameras, or other electronic devices with image and sharing capabilities in accordance with the guidance set out in the staff ICT Acceptable Use Policy
 - 21.1.4 parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during certain events as outlined in the Policy on Taking, Using and Storing Photographs of Pupils. Parents should be reminded that the publication of any images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
 - 21.1.5 visitors may bring mobile devices onto the premises but are not permitted to take photographs unless express permission is agreed with the Head or DSL.
- 21.2 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.
- 21.3 The School's approach to online safety is set out in the School's Online Safety Policy and ICT Acceptable Use Policy.

22 Training

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

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

22.3 The School maintains written records of all staff training.

22.4 All training will be carried out in accordance with Local Safeguarding Children Partnership procedures where possible.

22.5 *Induction*

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

- (a) this policy;
- (b) the role, identity and contact details of the DSL and their Deputies;
- (c) the Behaviour Policy for pupils;
- (d) the Anti-Bullying Policy, which includes details of the School's policy on online bullying and prejudice-based and discriminatory bullying ;
- (e) the Staff Code of Conduct including social media, reporting low level concerns and staff/pupil relationships; the Whistleblowing Policy and ICT Acceptable Use Policy;
- (f) the safeguarding response to children who are absent from education particularly on repeat occasions and/or prolonged periods or children missing education;
- (g) the School's approach to online safety;
- (h) safeguarding training in accordance with Local Safeguarding Children Partnership's procedures including guidance on managing a report of child-on-child harmful sexual behaviour;
- (i) a copy of Part 1 and Annex B of KCSIE for school leaders and staff who work directly with children (or, for staff who do not work directly with children, Annex A); and
- (j) appropriate Prevent duty training.

22.6 *Safeguarding training*

22.6.1 School leaders and all staff will receive a copy of this policy and Part 1 and where appropriate, Annex B of KCSIE, and will be required to confirm that they have read and understand these.

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

- 22.6.3 The Head and all staff members (including those working in EYFS) will undertake appropriate safeguarding training which will be updated at least annually and following consultation with the Local Safeguarding Children Partnership. In addition, all staff members will receive informal safeguarding and child protection updates including online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) via email and staff meetings on a regular basis and at least annually.
- 22.6.4 All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which will cover all areas set out in Annex C of the EYFS Statutory Framework: Criteria for effective safeguarding training.
- 22.6.5 Staff development training will also include training on online safety, child-on-child abuse, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.
- 22.6.6 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
- 22.6.7 Members of the Board receive safeguarding training (including online safety which, amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction. This training will equip with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated. All members of the Board will be expected to read Part 2 of KCSIE
- 22.6.8 The Nominated Safeguarding Governor will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. .
- 22.6.9 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time and should, where appropriate, refer to the School's out of hours /out of term safeguarding arrangements.

22.7 *Designated Safeguarding Lead (DSL)*

- 22.7.1 The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.
- 22.7.2 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.
- 22.7.3 Prevent duty training will be consistent with the Government's Prevent training for schools. See [Educate Against Hate](#) (HM Government, 2018) for further details.

22.8 *Teaching pupils about safeguarding*

- 22.8.1 The School teaches pupils about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- 22.8.2 The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- 22.8.3 Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through Relationships and Sex Education and PSHE education appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships, boundaries and consent, stereotyping prejudice and equality, body confidence and self-esteem and how to recognise harm.
- 22.8.4 Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.
- 22.8.5 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe on-line and when accessing remote learning. The Proprietor has ensured appropriate filters and monitoring systems are in place (see the Online Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning.
- 22.8.6 The School keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them

aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

23 Arrangements for use of school premises for non-school activities

- 23.1 Where services or activities are provided under the direct supervision or management of the School, this policy will apply in relation to any safeguarding concerns / allegations.
- 23.2 Where services or activities are not under the direct supervision or management of the School, the School will seek assurances that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.
- 23.3 The School has in place arrangements for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.
- 23.4 The School will ensure that safeguarding requirements are included in any arrangement for the use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.
- 23.5 When considering the safeguarding arrangements providers have in place the School will have regard to the DfE's non-statutory guidance [Keeping children safe in out-of-school settings](#).

23.6 Alternative Provision

- 23.6.1 Where a student attends an alternative provision, the School will ensure that:
 - (a) appropriate safeguarding checks have been carried out;
 - (b) there is written information about any arrangements that may put a child at risk; and
 - (c) it is always aware of where a child is based during school hours and will have a record of the address and any subcontracted or satellite site is held.
- 23.6.2 The School will carry out regular reviews of any placements to ensure they continue to be safe and meet the needs of the child.
- 23.6.3 If there is a safeguarding concern, the placement will be reviewed immediately and ended if necessary.

24 Monitoring and review

- 24.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Head of Compliance as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

- 24.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Head, Nominated Safeguarding Governor who will report to the Proprietor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.
- 24.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.
- 24.4 The Proprietor will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks its pupils face.
- 24.5 The DSL will work with the Nominated Safeguarding Governor to prepare a written report commissioned by the Proprietor. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:
- 24.5.1 inspection of records or feedback from external agencies including the Designated Officer(s);
 - 24.5.2 reports of ISI inspections;
 - 24.5.3 the outcome of any relevant complaints, claims or related proceedings; and
 - 24.5.4 press reports.
- 24.6 The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

25 Record keeping

- 25.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely in separate pupil profiles in CPOMs. These should include:
- 25.1.1 a clear and comprehensive summary of the concern;

- 25.1.2 details of how the concern was followed up and resolved; and
- 25.1.3 a note of any action taken, decisions reached and the outcome.
- 25.2 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.
- 25.3 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 25.4 Insofar as pupil records are concerned:
 - 25.4.1 Staff must record all concerns about a pupil on CPOMs. Guidance on record keeping is set out in Appendix 2.
 - 25.4.2 The DSL will create a record in CPOMs following a report to them of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

26 Information sharing and multi-agency working

- 26.1.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.
- 26.1.2 The School understands that sharing information, including on Prevent is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK data protection legislation provides a framework to ensure that personal information is shared appropriately.
- 26.1.3 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK data protection legislation. The School will also have regard to its data protection policies. The School's Head of Compliance will work with the DSL as appropriate to determine what should be disclosed.
- 26.1.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

- 26.1.5 Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 26.1.6 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.
- 26.1.7 The School will aim to be as transparent as possible by telling families what information they are sharing and with whom, provided that it is safe to do so.
- 26.1.8 Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt.
- 26.1.9 In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

Appendix 1 **Forms of abuse and neglect and specific safeguarding risks**

1 Abuse and neglect

- 1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).
- 1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Definitions of abuse and neglect

- 2.1 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context 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 by another child or children.
- 2.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 2.3 **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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 2.4 **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 (also known as child-on-child abuse) in education and all staff should be aware of it. The school policy and procedures can be found in Appendix 3.
- 2.5 **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.

3 Signs of abuse

- 3.1 Possible signs of abuse include, but are not limited to:
- 3.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;
 - 3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
 - 3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
 - 3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

- 3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;
 - 3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
 - 3.1.7 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and
 - 3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.
- 3.3 The Local Safeguarding Children Partnership can provide on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused](#) (March 2015) provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

4 Specific safeguarding issues

- 4.1 Statutory guidance acknowledges the following as specific safeguarding issues:
- 4.1.1 child abduction and community safety incidents;
 - 4.1.2 children and the court system;
 - 4.1.3 children being absent, repeatedly and/or prolonged periods, children missing from education (see section 5 below);
 - 4.1.4 children with family members in prison;
 - 4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);
 - 4.1.6 county lines (see section 8 below);
 - 4.1.7 modern slavery and the national referral mechanism;
 - 4.1.8 cybercrime; (see section 10 below)
 - 4.1.9 domestic abuse (see section 11 below);
 - 4.1.10 homelessness;
 - 4.1.11 so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 12, 13 and 14 below);
 - 4.1.12 preventing radicalisation (see section 15 below);

- 4.1.13 child-on-child abuse (see Appendix 3);
 - 4.1.14 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);
 - 4.1.15 upskirting (see section 19 below).
- 4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Children who are absent from education

- 5.1 Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, "honour-based" abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.
- 5.2 In accordance with the EYFS Statutory Framework, the School will consider patterns and trends in a child's absences and their personal circumstances and use their professional judgement when deciding if a child's absence should be considered as prolonged. Consideration must be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns must be referred to local children's social care services and/or a police welfare check requested.
- 5.3 Where reasonably possible the School will hold more than one emergency contact for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.
- 5.4 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).
- 5.5 This will assist the local authority to:
- 5.5.1 fulfil its duty to identify children of compulsory school age who are missing from education; and
 - 5.5.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse,

neglect or radicalisation or involvement with serious violent crime.

- 5.6 The School shall inform the local authority of any pupil who:
 - 5.6.1 fails to attend School regularly; or
 - 5.6.2 has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (but no less frequently than once per calendar month).
- 5.7 The School will inform the local authority of any pupil who the School has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness.
- 5.8 When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance Working together to improve school attendance.

6 Elective Home Education (EHE)

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

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

- 7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve:
 - 7.1.1 exchange for something the victim needs or wants e.g. money, gifts or affection; and / or
 - 7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and / or
 - 7.1.3 through violence or threat of violence to victims (and their families).
- 7.2 Children can be exploited by individual adults or groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.
- 7.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

- 7.4 The victim may have been exploited even if the activity appears consensual.
- 7.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 7.6 Some of the following can be indicators of both CSE and CCE, including children who:
 - 7.6.1 appear with unexplained gifts, money or new possessions;
 - 7.6.2 associate with other young people involved in exploitation;
 - 7.6.3 suffer from changes in emotional well-being;
 - 7.6.4 misuse drugs and alcohol;
 - 7.6.5 go missing for periods of time or regularly come home late; or
 - 7.6.6 regularly miss school or education or do not take part in education.
- 7.7 Children who have been exploited will need additional support to help maintain them in education.
- 7.8 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 7.9 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:
 - 7.9.1 have older boyfriends or girlfriends; or
 - 7.9.2 suffer from sexually transmitted infections or become pregnant.

8 County lines

- 8.1 County lines⁵ is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store

⁵ See the Home Office's [Advice to schools and colleges on gangs and youth violence and its Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information.

and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

- 8.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 8.3 Number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
 - 8.3.1 go missing (from school or home) and are subsequently found in areas away from their home
 - 8.3.2 have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
 - 8.3.3 are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
 - 8.3.4 are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
 - 8.3.5 are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
 - 8.3.6 owe a 'debt bond' to their exploiters
 - 8.3.7 have their bank accounts used to facilitate drug dealing.
- 8.4 Additional reporting duties:
 - 8.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;
 - 8.4.2 where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism ⁶ should be considered.

9 Serious violence

- 9.1 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:
 - 9.1.1 Increased absence from school;
 - 9.1.2 a change in friendships or relationships with older individuals or groups;

⁶ For further information and a definition of trafficking, see: [National Crime Agency - modern slavery and human trafficking](#) and the DfE and Home Office guidance: [Safeguarding children who may have been trafficked](#).

- 9.1.3 a significant decline in performance;
- 9.1.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- 9.1.5 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).
- 9.2 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

10 Cybercrime

- 10.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).
- 10.2 Cyber-dependent crimes include:
 - 10.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;
 - 10.2.2 denial of Service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;
 - 10.2.3 making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.
- 10.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- 10.4 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

11 Domestic abuse

- 11.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.
- 11.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.
- 11.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 11.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

12 So-called "honour-based" abuse

- 12.1 All forms of so-called "honour-based" abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.
- 12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

13 Female genital mutilation (FGM)

- 13.1 FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
- 13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be

found on pages 38-43 of the [Multi-agency statutory guidance on FGM](#) (HM Government, July 2020) (pages 61-63 focus on the role of schools).

- 13.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.
- 13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.
- 13.5 Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

14 Forced marriage

- 14.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- 14.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found in the [Multi-agency statutory guidance for dealing with forced marriage and multi agency guidelines: handling case of forced marriage](#) (HM Government, February 2023).
- 14.3 Staff should speak to the DSL if they have any concerns. The above guidance outlines the role of schools in detecting and reporting

forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fcdo.gov.uk for advice and information.

15 Radicalisation and the Prevent duty

- 15.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 15.2 The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 15.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:
- 15.4 **Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"*
- 15.5 **Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*
- 15.6 **Terrorism:** *"an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."*
- 15.7 Although there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 15.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those susceptible to radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be

susceptible and act proportionately which may include the DSL making a Prevent referral.

- 1.1 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to extremist ideology and radicalisation and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021) The DfE and Home Office's briefing note [The use of social media for online radicalisation](#) (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

16 Child-on-child abuse

- 16.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.
- 16.2 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

17 Online safety

- 17.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- 17.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 17.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - 17.3.1 **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
 - 17.3.2 **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - 17.3.3 **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending

and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and

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

17.4 The School ensures compliance with the DfE's [Filtering and monitoring standards for schools](#) by:

17.4.1 Identifying and assigning roles and responsibilities to manage filtering and monitoring

17.4.2 Reviewing the filtering and monitoring provision at least annually

17.4.3 Blocking harmful and inappropriate content without unreasonably impacting teaching and learning

17.4.4 Having effective monitoring strategies in place that meet our safeguarding needs.

17.5 The School refers to the DfE guidance on [Generative AI: product safety expectations](#) to support the use of generative AI safely in education at the School.

18 *Sharing nudes and semi-nude images and videos*

18.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk.

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

18.3 The School treats all incidents of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

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

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

- 18.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
 - 18.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or
 - 18.5.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.
- 18.6 Where viewing an image is unavoidable:
- 18.6.1 viewing should take place on School premises wherever possible;
 - 18.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
 - 18.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
 - 18.6.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
 - 18.6.5 any member of staff who views an indecent image should be given appropriate support.
- 18.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 18.8 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 18.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 18.10 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

- 18.11 Where a pupil receives unwanted images, the School should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
- 18.12 The UK Council for Internet Safety's advice note [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.
- 18.13 The Home Office has published [Indecent images of children: guidance for young people](#) (Home Office, November 2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

19 Upskirting

- 19.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 19.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.
- 19.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

20 Special educational needs and disabilities or certain health conditions

- 20.1 The School welcomes pupils with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and EDI policy.
- 20.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

- 20.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;
- 20.2.2 pupils with SEND or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
- 20.2.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content/behaviour in school without understanding the consequences; and
- 20.2.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required;
- 20.3 The School should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

21 *Looked after children, previously looked after children, and all other children with an allocated social worker*

- 21.1 The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
 - 21.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
 - 21.1.2 contact arrangements with birth parents or those with parental responsibility;
 - 21.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.
- 21.2 The DSL maintains these details, including contact details of the child's social worker. See paragraph 4.5.4 in the policy for the DSL's role in relation to pupils who are looked after children.

22 *Care leavers*

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

23 *Children who are lesbian, gay, bisexual or gender questioning*

- 23.1 A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be

targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

- 23.2 When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.
- 23.3 Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Appendix 2 Concerns about a child - guidance for staff

1 *Receiving a disclosure*

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.
- 1.3 Take the pupil to the School Nurse or Medical Lead if there is a medical need and do not examine the injury yourself.
- 1.4 Reassure the pupil they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- 1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.7 Pass on the record when reporting the concern in accordance with this policy.

2 *Recording a concern*

- 2.1 Staff must record all concerns in CPOMs.
- 2.2 Records should be factual and should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event / concern / conversation;
 - 2.2.3 a clear and comprehensive summary of the event/concern / conversation;
 - 2.2.4 details of how the concern was followed up and resolved,
 - 2.2.5 a note of any action taken and by whom, decisions reached and the outcome;
 - 2.2.6 the name and position of the person making the record.

- 2.3 Staff complete a form in CPOMs which should be submitted when reporting the matter in accordance with this policy. The form can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 Use of reasonable force

- 3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. "Reasonable" in these circumstances means using no more force than is needed.
- 3.2 Staff should refer to Appendix 4 of this policy, the School's Behaviour policy and the Staff code of conduct for more detailed guidance about the use of reasonable force.

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

1 **Child-on-child abuse**

- 1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online. This includes, but is not limited to:
 - 1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
 - 1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);
 - 1.1.3 physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);
 - 1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;
 - 1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 1.1.6 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - 1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;
 - 1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
 - 1.1.9 initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element);

2 The School's approach to child-on-child abuse

- 2.1 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that abuse is being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).
- 2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.
- 2.3 All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the School's behaviour and anti-bullying policies, so that appropriate action can be taken.
- 2.4 Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the school's care and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.

3 Harmful Sexual Behaviour (HSB)

- 3.1 Where the misconduct may constitute **sexual violence** ⁷ (rape, assault by penetration, sexual assault ⁸ or causing someone to engage in sexual activity without consent) or **sexual harassment** (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. Sexual violence and/or sexual harassment (SVSH) is never acceptable.
- 3.2 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.
- 3.3 HSB can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually

⁷ When referring to sexual violence, the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above.

⁸ Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault).

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

- 3.4 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.
- 3.5 The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which provides support, advice and information on how to prevent HSB, internet safety, sexual development and preventing child sexual abuse. Confidential early support can also be found for young people at [The Lucy Faithfull Foundation's](#) "Shore Space", a confidential chat service to assist young people who are concerned about their own or someone else's sexual thoughts or behaviour.

4 Management of allegations of child on child SVSH

4.1 The initial report

- 4.1.1 The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.
- 4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.
- 4.1.3 They should:
 - (a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
 - (b) where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
 - (c) where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young

people. The key consideration is for staff not to view or forward illegal images of a child;⁹

- (d) explain the next steps and how the report will be progressed;
- (e) make a written record of the report (recording the facts as the child has presented them);
- (f) inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 *DSL's considerations*

4.2.1 Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 *School's considerations*

4.3.1 The School will consider:

- (a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the school may have to take action to protect other children;
- (b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour¹⁰ has been displayed;
- (c) the ages and developmental stages of the children involved and any imbalance between them;
- (d) if there is an intimate personal relationship between the children;
- (e) whether there are any ongoing risks to those involved;

⁹ School staff can search pupils with their co-operation for any item. If a pupil refuses to co-operate staff may use reasonable force to search pupils if they have reasonable grounds for suspecting a pupil is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case by case basis. See <https://www.gov.uk/government/publications/searching-screening-and-confiscation> for further information.

¹⁰ Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent - may be helpful here.

- (f) the time and location of any incident, and any action required to make the location safer;
- (g) the wider context.

4.3.2 Before deciding how best to support and protect those involved, the School will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The School will make a proportionate response to these matters in light of the circumstances and the factors identified above. And decide, if any, further action is appropriate.

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

5 *Investigations and findings*

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

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

6 Additional support

- 6.1 Resources from the Centre of Expertise on Child Sexual Abuse may support the DSL to identify and respond to [concerns of child sexual abuse and abusive behaviours](#).

Appendix 4 Local arrangements

1 **Early help resources**

- 1.1 The [Early Help for Families Service](#) works with children and families to ensure they progress in their normal settings and provide targeted services to help manage emerging difficult circumstances before they develop into more serious issues.
- 1.2 The School can refer a pupil to the service by completing a [referral form](#).

2 **Local thresholds**

- 2.1 Thomas's Kensington is situated in the London borough of Kensington and Chelsea and therefore follows the guidance of the bi-borough Local Safeguarding Children Partnership (LSCP), of the Royal Borough of Kensington and Chelsea and Westminster City Council
- 2.2 The [Threshold of Need guide](#), is for practitioners in all agencies working with children, to assist in decision making about which agency should be involved in helping families have different levels of need.

3 **Referral forms**

- 3.1 Referrals should be made to the relevant local authority who will refer cases to MASH. Details for the relevant local authorities are detailed in the Key Contacts at the front of the policy.
- 3.2 Referrals to the LADO should be made via the email (LADO@lbhf.gov.uk) or telephone. Contact details are included at the front of this policy.