KEW COLLEGE PREP

Safeguarding and Child Protection Policy

This policy applies to the whole school including the EYFS

Reviewed by:	**Approved by:**	**Updated by:**
The Full Governing body	Title: Head	Title: DSL / Governor for Safeguarding
Date:	Date: 3 September 2026	Date: 13 August 2026

This policy will be reviewed by the governing body annually or earlier if it is considered necessary

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1. Introduction and policy aims

Kew College Prep has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

The health, safety and well-being of all our pupils are of paramount importance to all the staff at Kew College Prep. We are committed to providing an environment in which children feel welcomed, safe, valued and respected. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities. Kew College Prep is committed to anti-discriminatory practice and recognises that racism, faith-targeted abuse and other forms of discriminatory behaviour can constitute safeguarding concerns and cause harm in their own right. All staff adopt the attitude of **'it could happen here'** and that **anyone** can make a direct referral if they feel their concerns are not being addressed.

We aim to make sure that:

- The school has a clear process in place, which is shared with and followed by all members of the school community when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse or neglect, such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, pupils, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

2. Definitions and abbreviations

Safeguarding: the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online.

This includes:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Taking action to ensure that children have the best outcomes
- Making sure that the way children grow up is consistent with providing safe and acceptable care.
- Preventing barriers to children's mental and physical health or the way they develop.

Child protection: the processes carried out to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff: all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

Child: everyone under the age of 18.

Parent: birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Statutory: what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

The local safeguarding partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by KRSCP or the London Child Protection Procedures and Practice Guidance.

Abbreviations used in this policy

AfC: Achieving for Children
CAMHS: Children and Adolescent Mental Health Services
DSL: Designated Safeguarding Lead – person responsible for safeguarding in school
Deputy DSL: Deputy Designated Safeguarding Lead – deputy person responsible for safeguarding in school
DBS: Disclosure and Barring Service checks (formerly - Criminal Records Bureau)
EYFS: Early Years Foundation Stage
FGM: Female Genital Mutilation
GDPR: General Data Protection Regulation
HBA: Honour Based Abuse
ISI: Independent Schools Inspectorate
IWF: Internet Watch Foundation
LADO: Local Authority Designated Officer for safeguarding of children (also known as the Designated Officer in some authorities)
KCP: Kew College Prep
KCSIE: Keeping Children Safe in Education
KRSCP: Kingston and Richmond Safeguarding Children's Partnership
PSHE: Personal, Social, Health and Economic Education
SENDCO: Special Educational Needs and Disabilities Co-ordinator

SEND: Special Educational Needs and Disabilities
SLT: Senior Leadership Team
SPA: Single Point of Access

3. Key personnel

3.1 At Kew College Prep:

Designated Safeguarding Lead (DSL) & Head of Pastoral Care: Sarah Jones
Deputy DSL and Head: Jane Bond
Deputy DSL and Head of Early Years: Lee-Anne Tizard
Chair of Governors: Andrea Samuelson
Named Governor for Safeguarding (including filtering and monitoring)**:** Dr Zohya Pavlu
Special educational needs and disabilities coordinator (SENDCo): Paloma Forde and Rachel Williams
Designated Teacher for looked after children: Sarah Jones
Designated Teacher for Young Carers: Sarah Jones
Designated Governor for looked after children: Dr Zohya Pavlu

Contact number for all above: 020 8940 2039
Email: safeguarding@kewcollegeprep.com or enquiries@kewcollegeprep.com
Email for Chair of Governors: chairofgovernors@kewcollegeprep.com

3.2 Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the Single Point of Access (SPA) website.

3.3 If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

If a child needs support in the borough of Hounslow, referral can be made via the portal using the following link: Hounslow Children's Portal. Adults can also call 020 8583 6600 for help or advice.

If a child needs support in the borough of Ealing, you can all 020 8825 8000 or email Ealing Safeguarding Children Partnership (ESCP) at ECIRS@ealing.gov.uk.

This government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK

Go to section 6 of this policy for in-school procedures.

3.4 Local authority designated officer (LADO)

Every local authority has a legal responsibility to have a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the Head and the chair and safeguarding lead of governors to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: Submit LADO referral form

4. The law (legislation) and statutory guidance

This policy has been adapted from the Kingston and Richmond Safeguarding Children Partnership (KRSCP) Model Child Protection Policy 2026-2027.

In addition to KRSCP's arrangements (which can be accessed here) and the London Child Protection Procedures and Practice Guidance, Kew College Prep also follows the laws and statutory guidance below:

Keeping children safe in education 2026 guidance, from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

The Prevent Duty Guidance places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism and to safeguard children from radicalisation and extremist influences.

Early years foundation stage statutory framework: for group and school-based providers 2026 sets the standards that all early years providers, such as nurseries, must meet to make sure that children learn and develop well and are kept healthy and safe.

Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 set out who is disqualified from working with children.

Working Together to Safeguard Children 2026 is statutory guidance published by the government which sets out how practitioners and organisations should work together to safeguard and promote the welfare of children. It places children at the centre of safeguarding practice and provides the framework for effective multi-agency working

Working together to improve school attendance 2026 statutory guidance produced by the government applying to all schools from August 2024. It sets out the expectation for schools, trusts and local authorities to work in partnership to improve attendance and safeguard pupils.

Education Act 2002, section 175/The Education (Independent School Standards) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 places a duty on independent schools and local authorities to keep children safe and promote the welfare of pupils.

The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.

The Children Act 1989 Care Planning, Placement and Case Review sets out what responsibilities education settings have for children looked after by the local authority.

The Children's Wellbeing and Schools Act 2026 introduces reforms intended to strengthen the safeguarding and welfare of children, improve information sharing between agencies and support earlier intervention where children may be at risk of harm.

The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our pupils with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.

The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, bi-phobic or transphobic bullying or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure pupils

have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

Data Protection Act 2018 and UK General Data Protection Regulation (GDPR)

Further, and more specific, legislation is covered throughout this policy in the relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we need to make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

5.1 The **Board of Governors**

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- Safeguarding is a standing item on the agenda for governor meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources, and support needed to carry out the role effectively. A governor with senior board level lead takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link governor). There is an appointed designated teacher for looked after children who is appropriately trained.
- The Board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting pupils with SEND.
- The Board monitors how effectively the school supports pupils with protected characteristics and considers whether any groups of pupils are disproportionately affected by safeguarding concerns, attendance issues or barriers to learning.
- Child protection files are maintained as set out in Annex B of KCSIE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff read the appropriate part(s) of KCSIE. All governors sign to say they have read and understood KCSIE and this policy.

- Pupils are taught about keeping themselves and others safe, including when online.
- The Board does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assigns a member of the SLT and a governor to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence and when safeguarding concerns coincide There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The chair of governors will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- Alcohol is not consumed by staff on school trips, or at events on or off site.
- All members of the Board of Governors receive safeguarding training at induction, which is regularly updated.

5.2 Governor for Safeguarding

- They meet regularly with the DSL and visit the school, making suitable enquiries regarding the provision for safeguarding, which allows them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and Head, and make sure it is submitted to the KRSCP.
- They feed back their findings following school visits and meetings with the DSL, which includes termly reports.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

5.3 The Head

The Head is responsible that the following are in place:

- This policy and other safeguarding-related policies and procedures (such as the Good Behaviour and Discipline Policy and Staff Code of Conduct) are shared at induction, and understood by all staff, including temporary staff and volunteers.
- Staff receive regular, updated safeguarding training.
- Parents and carers are aware of this policy and the most recent version is on the school website.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent. Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for pupils to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- Appropriate staff ratios are in place, where relevant and applicable.
- Each child in the EYFS is assigned a key person.

- Appropriate arrangements are put in place for the supervision of staff who have contact with children, parents/carers and families
- Furthermore, the Head becomes the 'case manager' when an allegation is raised about a member of staff (see Appendix 2) and make the final decision regarding all low-level concerns.

5.4 The designated safeguarding lead (DSL)

The DSL has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's SLT. Kew College Prep has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to

- reading and following KCSIE
- always being available during school hours for staff in school to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of pupils, including taking part and/or supporting other staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of the school's role in making referrals about suspected abuse, neglect and exploitation
- understanding the importance of sharing information, including referring cases to relevant agencies (for example, children's services, the police, the Channel Programme and/or the DBS) when appropriate, and supporting staff who make referrals directly
- understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements
- keeping the Head up to date with safeguarding issues
- having the lead responsibility for online safety, and oversight and checking the effectiveness of filtering and monitoring systems and their reports. This includes ensuring staff are alert to emerging safeguarding risks including the spread of misinformation, disinformation, conspiracy theories and AI-generated content.
- being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019

- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date and kept as per section 8 (Annex B of KCSIE).
- making sure all staff have access to this policy (and the wider safeguarding procedures) and that the policy is available publicly and reviewed annually
- making sure that all staff (including third-party staff and contractors) have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part(s) of KCSIE
- Ensuring that safeguarding assurances are obtained from any alternative provision provider used by the school, including written confirmation that staff checks are complete and the school will be informed of any changes which may place pupils at risk
- working alongside the governing body and Head to update and review procedures and how they are being implemented, including jointly completing an annual safeguarding self-audit and submitting it to KRSCP
- promoting the educational outcomes of pupils who have or had a social worker, by sharing information about child protection issues with teacher and SLT where appropriate
- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them
- having strategic oversight of attendance, recognising that persistent absence can be a safeguarding risk; this entails working with staff and governors and external partners to identify patterns of absence, help to address barriers and ensure pupils who are persistently or severely absent receive appropriate support and intervention.

5.5 Deputy designated safeguarding leads

- are trained to the same standard as the DSL
- will take on the DSL's responsibilities if they are unavailable. If the DSL is long-term absent, a deputy will temporarily take over as the DSL

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSIE.

5.6 IT provider

- maintains the filtering and monitoring systems
- provides regular filtering and monitoring reports
- completes actions following concerns or checks to the system
- ensures that filtering and monitoring systems are regularly reviewed using the DfE's 'Plan technology for your school' service as guidance.

5.7 All school staff

- read the relevant part of KCSIE annually and sign to confirm this

- have a responsibility to provide a safe environment in which children can learn
- follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems
- follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure
- will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and LADO
- create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns
- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the Staff Code of Conduct

What staff need to know is covered in the training section of this policy.

6. What to do if you have concerns about a child's welfare

If staff have any concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the What to do if you're worried a child is being abused government guidance alongside the school's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with, or aware of, safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident you have been involved in.** The names of the DSL and deputy are clearly advertised in the school.

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

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral. For children's services' contact details, **click here**, or go to page 5. If you make the referral, you will update the DSL or a deputy as soon as is practically possible.

6.1 Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- children may not feel ready or know how to tell someone they are being harmed
- the child may not realise what is happening to them as harmful

- they may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for an individual or family, rather than take what is being said on face value or making assumptions. We encourage staff to ask the pupil if they are OK or if they can help in any way.
A child who makes a disclosure may have to tell their story more than once, such as to the police and/or social workers. At Kew College Prep, we know how important it is that a child's first experience of talking to a trusted adult about a worry they have is a positive one.

6.2 Handling a disclosure

- listen to them carefully and believe in what they are saying. Do not be afraid of silence moments
- be careful not to express your own views or feelings and stay calm
- do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where? and remember to use TED: "Tell me", "Explain" and "Describe". Otherwise, you may invalidate your evidence (and the child's) in any later court proceedings
- if there are injuries or marks on the child, do not examine the child intimately or take pictures
- reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner
- do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted
- tell the child it is not their fault, and you are taking them seriously
- explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help

6.3 After a child has made a disclosure

- write up the conversation as soon as possible on Secure Notes on SchoolBase
- make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible
- do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to
- get support for yourself if you need it

6.4 Recording a disclosure or safeguarding concern

- record the date, time, place and persons present
- use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it

- record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map
- keep any original notes you have made on file by recording on SchoolBase. Any paper notes should be handed to the DSL to be securely kept.
- do not ask children to make written statements themselves or sign records
- notes or drawings that a child has offered will be kept safe in a locked cabinet in a secure location in the DSL's care

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

The flowchart on page 22, explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, speak to a member of the SLT or take advice from children's services, if necessary.

The DSL and deputy are aware of the London safeguarding children partnership's threshold document, which will be used to inform their response to any safeguarding concern. If you are dissatisfied with the response from the DSL or children's services, you should ask for the decision to be reconsidered, giving your reasons for this. If you remain dissatisfied, follow the local escalation procedure Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership.

6.5 Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At Kew College Prep, we are keen to work with families to provide support as soon as a problem becomes visible at any point in a child's life. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set 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.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family – discuss with the relevant Early Help Resilience Network to ensure all identified needs are supported effectively and they get multi-agency support. Achieving for Children's early help assessment tools and plans can be found here. The partnership's Early Help Strategy sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. The school recognises the importance of identifying needs at the earliest possible stage and working collaboratively with children, families and partner agencies to provide coordinated support and prevent concerns from escalating. A referral to children's services may be required if the child's situation does not appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware that any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children identified in Part One, paragraph 18 of KCSIE 2026.

6.6 Referral to children's services

Concerns about a pupil or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. If a referral is needed, then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral the pupil's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership procedure will be used, where necessary.

Kew College Prep participates in Operation Encompass and may receive notifications from the police regarding domestic abuse incidents which affect a pupil, enabling timely safeguarding and pastoral support to be provided.

6.7 If a child is at risk of female genital mutilation (FGM) or it has taken place

FGM is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

6.8 Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions.'

All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

6.9 Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. staff will speak to the DSL or a deputy and follow local safeguarding procedures.

6.10 Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your DSL or equivalent immediately using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or deputy) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a pupil if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the government's Searching, screening and confiscation: advice for schools guidance.

The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who

heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- whether there is an immediate risk to any child or young person
- if a referral should 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 child or 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 children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

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

- the incident involves an adult.
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- what they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent.
- the images involve sexual acts and any pupil in the images or videos is under 13.
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, if they are presenting as suicidal or self-harming.
- they become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or deputy) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

6.10.1 Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child, parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network

6.10.2 Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance.

There is further information in the Sharing nudes and semi-nudes section of this policy.

6.11 Child-on-child abuse, including sexual violence and sexual harassment

Responding to allegations of child-on-child abuse

- Follow the 'handling a disclosure' procedure set out above. You must make a record of the allegation and inform the DSL or a deputy. If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the SLT and/or contact the relevant children's services e.g. the SPA in Kingston and Richmond.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.

2. Complete an early help assessment.

3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.

4. The police will still be informed of any criminal offences, even if the child is aged under the criminal age of responsibility. The police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, any discussions had and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our Good Behaviour and Discipline Policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. This may include but is not limited to the following:

- A kindness plan for child who displayed the behaviour
- Regular meetings with the Head of Pastoral Care
- Social Skills groups conducted through the Learning Enrichment Department
- Meetings with parents
- Referrals to Early Help
- Support from external providers

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Hackett tool (below). We will request the support of other agencies, such as children's services and the police, if necessary.

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal	• Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence	• Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator • Sadism

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. **Hackett Inappropriate:** Manage internally using the Good Behaviour and Discipline Policy and pastoral support.
2. **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault. We will follow the When to call the police guidance.

The management of children and young people with sexually harmful behaviour is complex. Kew College Prep will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made, and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case-by-case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all pupils (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or from future harm
- the time and location of the incident and any action that can make the school safer

Support will be tailored to the needs of each child and may include pastoral support, emotional wellbeing support, risk management plans, parental engagement, Early Help intervention and referrals to appropriate external agencies. Support will be offered both to the child who has experienced the behaviour and the child who has displayed the behaviour.

6.12 Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or

malicious, we will consider whether any disciplinary action is appropriate according to our Good Behaviour and Discipline Policy.

6.13 If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against the DSL's or a deputy's duty to protect them and other children on a case-by-case basis. 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, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. Although the age of criminal responsibility is ten, if the child accused is under ten, a referral to the police will still be made. The police will take a welfare, rather than a criminal justice approach, in these cases.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up which staff need to know and any support which will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and/or a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

6.14 Concerns about mental health

Mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk or suffering abuse, neglect or exploitation. The school and staff have an important role in supporting the mental health and wellbeing of all our pupils. It is key that staff are aware of how children's experiences can impact on their mental health, behaviour and education. All staff will be trained in supporting the signs that a child may be suffering with poor mental health and the school recognises the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes. If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately.

If a child requires urgent mental health support but is not in immediate danger, advice will be sought via NHS 111 and the mental health option. Where a child presents as being at immediate risk of serious harm, emergency services will be contacted via 999 or the child will be taken to A&E as appropriate.
Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental

health illness. Where necessary, the DSL or a deputy will make a referral to the CAMHS single point of access for Kingston and Richmond here.

6.15 Concerns about extremism and radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Extremism is the vocal or active opposition to our fundamental British values. See radicalisation and extremism in Appendix 1 for more information.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger,** contact the police on 999 or the anti-terrorist hotline on **0800 789 321**. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

The DSL may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and the Channel programme where necessary. The DSL will inform the child they will be speaking with their parents and will seek the parent's consent when referring to the Channel programme unless this places the child at more risk of harm.

6.16 Staff and governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link.

The Prevent leads in Kingston and Richmond are
Kingston:
Stephanie Royston-Mitchell, Community Safety and Resilience Principal stephanie.royston-mitchell@kingston.gov.uk

Richmond and Wandsworth:
Naheem Bashir, Vulnerabilities Manager Naheem.Bashir@richmondandwandsworth.gov.uk

6.17 How pupils can report concerns

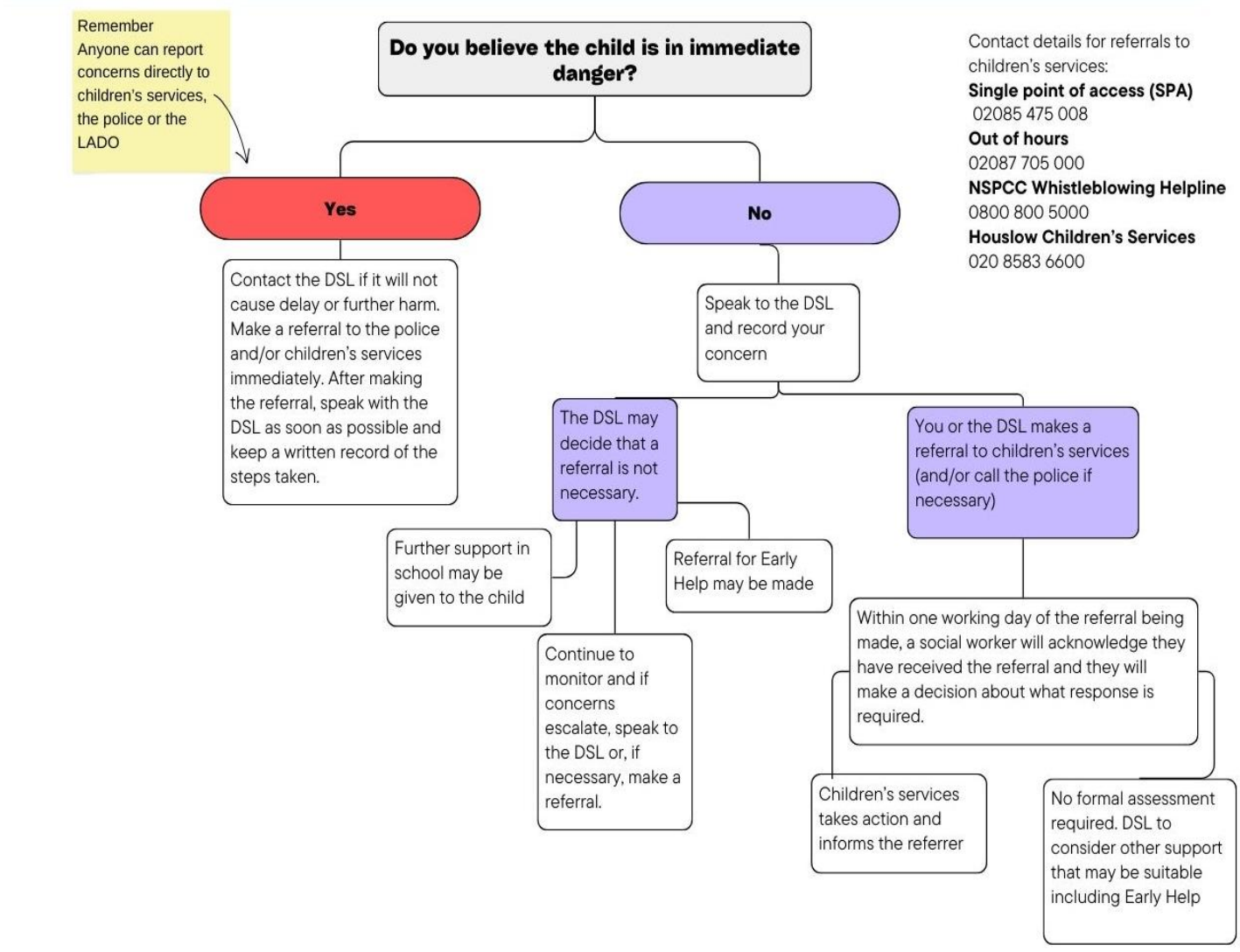
In our school, it is essential that pupils can tell us how they are feeling and know we will take seriously anything they share with us. We aim to create an environment full of 'reachable moments' which encourages pupils to feel safe enough to open up if they are concerned about something. Pupils can confidently report any worries they have about their lives, both in and out of school, by

- speaking to an adult they trust
- putting a written or an anonymous disclosure in worry box/worry monsters
- Speaking to Peer Wellbeing Mentors

There are safeguarding posters which are visible around the school, letting pupils know how to report concerns. There are also worry boxes outside the DSL's offices where children can post notes if they wish to talk. The DSL is visible and regularly delivers assemblies on her open-door approach. In PSHE lessons, children are taught about adults they can talk to with concerns and the PANTS rule is revised each lesson.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's voice of the child briefing. When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

Flowchart: what to do if you have concerns about a child



The SPA number in the flow chart is for Richmond SPA

The pupil's circumstances will be continuously monitored. A re-referral will be made if the pupil's circumstances worsen or if no improvement is made. If there is a disagreement about the outcome of the referral, the local escalation procedures apply.

7. Confidentiality

Kew College Prep takes its responsibility to protect and look after the data (information) we hold about pupils and our families seriously. The Data Protection Act (DPA) 2018 and UK General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information.. DfE guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

We will share information in a timely manner to keep children safe, which will include sharing information with agencies and professionals in line with the current Working Together to Safeguard Children guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and Head will only share information about a child to members of staff and professionals on a need-to-know basis.

All staff are aware that they cannot make a promise to a pupil to keep secrets that might impact on the pupil's safety or wellbeing. Instead, staff should tell the pupil that they may need to pass information on to others who can help and protect them.

7.1 Notifying parents or carers

At Kew College Prep, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause

further harm, we will seek advice from children's services about how and when parents or carers should be updated.

It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

8. Record Keeping

Each pupil has a secure section on Schoolbase, our school's Management Information System, where all safeguarding concerns and referrals are stored. They are also stored in a secure, restricted access folder on our school drive. The DSL is responsible for keeping these files up to date. Safeguarding files will be stored securely, and access will only be given to those who need it.

When pupils leave Kew College Prep, the school will make sure that their safeguarding file is transferred to the new education setting within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main pupil file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the pupil transferring so support can be put in place ready for when the pupil starts.

After leaving the school, all pupil records will be archived until the pupil's 26th birthday, and then retention will be reviewed. If a referral has been made/social care has been involved, then the record may be kept indefinitely. When the records are no longer retained, they will be securely disposed of. When a child starts our school, we will make sure key staff are aware of the contents of the safeguarding file as soon as possible.

If Kew College Prep is the last school that the pupil attends, their safeguarding file will be securely stored by the school until their 26th birthday is reached, and then retention will be reviewed. If a referral has been made/social care has been involved, then the record may be kept indefinitely., when it will be securely disposed.

9. Concerns or allegations about adults in our school

If you have a LLC, or an allegation is made, about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the Head or DSL as soon as practically possible. This includes any concerns in school, out of school, online and/or offline.

If the LLC or allegation is about the Head, contact the Chair of Governors, chairofgovernors@kewcollegeprep.com

If you are unable to report to the Head or Chair of Governors either because they are not available or because you believe that there is a conflict of interest, share your concerns with the LADO, whose details are at the start of this policy.

Appendix 2 sets out what steps the Head or Chair of Governors will then follow if appropriate.

9.1 Non-Recent Child Abuse

Non-recent (or historical) abuse refers to abuse experienced by an individual under the age of 18, which is disclosed in adulthood. Survivors may carry feelings of guilt or self-blame, but it is important to understand that abuse is never the victim's fault.

We encourage anyone with concerns about non-recent abuse related to Kew College Prep to contact the DSL confidentially.

10. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing, and all staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the SLT and will be taken seriously. Kew College Prep has a separate ***Whistleblowing Policy***, which lists the procedures for raising concerns. It is available on request.

Where staff feel unable to raise a concern with our SLT or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call: 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

11. Online safety and the use of smart devices

This section summarises Kew College Prep's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our Online Safety Policy. Further policies reference the online approach including the Staff Code of Conduct, Online Safety and Anti-cyber bullying policy. These policies are available on the school website.

Kew College Prep understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to:

- have in place processes about online safety that protect our children and staff, including how we identify, intervene in and escalate any online concerns where appropriate

- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

We fulfil our aims by:

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices using the DfE's 'Plan technology for your school' service to assess and improve systems against filtering and monitoring standards.
- educating children to learn how to keep themselves safe when online (using the government's Teaching online safety in schools guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- ensuring children are aware of the online safety risks posed by misinformation, disinformation, and conspiracy theories, often presented in convincing ways through AI generated material.
- engaging with parents and carers about what online safety looks like
- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement, which covers how they should use the school's IT systems and their mobile and smart technology
- making parents, carers, pupils and staff aware that staff can search an electronic device they have confiscated, as explained in Searching, Screening and Confiscation - GOV.UK

In addition, see our filtering and monitoring section below.
Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our Online Safety Policy, procedures and systems.

11.1 The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non consensual sharing

of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

11.2 Mobile phones and smart technology (including smart watches)

Kew College Prep operates a mobile-phone-free environment for pupils during the school day, except where specific authorised arrangements are in place.

We know that, because many children have unlimited and unrestricted access to the internet via mobile phone networks, some children, while at school, can harm others or be harmed by others online. This includes sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is:

- No child should have a mobile phone on their person or in their bag during school hours.
- If a pupil is found to have one, it is removed, held in the office and handed to the parent, guardian or carer the end of the day.
- With parental consent, pupils in Year 6 are permitted to bring their mobiles phones to School in preparation for moving onto secondary School. The mobile phones are handed into a member of school staff each morning and returned at the end of the day. The phones must be switched off when at School. Prior to this, the children are reminded about the safe and appropriate use of their mobile phones, including sexting, through PHSEE, ICT and Assemblies. With their parents, they are required to sign an 'Acceptable Use' contract prior to bringing their phone to school.
- The use of personal devices, such as mobile phones, iPads, tablets or laptops, by pupils in not allowed in School.
- In specific circumstances, related to special education needs, a personal laptop may be used. This will have been approved by the SENDCo, form tutor and IT lead.

For staff, designated 'mobile' areas are defined. These include the staff room, or in the school offices or empty classrooms when no children are present. 'Mobile free' areas are those which are considered to be the most vulnerable and sensitive.

- Changing areas including cloakrooms
- Toilets
- Medical room
- All EYFS areas or areas where EYFS children are present

A zero-tolerance policy is in place with regards to the use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities by any individual in these areas (listed above) or in any areas where there are EYFS children. This will include when they are in specialist

teaching rooms and at clubs. Where EYFS children are being taught, mobile phones MUST be locked away. Staff should refer to the Staff Code of Conduct with regards to mobile phone use.

11.3 Media recordings, audio, image and video (including digital files)

When we make media recordings of pupils, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the pupil is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our Staff Code of Conduct and Online Safety Policy, which cover our school's expectations for staff making media recordings.

11.4 Filtering and monitoring

To limit pupil's exposure to these categories of risk from Kew College Prep's IT systems, we have strong and effective filtering and monitoring systems, following the government's Meeting digital and technology standards in schools and colleges guidance.

We make sure that:

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue using the DfE's 'Plan technology for your school' service to assess and improve systems against filtering and monitoring standards
- our Board of Governors review the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe
- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact on teaching and learning
- filtering works across all devices including mobile phones and smart technology

11.4A Generative Artificial Intelligence (Gen AI)

Generative Artificial Intelligence (Gen AI) refers to artificial intelligence which creates new content such as text, images, audio or code. Kew College Prep recognises that Gen AI can provide educational benefits but may also introduce safeguarding risks if used inappropriately.

The school follows Department for Education guidance on the safe use of artificial intelligence within education. Staff are aware of safeguarding risks associated with Gen AI, including misinformation, disinformation, deepfakes, online exploitation, inappropriate content generation and cyber security risks.

Any safeguarding concerns arising from the use of artificial intelligence will be managed in accordance with this policy and the Online Safety Policy.

11.5 Remote education

When our pupils are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- what their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren
- the importance of children being safe online and offer advice on how to do so
- what systems our school uses to filter and monitor online use

11.6 Information security and access systems

We have procedures in place to protect our IT systems, staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We follow the government's Cyber security standards guidance. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

We use a visitor management access system (InVentry), where all staff and visitors register digitally on entering and leaving the school. All visitors are given a coloured lanyard and ID badge, which allows us to identify and differentiate between adults on-site, so that our premises is secure and that visitors are appropriately supervised or escorted, where necessary.

12. Children potentially at greater risk of harm

At Kew College Prep, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of those groups of children this applies to:

12.1 Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse and/or neglect and/or complex family circumstances. Kew College Prep recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

Children's services share with us which pupils have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our pupils who have a social worker, such as art therapy, use of calm-down-kits and pastoral support groups with DSL.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

12.2 Children looked after and previously looked after

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Kew College Prep will aim to ensure that staff have the necessary skills and knowledge to keep children looked after, and previously looked after, safe. All staff have the skills and knowledge to keep these children safe. Appropriate staff have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. Kew College Prep has a Designated Teacher for children looked after and a Designated Governor for children looked.

The statutory guidance Designated teacher for looked-after and previously looked after children contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

12.2A Young Carers

Kew College Prep recognises that young carers may face additional challenges affecting attendance, learning, wellbeing and educational outcomes. We seek to identify young carers early and ensure that appropriate support is in place.

The Designated Teacher for Young Carers works alongside pastoral staff, the DSL and external agencies where appropriate to support young carers and reduce barriers to learning and wellbeing.

12.3 Children with special educational needs, disabilities and health issues

Our SEND Co-ordinator and DSL work closely together to safeguard and support pupils who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach pupils to keep themselves and others safe, is adapted to meet the needs of pupils with SEND on a child-by-child basis, responsive their individual level of learning.

Kew College Prep is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and the communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools, or the consequences of doing so.

We offer additional pastoral support for these pupils, which includes:

- Art therapy
- Pastoral support groups
- Learning enrichment groups focussing on behaviour
- Social skills groups

12.3A Children Who Are Gender Questioning

This section applies where a child or their parent requests that the school make changes or put support in place to facilitate the child presenting as the opposite biological sex (sometimes referred to as social transition).

The school will balance the impact of agreeing to a request against the impact of refusing the request, taking account of all relevant factors and the best interests of the child and other pupils.

The school will work with the child and, unless doing so would place the child at risk of harm, their parents or carers. Consideration may also be given to relevant professional or clinical advice.

The DSL will be involved in decision-making and the rationale for any decision will be recorded appropriately.

The school will provide support to children who are gender questioning and signpost families to appropriate services where appropriate.

12.4 Children in the Early Years Foundation Stage

Children in the Early Years are recognised as being particularly vulnerable due to their age, stage of development and reliance on adults for care and supervision. The school meets the safeguarding and welfare requirements of the updated EYFS Framework 2026 through this whole-

school Safeguarding and Child Protection Policy, supported by the EYFS Policy 2026, which outlines the specific operational arrangements for the Early Years. The DSL and Deputy DSL (Head of Early Years) oversee all safeguarding and child protection matters relating to the EYFS.

Safeguarding and Welfare Requirements

The revised framework strengthens requirements for safer recruitment, suitability checks and the maintenance of appropriate records for individuals working within the EYFS. These expectations are met through the school's Recruitment and Selection Policy Including Safer Recruitment and form part of the school's wider safeguarding procedures.

Where volunteers work within the EYFS, including where they will be supervised, they will not be permitted to begin working in the EYFS provision until the school has received the required enhanced DBS certificate, including children's barred list information. Volunteers awaiting the required clearance will not undertake duties within the EYFS.

New employees will not commence employment within the EYFS until the school has received and reviewed the criminal-record and suitability checks required by the current EYFS statutory framework, including the appropriate enhanced DBS certificate and children's barred list information

All staff and other relevant adults working within the EYFS must inform the Head immediately of any change in their circumstances or other information that may affect their suitability to work with children. Staff are informed of the matters they are required to disclose through induction, the Staff Code of Conduct and the school's safer-recruitment and employment procedures. Any information disclosed will be considered in accordance with the current EYFS statutory framework and relevant safeguarding guidance.

Supervision, Care and Safe Practice

The EYFS 2026 framework sets out clearer expectations regarding safe-eating practices, allergy management, choking prevention and appropriate adult supervision during mealtimes. These expectations are implemented through the school's health, medical and EYFS procedures.
It also reinforces the need to uphold children's privacy and dignity during intimate care, supported through the school's Intimate Care Policy and procedures within the EYFS Policy 2026.

The school has regard to the Department for Education's guidance on screen use in early years settings. Screen use within the EYFS is limited, purposeful, age-appropriate and linked to a clear learning or development aim. It does not routinely replace play, physical activity, outdoor learning, conversation, reading or high-quality interaction with adults and other children. Digital content is

checked in advance and children's screen use is appropriately supervised. Screen-based assistive technology may be used where it supports an individual child's SEND, communication or accessibility needs.

Although children do not routinely sleep within the school's EYFS provision, where an EYFS child requires sleep or rest during the school day, staff will follow the safer-sleep requirements in the current EYFS statutory framework and the school's agreed EYFS procedures.

Attendance, Absence and Missing Children

Strengthened requirements for monitoring, recording and responding to unexplained or prolonged absence apply to all children in the EYFS. EYFS staff follow up absences promptly, consider patterns of absence and, where appropriate, take safeguarding action in line with the school's Attendance and Registration Policy, Missing Child Procedure and safeguarding procedures.

Training, Ratios and Staff Competence

All Early Years staff receive annual safeguarding training in accordance with Annex C of the EYFS Framework 2026. Trainees, students, apprentices and volunteers may only be included within statutory ratios where they hold suitable paediatric first aid. The DSL and Deputy DSL ensure that these requirements are met and that training is embedded in day-to-day practice.

Whistleblowing and Raising Concerns

The updated framework also reinforces the need for clear systems enabling staff to raise concerns about unsafe or inappropriate practice. These expectations are met through the school's Whistleblowing Policy and apply to all staff working with Early Years pupils**.**

13. Identified areas of particular risk for our school

The site of Kew College Prep has two distinct buildings and pupils must cross public land when transferring between the two sites. This is approximately 10 metres and children are always accompanied by a school adult. Access gates are locked whilst pupils are on site and rear access gates automatically lock upon closure and there is CCTV present.

The school site sits near to a busy road, pupils are not allowed to leave the school premises without being accompanied by an adult and they walk next to the buildings with a member of staff on the other side during school hours.

Kew College Prep maintains security arrangements and response plans to protect pupils, staff, volunteers and visitors from external threats. Security procedures and critical incident responses are reviewed regularly. Appropriate drills are undertaken to ensure staff are prepared to respond effectively in the event of a significant incident.

The school will seek and act upon feedback from pupils, staff and parents regarding areas of the site where individuals may feel unsafe.

Where concerns arise regarding risks within the local community or surrounding area, the school will work with relevant agencies and safeguarding partners to support pupil safety.

14. Lettings and off-site arrangements

14.1 Lettings

The school does not currently let its site.

14.2 Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and procedures apply.

When our pupils attend an alternative provision provider, we obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform on our own staff. The alternative provision provider must also commit to informing the school of any changes that could put pupils at risk, such as staffing changes, so that the school can ensure updated safeguarding checks are completed. We follow the statutory guidance for alternative provision, KCSIE 2026 and Achieving for Children's alternative provision policy. We provide additional Kew College Prep specific safeguarding training as part of a safeguarding induction for any staff working with our pupils, long term.

When our pupils attend off-site activities, we ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

15. Training

15.1 Designated safeguarding lead

The DSL will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. Minimally, the DSL will:

- attend the level 3 multi-agency local safeguarding partnership training within 12 weeks of starting this role and refresh this every two years

- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the Kingston and Richmond safeguarding children partnership by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend harmful sexual behaviour and Prevent awareness training
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at Kew College Prep
- Has regular supervision meetings with an external social worker for objective advice

15.2 Governors

All governors complete at least level 2 safeguarding training and must confirm they have read the latest version of KCSIE. The Governor for Safeguarding is level 3 trained.

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training is regularly updated. Further,

- The Board of Governors make sure the DSL has the time and resources to attend training.
- The Chair of Governors receives training about managing allegations against the Head to assist them in the eventuality that an allegation is made.
- The Board of Governors ensures that the DSL covers online safety in staff safeguarding training.
- Senior members of the Board make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The Governor for Safeguarding will make sure that staff and governors attend safeguarding training at induction and regularly after that. The Governor for Safeguarding will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

The Governor for Safeguarding will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Kew College Prep has a separate Recruitment and Selection Policy including Safer Recruitment, which explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

15.3 All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy.

New staff receive safeguarding and child protection training (including online safety) at induction. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annually, safeguarding updates with/from the DSL (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe. All staff must confirm they have read the latest version of KCSIE annually. All Kew College Prep staff receive Ihasco or external safeguarding training on a two-yearly cycle.

EYFS Framework 2026:
Staff working within the Early Years receive safeguarding training appropriate to the age of the children in their care, in accordance with Annex C of the EYFS Framework 2026. The DSL and Deputy DSL (Head of Early Years) provide ongoing support, advice and guidance to ensure safeguarding procedures are implemented effectively in practice.

Our training aims to ensure that staff:

- can spot the signs of possible abuse, neglect and exploitation
- know the school's safeguarding procedures and their role in carrying them out
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this information confidentially
- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas
- understand what cyber security the school has in place to keep pupils and staff safe when online at school and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children

15.4 Supply staff, contractors, volunteers and peripatetic staff

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as building contractors) are aware of this policy, our school's safeguarding procedures, have had appropriate background checks and have received appropriate safeguarding training.

All parent volunteers must attend face-to-face training with the DSL. All other staff are sent safeguarding induction information before coming on site.

All peripatetic staff must provide evidence of level 2 training, which may be completed through ihasco, and must confirm they have read the latest version of KCSIE.

15.5 Head

In addition to the all-staff training, the Head will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

15.6 The designated teacher for children who are looked after (CLA)

We follow the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's Virtual School, accessing their training and forums to stay up to date.

16. Teaching and Learning

At Kew College Prep, we aim to prevent our pupils from coming to any harm. We recognise how important it is that we teach and role-model to pupils how to keep themselves and others safe. Our curriculum meets the needs of all pupils, such as pupils with SEND and pupils who have been abused.

Safeguarding underpins our school ethos and curriculum. Our DSL has good visibility around school and there are posters around school to alert children as to who the safeguarding team are. There is an open culture to discuss concerns pupils may have or to make a disclosure. We hold regular pupil voice interviews to ensure children express that they understand how to access the DSL team.

Through our PSHE and RSE curriculum we teach children: how to stay safe at home, at school and in the local community, how to stay safe online and while using the internet. Pupils are taught to critically evaluate online information, understand the risks of misinformation, disinformation, conspiracy theories, and AI-generated content, and develop resilience in online interactions. Teaching is age-appropriate and builds progressively, ensuring children are aware of the risks of emerging technologies such as AI. We have an external provider who supports teaching about

online safety who comes in to speak with the children. See our Online Safety Policy for further information. We teach children to understand the risks associated with drugs, alcohol, and tobacco and understand that inappropriate contact or touch is unacceptable, respect personal boundaries (e.g. the NSPCC PANTS rule), foster the confidence to advocate for themselves and others through our science and PSHE curriculum.

The curriculum also covers:

- Discussions about personal safety and keeping safe, reinforcing the message that any kind of violence is unacceptable and letting children know it is ok to talk about their own problems and signpost sources of help
- Older children have lessons on travelling to and from school safely, including planning safe routes, travelling on public transport and cycle training. Younger pupils have road safety and scooter training.
- The teaching of personal values and morality in Religious Education lessons, to develop appropriate attitudes in our pupils and make them aware of the impact of their decisions on others and how to safeguard themselves.
- We have year 6 Wellbeing Mentors who apply for the role and are selected by the Head of Pastoral Care. They contribute to assembles around mental health and are a point of contact for their peers to talk about issues or concerns. They communicate and meet regularly with the Head of Pastoral Care for further training and support.
- Art Buddies: younger pupils are paired up with older children and guided through art sessions with our art teacher. The aim is to build links across the school and give pupils an opportunity to explore feelings and emotions.
- Participation in national engagement weeks such as Anti-Bullying Week, Safer Internet Day, Mental Health Awareness Week and Road Safety Week.
- In weekly PSHE and RE lessons, assemblies and Collective Reflection, pupils are taught the importance of kindness, tolerance and respect, to respect diversity within their communities, understand what gender stereotyping involves and how it affects others, challenge stereotyping, prejudice and inequality, to respect and uphold British values and human rights, understand the principles of democracy and be respect and be inclusive of all, and being aware of protected characteristics.

17. Linked policies

This policy is one of a range of documents that set out our responsibilities and how we should carry them out. Other relevant policies include:

Anti-Bullying Policy, Anti-Cyber Bullying Policy, CCTV Policy, Good Behaviour Discipline & Sanctions including Exclusions Policy and Reasonable Force , Special Educational Needs including Children with Learning Difficulties and/or Disabilities Policy, Staff Code of Conduct, PSHE & Citizenship, Relationships and Sex Education Policy, Privacy Notice, Procedure for managing allegations against staff, Low-level Concerns Policy, Recruitment and Selection Policy including

Safer Recruitment, Online Safety Policy, Taking, Storing & Using Images of Pupils Policy, Whistleblowing Policy & Procedures

Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSIE guidance.

Abuse is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- communicating to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another, such as in situations of domestic abuse
- serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing, causing, inciting 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
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect 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. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

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

We use the following guidance to help identify and address cases of neglect.
Handling Cases of Affluent Neglect in Schools
Local partnership guidance

Indicators of abuse

The following list, provided by the NSPCC, covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality:
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- patterns of repeated lateness or absence

It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.

Specific safeguarding concerns

This section is based on Annex B of KCSIE 2026, which provides additional information about specific safeguarding concerns that staff should be aware of. All concerns described in this section should be managed in accordance with the procedures outlined in Section 6 of this policy, unless stated otherwise.

Children absent from education

All staff will be aware that children missing from education or absent persistently, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at KCP to support us in identifying abuse and acting early. Our staff are aware of our school's unauthorised absence procedures and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. We make sure we have more than one emergency contact number for each pupil, which supports the school's procedure for addressing children missing and absent from education. We work in partnership with AfC when patterns of absence give rise to concern, including notifying them when a pupil leaves our school without a new school being named.

Our attendance policy and procedures are set out in a separate document, which can be found here. The school follows the government's Working together to improve school attendance guidance.

Useful links:
Local partnership guidance
Children Missing Education statutory government guidance

Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Kew College Prep will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information

with the contextual safeguarding team for AfC, contextualsafeguarding.exploitation@achievingforchildren.org.uk. If there is a specific concern about a child, we will consult with the relevant children's services.

Useful links:
Local partnership guidance
Achieving for Children's Risk Outside the Home page
Tackling Child Exploitation multi-agency Practice Principles

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as CCE (including county lines) and CSE. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in 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. Our staff are aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

See the Sharing nudes and semi-nudes section below for details about 'sextortion'.

Kew College Prep follows the London Child Protection Procedures regarding sexual exploitation. Further information on signs of a child's involvement in sexual exploitation is available in Home Office's Child sexual exploitation: definition and guide for practitioners.

Child criminal exploitation (CCE)

At Kew College Prep, we recognise children involved in CCE are victims, despite their engagement in crime. A child may still have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of CCE too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

CCE can include children being forced and/or manipulated:

- to work in cannabis factories
- into moving drugs or money across the country (county lines)
- to shoplift or pickpocket
- to threaten serious violence to others
- into committing vehicle crime

Serious violence

Staff at Kew College Prep are aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- Unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation)

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:

Preventing youth violence and gang involvement government guidance
Criminal exploitation of children and vulnerable adults: county lines government guidance

School-related weapons incidents

Kew College Prep follows the AfC School Related Weapons or Potential Weapons Incidents Protocol. We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search pupils without consent for a number of 'prohibited items', including weapons covered in the government's Searching, screening and confiscation guidance.

Kew College Prep recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Kew College Prep provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

Children who run away or go missing from education, home or care

Kew College Prep recognises that children who run away, go missing or are absent from their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, Kew College Prep will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school site for the interview to take place. We will follow the Kingston and Richmond Safeguarding Children Partnership's Missing children procedure when required.

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. Kew College Prep recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are trained to recognise the signs of a child who may be experiencing a mental health problem. Kew College Prep aims to promote positive mental health for all staff and pupils. To do so, we take into account the government's Mental health and behaviour in schools guidance.
Our mental health lead is the Head of Pastoral Care.
At Kew College Prep we have Wellbeing Mentors, posters located around school for children to know who to speak to if they have concerns, Art Therapy, Wellbeing Days and Calm-Down Kits in each classroom. The Head of Pastoral Care is also a trained Mental Health First Aider.

Useful links:
Local partnership guidance
Mind
NSPCC: Child mental health

Domestic abuse

Domestic abuse can include a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that 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).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

The school recognises that children who see, hear or experience the effects of domestic abuse are victims in their own right and may require safeguarding and pastoral support.

Kew College Prep participates in Operation Encompass, a national information-sharing partnership between police and schools. Through this initiative, the school receives timely information from the police following a domestic abuse incident where a child attending the school has been present, exposed to, or affected by the incident. This enables the school to provide immediate and appropriate support to children and families who may be experiencing the effects of domestic abuse.

The DSL and Deputy DSLs are the school's trained Key Adults for Operation Encompass and ensure that information received is handled confidentially and used to support the child's welfare, safety and educational outcomes.

Homelessness

Kew College Prep recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- 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
- upskirting and initiation/hazing type violence and rituals

- Child-on-child abuse may include discriminatory behaviours, including racism, faith-targeted abuse and other prejudice-based incidents.

Older pupils may use any of these types of child-on-child abuse to 'recruit' younger pupils into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to recruit other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Kew College Prep does not tolerate child-on-child abuse. We know that even when there are no reported cases of child-on-child abuse, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For pupils to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The Good Behaviour and Discipline Policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when pupils show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach pupils how to act and to treat other people, including when they are online.
- We have effective systems in place for pupils to report child-on-child incidents.

Discrimination

Kew College Prep fosters inclusivity and belonging, creating opportunities to celebrate diversity through our curriculum and wider school activities. We recognise that discrimination can cause trauma and negatively impact a child's wellbeing, sense of belonging and safety. Taking timely action helps prevent concerns from escalating into bullying and promotes an inclusive and supportive school environment.

Some pupils may face greater risks of harm or bullying from issues such as sexual violence, homophobic, biphobic, transphobic, faith-based or race-based discrimination. Children may also be targeted because of a perceived characteristic. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for all.

Kew College Prep recognises prejudice-based harm, including racism, faith-targeted abuse and other forms of discrimination, as harm in its own right and will respond to such incidents through safeguarding procedures where appropriate. Racism and faith-targeted abuse can significantly impact a child's wellbeing, welfare, sense of belonging and safety.

We aim to provide a safe and open environment where pupils feel able to share concerns. Discriminatory incidents will be addressed in line with this policy and the school's behaviour procedures and may require referral to children's services and/or the police where appropriate. Suitable support and follow-up will be offered to pupils who experience discrimination.

The school will challenge discriminatory attitudes and behaviours, making it clear that such behaviour is unacceptable. Appropriate action will be taken to educate those responsible, promote understanding and reduce the likelihood of recurrence.

Child-on-child sexual violence and sexual harassment

Our school is aware of Ofsted's Review of sexual abuse in schools and colleges. The review was carried out as a result of the large number of testimonies shared on the Everyone's Invited website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists on a continuum and may overlap. They are never acceptable and the school will not tolerate them. No reports does not mean it is not happening here at Kew College Prep.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND
- pupils who are LGBT or who are perceived to be LGBT by their peers

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is likely to negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding.

Kew College Prep follows Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

Harmful sexual behaviours (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Kew College Prep recognises that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputies:

- have a good understanding of HSB
- assist in planning the curriculum aimed at preventing HSB
- train staff to spot and report inappropriate behaviour to prevent an escalation
- incorporate our approach to sexual violence and sexual harassment into the whole school approach to safeguarding

Kew College Prep curriculum addresses these issues via the following topics according to the age and stage of development of our pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:
Local partnership guidance
NSPCC Harmful Sexual Behaviours
Stop it Now

Upskirting

Kew College Prep ensures that all staff and pupils are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a

colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

Kew College Prep will judge each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern will always be the welfare and protection of the children involved. while sharing nudes and semi-nudes of them or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily. Learning around this topic is covered in our PSHE, RSE and computing curriculum and external visitors discuss this too.

So-called 'honour'-based abuse, including FGM and forced marriage

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

FGM

FGM means 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. The DSL makes sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

Section 6 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.

- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away – from home (NSPCC)

Signs FGM might have taken place:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school
- reluctance to go to the doctors or have routine medical examinations
- asking for help – though they might not be explicit about the problem because they are scared or embarrassed (NSPCC)

Useful information:
Female Genital Mutilation Statutory Guidance
Local partnership guidance

Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.
An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:
Freedom charity
Handling cases of forced marriage guidance
National FGM Centre

Modern slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

- the sex industry, including brothels

- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:
Modern slavery: how to identify and support victims

Private fostering

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

Kew College Prep is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful links:
Looking after someone else's child
Local partnership guidance

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously. **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is 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 of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

To prevent children from being radicalised into terrorism, we make sure::

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Pupils are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- The DSL is the Prevent Lead and makes sure that staff have appropriate Prevent training and induction

We perform a risk assessment which assesses how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.The Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have concerns that a pupil may be at risk of radicalisation or involvement in terrorism, go to section 6.

Useful links:
Local partnership guidance
Protecting children from radicalisation: the prevent duty

Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

If a member of staff suspects a case of child abuse linked to faith or belief, they follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

Useful links:
Metropolitan Police advice
Short Youtube introduction video

Fabricated or induced illnesses

Staff at Kew College Prep are alert to the issues surrounding fabricated or induced illnesses. Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting pupils with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:
The Royal College of Paediatrics and Child Health (RCPCH) guidance

Appendix 2: Allegations against staff (including low-level concerns) policy

As part of Kew College Prep's whole School approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. Adults working at our School include all teaching and non-teaching staff, including supply teachers, volunteers, and contractors. Despite all efforts to recruit safely, there may be occasions when allegations of abuse against children are reported to have been committed by staff, supply staff, practitioners and/or volunteers, who work with pupils in our school.

1: Allegations that may meet the harms threshold

These procedures should be used in respect of all cases in which it is alleged that a current teacher or member of staff (including supply teachers, agency workers, volunteers and contractors) in the school has:

- possibly committed a criminal offence against or related to a child; or
- behaved in a way that has harmed a child, or may have harmed a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- behaved in such a way that expected behaviour set out in the Staff Code of Conduct is alleged to have raised LLCs that do not meet the harms test. In this case, the concerns will be managed according to the process stipulated in this policy.

If we're in any doubt as to whether a concern meets the harms threshold, we will consult our LADO.

Allegations should be reported straight away to the **Head or DSL.** Where conflict of interest in reporting the matter to the Head exists, it should be reported to LADO directly. A 'case manager' will lead any investigation. This will be the Head, or the chair of governors where the Head is the subject of the allegation. The case manager will be identified at the earliest opportunity. In case of serious harm, the police should be informed from the outset.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Allegations against a teacher who is no longer teaching at the school should be referred to the police.

In every situation, immediate contact must be made with the LADO to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement with the police. When using an agency, the School will inform the agency of its process of managing allegations. The School will not carry out its own investigation without prior consultation with the LADO or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO should initially be held informally and without naming the School or individual concerned. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Due consideration will be given to the views of the LADO when making a decision about suspension of a staff member.

1.1 Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

1.2 Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

1.3 Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- The School will act to manage and minimise the stress inherent in the allegations and disciplinary process. They will be advised to contact their trade union representative, if they have one), or a colleague for support. Staff may be directed to counselling services such as Education Support.
- The School will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate. Particular care will be taken when an employee is suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

For EYFS:

Where the statutory notification requirement applies, the school will inform Ofsted of any allegation of harm or abuse by any person living, working or looking after children at the premises, whether the alleged harm or abuse occurred on the premises or elsewhere. The school will also notify Ofsted of the action taken in response. Notification will be made as soon as reasonably practicable and always within 14 days of the allegation being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

1.4 Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Board of Governors will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

1.5 Timescales

It is in everyone's interest to resolve cases as quickly as possible with a fair and thorough investigation. We will endeavour to comply with the following timescales, where reasonably practicable:

- Any case where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Where the initial consideration decides that the allegation does not involve a possible criminal offence the school will conduct an internal investigation. In such cases, if the nature of the allegation does not require formal disciplinary action, the school will aim to instigate appropriate action within three working days. If a disciplinary hearing is required and there is no need for further investigation, the School's disciplinary procedures will be followed.

1.6 Resignations and 'Settlement Agreements'

The fact that a person tenders his or her resignation, or ceases to provide their services, will not prevent an allegation being followed up in accordance with these procedures. It may not be

possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but a conclusion will be reached and recorded wherever possible. So called 'settlement agreements', by which a person agrees to resign if the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, will not be used in these cases. In any event, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the Disclosure and Barring Services (DBS) (see below) where circumstances require.

1.7 Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

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

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Details of allegations that are found to have been malicious should be removed immediately from the safeguarding records. Cases in which an allegation was proven to be false, unsubstantiated, or malicious should not be included in employer references. A history of repeated concerns or allegations which have been found to be false, unsubstantiated, malicious etc. should also not be included in any reference.

1.8 Disclosures, Allegations and GDPR

GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed.

Due weight should be given to the views of the LADO, KCSIE and Working Together when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

1.9 Record keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

It will provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. Employment Practices Code and supplementary guidance provides some practical advice on employment retention.

1.10 Referral to DBS and the DfE Teaching Regulation Agency

The School is committed to promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is they have caused harm or posed a risk of harm to a child. Failure to make such a report constitutes an offence.

Ceasing to use a person's services includes; dismissal, non-renewal of a fixed term contract, no longer engaging / refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation and voluntary withdrawal from supply teaching; contract working, a course of initial teacher training, or volunteering. Settlement agreements cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The School Governors recognise that they have a legal duty to respond to requests from the DBS for information that they hold, but do not have to find it from other sources. The School Governors will disclose to inspectors all instances of action in relation to safeguarding concerns. The referral should be made by the Head.

Should a teacher be dismissed (or would have been dismissed had he or she not resigned) a referral will be also made to the DfE's Teaching Regulation Agency if a prohibition order may be appropriate. The reasons that such an order would be considered are, "unacceptable professional conduct", "conduct that may bring a profession into disrepute" or a conviction at any time, for a relevant offence".

1.11 Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

1.12 Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Contact details for the LADO are set out in Section 3, Key Personnel. For full details of the procedure that follows a referral see DfE Guidance; *KCSIE.*

2 Low Level Concerns (concerns that do not meet the harm threshold)

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

When in doubt that the allegation may not meet the threshold for LLCs the LADO may be consulted for advice.

2.1 Definition of low-level concerns

A Low-Level Concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the sections of our Staff Code of Conduct which relate to acceptable behaviour around children, including inappropriate conduct outside of work
- **and** does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

Such behaviour can exist on a wide spectrum and therefore any allegation of a LLC will be investigated thoroughly and consultation with external agencies may be sought to determine whether or not the alleged concern falls within the threshold of an LLC.

2.2 Preventing LLCs

Kew College Prep is committed to ensuring that all those who work with children at our School understand and abide by expected behaviour towards children. At Kew College Prep, we train our staff to be clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour in themselves and others. Training is provided regularly to help them identify LLCs within the context of safeguarding.

All staff should be aware of safer working practice and should be familiar with the guidance contained in the Staff Guide to School Procedures, Staff Code of Conduct and the 'Guidance for safer working practice for adults who work with children and young people in education settings'

Guidance for safer working practice for those working with children and young people in education settings February 2022

Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction. All staff should be aware of Kew College Prep's Good Behaviour and Discipline Policy. All school staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults.

2.3 Sharing LLCs

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns **with the DSL (nominated person) or the Head** so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Staff may choose to speak directly with the Head or to speak with the DSL.

2.4 Responding to LLCs

In all cases of sharing concerns, the Head and DSL will share and collect information where necessary. If the concern is raised via a third party, the Head/ DSL will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

Concerns will be always taken seriously and investigated thoroughly as necessary.

The Head will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Code of Conduct. The Head will be the ultimate decision-maker in respect of all LLCs, though they may wish to collaborate with the DSL.

2.5 Recording Low-Level Concerns

All LLCs will be recorded in writing by the Head. The record will include details of the concern, the context in which the concern arose, any action taken and the rationale for decisions and action takes. The name of the individual sharing their concerns should also be noted, however, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be held securely and reviewed at least termly.

KCSIE requires schools in England to keep allegations on staff personnel files in line with the School's Record Retention Schedule. If an allegation was found to be malicious or false, for its own protection, the employer may need to keep a limited record that an allegation was received and investigated.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

The Head will inform the Governing Body about the implementation of the LLC Policy and any evidence as to its effectiveness under the category of 'Safeguarding' in her termly reports.

2.6 References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.