ENLIGHTENED | ASPIRATIONAL | ENTREPRENEURIAL | INDIVIDUAL | COMPASSIONATE

Bermondsey, London www.galleywall.co.uk

Safeguarding Policy

Last reviewed: October 2024, MAB and SCE v1.0

Section 1: Aims

A   School Aims

i   Appropriate action is taken in a timely manner to safeguard and promote children's welfare

ii   All staff are aware of their statutory responsibilities with respect to safeguarding

iii   Staff are properly trained in recognising and reporting safeguarding issues

Section 2: Legislation and Statutory Guidance

A   Related Policies

i   This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education (2024)](#) and [Working Together to Safeguard Children (2023)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

ii   Part 3 of the schedule to the [Education (Independent School Standards) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

iii   [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

iv   Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

v   [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

vi   [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

vii   Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

viii   [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

ix   [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (EHCR)

x   [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual

orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

xi   The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

xii   The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

xiii This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

xiv   This policy also complies with our funding agreement and articles of association.

xv   This policy complies with the London Borough of Southwark safeguarding procedures.

Section 3: Definitions

A   Safeguarding and promoting the welfare of children means:

i   Providing help and support to meet the needs of children as soon as problems emerge

ii   Protecting children from maltreatment whether that is within or outside the home, including online

iii   Preventing impairment of children's mental and physical health or development

iv   Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

v   Taking action to enable all children to have the best outcomes

B   Child protection

i   Activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

C   Abuse

i   A form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

D   Neglect

i   A form of abuse and is 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. Appendix 1 defines neglect in more detail.

E   Sharing of nudes and semi-nudes

i   Sharing of nudes and semi-nudes(also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

F   Children

i   Everyone under the age of 18.

G   Safeguarding partners

i   The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

H   Victim

i   Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

I   Alleged perpetrator(s) and perpetrator (s)

i   Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Section 4: Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

i	Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
ii	Are young carers
iii	May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
iv	Have English as an additional language (EAL)
v	Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
vi	Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
vii	Are asylum seekers
viii	Are at risk due to either their own or a family member's mental health needs
ix	Are looked after or previously looked after (see section 12)
x	Are missing or absent from education for prolonged periods and/or repeat occasions
xi	Whose parent/carer has expressed an intention to remove them from school to be home educated

Section 5: Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

i	Behaviour policy
ii	Pastoral support system
iii	Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
iv	Healthy and respectful relationships
v	Boundaries and consent
vi	Stereotyping, prejudice and equality
vii	Body confidence and self-esteem
viii	How to recognise an abusive relationship (including coercive and controlling behaviour)

ix The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support

x What constitutes sexual harassment and sexual violence and why they're always unacceptable

B All Staff

All staff will:

i Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](), and review this guidance at least annually

ii Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

iii Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

iv Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

i Our systems that support safeguarding, including this child protection and safeguarding policy; the staff handbook, the supply teacher pack, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education

ii The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

iii The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

iv What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

v The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

vi New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm

vii   The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

viii   The fact that children can be at risk of harm inside and outside of their home, at school and online

ix   The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

x   That a child and their family may be experiencing multiple needs at the same time

xi   What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

C   The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

In an emergency, the DSL and/or DDSLs may be contacted by phone or e-mail.

When the DSL is absent, the DDSLs will act as cover.

There is a DDSL available during out-of-hours activities.

The DSL will be given the time, funding, training, resources and support to:

i   Provide advice and support to other staff on child welfare and child protection matters

ii   Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

iii   Contribute to the assessment of children

iv   Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

v   Have a good understanding of harmful sexual behaviour

vi   Have a good understanding of the filtering and monitoring systems and processes in place at our school

vii   ~~Add if your DSL is your Prevent lead: Make sure that staff have appropriate Prevent training and induction~~

viii   ~~Add if your DSL is a lead practitioner for the local authority: Act as a lead practitioner for the local authority~~

The DSL and deputy DSLs will also:

i   Liaise with local authority case managers and designated officers for child protection concerns as appropriate

ii   Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

iii   Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

iv   Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSLs are set out in their job descriptions.

D   The governing board

The governing board will:

i   Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

ii   Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation

iii   Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

iv   Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

v   Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

vi   Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

vii   Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

viii   Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

The Headteacher must make sure:

i   The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

ii   Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

iii   The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

iv   The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns)

about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

v   That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

vi   Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

vii   Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

viii   Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

ix   Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

E   The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

i   Ensuring that staff (including temporary staff) and volunteers:

ii   Are informed of our systems that support safeguarding, including this policy, as part of their induction

iii   Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

iv   Communicating this policy to parents/carers when their child joins the school and via the school website

v   Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

vi   Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

vii   Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

viii   Ensuring the relevant staffing ratios are met, where applicable

ix   Making sure each child in the Early Years Foundation Stage is assigned a key person

x   Overseeing the safe use of technology, mobile phones and cameras in the setting.

Section 6: Confidentiality

At Galleywall, data and information relating to safeguarding is shared when this is necessary to protect the safety or welfare of a child or staff member, or to enable a staff member to safeguard a child effectively, or to pass information on to wider authorities/parents and carers where applicable. Our approach to confidentiality adheres to these principles;

i   Timely information sharing is essential to effective safeguarding

ii   Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

iii   The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

iv   If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

v   Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

vi   If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

vii   There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

viii   The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

ix   The DSL should consider that:

x   Parents or carers should normally be informed (unless this would put the victim at greater risk)

xi   The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

xii   Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

xiii   Regarding anonymity, all staff will:

xiv   Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

xv   Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved

xvi   Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

xvii   The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

xviii   If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

xix   Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

Section 7: Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

i   Is disabled

ii   Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

iii   Is a young carer

iv   Is bereaved

v   Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

vi   Is frequently missing/goes missing from education, care or home

vii   Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

viii   Is at risk of being radicalised or exploited

ix   Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

x   Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

xi   Is misusing drugs or alcohol

xii   Is suffering from mental ill health

xiii   Has returned home to their family from care

xiv   Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

xv   Is a privately fostered child

xvi   Has a parent or carer in custody or is affected by parental offending

xvii   Is missing education, or persistently absent from school, or not in receipt of full-time education

xviii   Has experienced multiple suspensions and is at risk of, or has been permanently excluded

xix   Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

xx   Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

B   If a child is suffering or likely to suffer harm, or in immediate danger.

i   Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

ii   Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

iii   To report directly to Southwark Council; make a referral to MASH here

iv   Member of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

v   More information can be found on the GOV.UK website; https://www.gov.uk/report-child-abuse-to-local-council

C   If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

i   Listen to and believe them. Allow them time to talk freely and do not ask leading questions

ii   Stay calm and do not show that you are shocked or upset

iii   Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

iv   Find out as much detail as possible without asking leading questions e.g. DO ask 'What do you mean? Or 'Where', Who' or What' questions, DO NOT ask questions that may lead the child to an answer such as 'Does he hit you on the arm?'

v   Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

vi   Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

vii   Add the account to CPOMS (our digital recording platform) and inform the DSL or a deputy DSL. If you are a visitor and do not have access to CPOMS, please sign and date the written account and pass to a DLS or deputy DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

i   Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

ii   Not recognise their experiences as harmful

iii   Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

D   If you can discover that FGM has taken place or pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

i   Is informed by a girl under 18 that an act of FGM has been carried out on her; or

ii   Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures. Members of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

E   If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger

i   Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

ii   Where possible, speak to the DSL first to agree a course of action.

iii   If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

iv   Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

The school can make referrals to Early Help themselves or on the instruction of parents/carers through Southwark Council.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Members of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

F   If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

i   Think someone is in immediate danger

ii   Think someone may be planning to travel to join an extremist group

iii   See or hear something that may be terrorist-related

G   If you have concerns about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
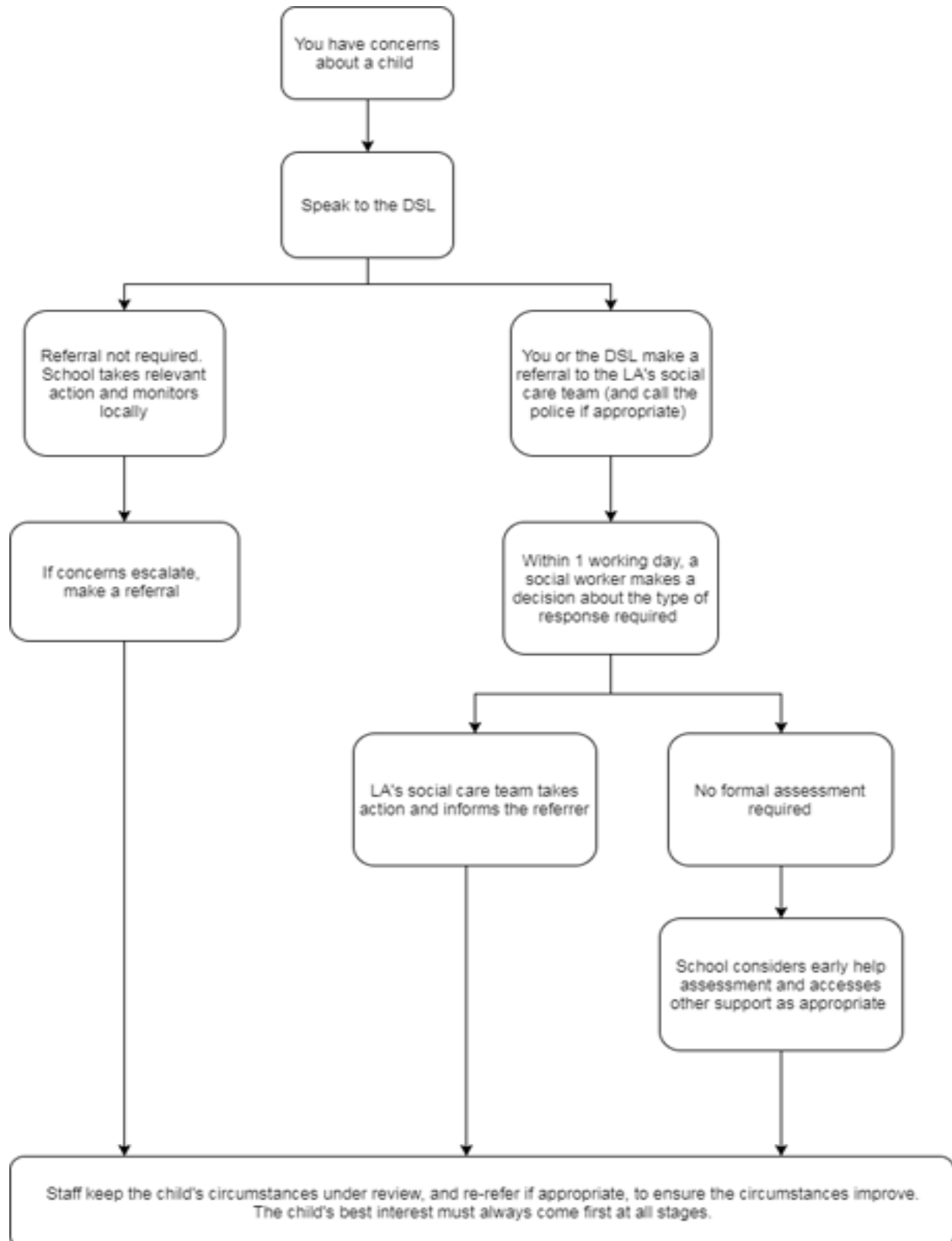
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

You have concerns about a child

Speak to the DSL

Referral not required. School takes relevant action and monitors locally

If concerns escalate, make a referral

You or the DSL make a referral to the LA's social care team (and call the police if appropriate)

Within 1 working day, a social worker makes a decision about the type of response required

LA's social care team takes action and informs the referrer

No formal assessment required

School considers early help assessment and accesses other support as appropriate

Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

H   If you have concerns about a staff member, volunteer, supply teacher or contractor

i   If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the chair of governors.

ii   The Headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

iii   Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).

iv   If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

v   Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

I   Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

i   Is serious, and potentially a criminal offence

ii   Could put pupils in the school at risk

iii   Is violent

iv   Involves pupils being forced to use drugs or alcohol

v   Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

i   You must record the allegation and tell the DSL, but do not investigate it

ii The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

iii The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

iv The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

i Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

ii Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

iii Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

iv Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

v Ensure staff reassure victims that they are being taken seriously

vi Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

vii Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

viii Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

ix Ensure staff are trained to understand:

x How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

xi	That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
xii	That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
xiii	Children can show signs or act in ways they hope adults will notice and react to
xiv	A friend may make a report
xv	A member of staff may overhear a conversation
xvi	A child's behaviour might indicate that something is wrong
xvii	That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
xviii	That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
xix	The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
xx	That they should speak to the DSL if they have any concerns
xxi	That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

i	Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
ii	There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

J   Sharing of nudes and semi-nudes (sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the emergency number.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding online relationships as part of our RSE programmes. Teaching may cover the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images

- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

K   Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Annex 1: Safeguarding Posters

All posters are here: https://www.galleywall.co.uk/safeguarding3/113528.html