



## KEW COLLEGE PREP

### Safeguarding and Child Protection Policy

This policy applies to the whole school including the EYFS

This policy is published on the Kew College Prep website and is available to parents from the School Office upon request. This policy is updated annually and will be updated whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

The policy is written with due regard to the following:

***Keeping Children Safe in Education (KCSIE) (Sept 2023) including Annex B***

***Working Together to Safeguard Children (Sept 2018)***

***Prevent Duty Guidance: revised for England and Wales (April 2023) (Prevent)***

***The Prevent Duty: Departmental Advice for schools and childminders (June 2015)***

***Kingston and Richmond Safeguarding Children Partnership Policy and Procedures***

***What to do if you are worried about a child being abused–Advice for Practitioners Mar 2015***

***ISI Handbook for the Inspection of Schools – Commentary on the Regulatory Requirements***

***(Sept 2023)***

***Independent Schools Standards Regulations (ISSRs) - Guidance for Independent Schools***

***Disqualification under the Childcare Act 2006 (Sept 2018)***

***The Education Act 2002 S. 175***

***The Children Act 2004***

***The Children and Learning Act 2009***

***The use of social media for on-line radicalisation (July 2015)***

***The Children Plan and Every Child Matters (ECM) programme updated in 2008***

***Working Together non-statutory advice: Information Sharing (Sept 2018)***

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

***Equality Act 2010***

***Sexual Violence and sexual harassment between children in schools and colleges (May 2018)***

***Sexual Offences Act 2003***

***Relationships and Sex Education DfE (Sept 2021)***

***Human Rights Act 1998***

See also the School's policies as follows:

***Anti-Bullying Policy, Anti-Cyber Bullying Policy, CCTV Policy, Good Behaviour Discipline & Sanctions including Exclusions Policy, Special Educational Needs including Children with Learning Difficulties and/or Disabilities Policy, PSHEE & Citizenship, Relationships and Sex Education Policy, Implementing Prevent Policy, Privacy Notice, Recruitment and Selection Policy, Internet & Online-safety Policy, Taking, Storing & Using Images of Pupils Policy, Whistleblowing Policy & Procedures***

**Definitions or abbreviations used in this policy****ACPO:** Association of Chief Police Officers**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)**DfE:** Department for Education**EYFS:** Early Years Foundation Stage**FGM:** Female Genital Mutilation**GDPR:** General Data Protection Regulation**HBA:** Honour Based Abuse**ICT:** Information and Communication Technology**ISSR:** Independent Schools Standards and Regulations**LADO:** Local Authority Designated Officer for safeguarding of children (also known as the Designated Officer in some authorities)**LLC:** Low-Level Concerns - any concern, no matter how small, that an adult may have acted in a way that is inconsistent with our Staff Code of Conduct as it relates to behaviour towards children, including inappropriate conduct outside of work**LSCP: Local Safeguarding Children Partnership****KCSIE:** Keeping Children Safe in Education**KRSCP:** Kingston and Richmond Safeguarding Children's Partnership**Protected Characteristics:** age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief or sexual orientation**PSHEE:** Personal, Social, Health and Economic Education**SCR:** Single Central Register of Appointments**SEN:** Special Educational Needs**SENCO:** Special Educational Needs Co-ordinator**SEND:** Special Educational Needs and Disabilities**SPA team:** Single Point of Access team at the Borough for child safeguarding matters**SLT:** Senior Leadership Team**TA:** Teaching Assistant**The School:** Kew College Prep**UK:** United Kingdom**At Kew College Prep****DSL and Member of the SLT:** Robyn Hodgson**Deputy DSL and Head:** Jane Bond**Deputy DSL Early Years:** Selbi Fryer**Named Governor for Safeguarding:** Zohya Pavlu

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## 1. GENERAL

Kew College Prep is committed to safeguarding and promoting the welfare of its pupils and expects all staff and volunteers to share this commitment. We are committed to acting in the best interests of the pupil. The health, safety and well-being of all our pupils are of paramount importance to all the staff at Kew College Prep. The children have the right to protection, regardless of any Protected Characteristics. They have a right to be safe at school. All staff adopt the attitude of **'it could happen here'** where safeguarding is concerned. The School has a culture of safety, equality and protection where staff listen to children and where staff are able to raise concerns and are fully supported in their safeguarding role, enabling issues about safeguarding and child welfare to be addressed. We recognise that safeguarding is the responsibility of everyone at Kew College Prep and that **anyone** can make a direct referral if they feel their concerns are not being addressed. We recognise the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

All our staff are alert to the specific needs of children with special educational needs and young carers and recognise the additional barriers that exist for children with SEND, when recognising abuse and neglect in this group of children. These can include:

- 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
- communication barriers and difficulties in managing or reporting these challenges

The School operates in accordance with the locally agreed inter agency policies and procedures of KRSCP. For pupils in Richmond, concerns about a pupil should be referred to KRSCP on **020 8831 6323** or the SPA team on **020 8547 5008** from 8am to 6pm Monday to Friday or **020 8770 5000** emergencies out of hours/weekends and allegations about a teacher or other adult should be made to the LADO on **020 8547 5008** or **020 8770 5000** emergencies out of hours/weekends OR: **020 8891 7370 and 0777 4332675**  
[lado@achievingforchildren.org.uk](mailto:lado@achievingforchildren.org.uk).

The DSL and Deputy DSL can be contacted at school on **020 8940 2039**

For further details, see **Appendix 2**.

Local Partners in Kingston and Richmond have responded to the statutory changes outlined in the Wood Review – the new arrangements came into effect in September 2019. The Partnership is now known as KRSCP. In addition, under Section 26 of the Counter-Terrorism

and Security Act 2015 all schools are subject to a duty to exercise “due regard” to the need to prevent people from being drawn into terrorism. This is known as the *Prevent Duty*. Consequently, referral processes also exist when there are concerns about children who may be at risk of being drawn into terrorism. These referrals are made through the Channel Programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

The School respects its pupils. The atmosphere within the School is one that encourages all children to respect one another. We provide opportunities that enable our children to take and make decisions for themselves. The teaching of PSHEE and Citizenship, the teaching of relationships and sex education, the teaching of personal values and morality in Religious Education lessons, issues raised in assemblies and through visits and workshops, all help to develop appropriate attitudes in our pupils and make them aware of the impact of their decisions on others. Following the DfE guidance regarding teaching internet/ online safety in schools 2019, our pupils are taught how to recognise different risks in different situations, how to behave in response to them and give them age appropriate online - safety and social media awareness. (see Internet and Online-safety Policy)

The School has a culture of safe recruitment and adopts recruitment procedures that help deter, reject or identify people who might abuse children. We follow safer recruitment procedures as set out in part 3 of KCSIE (2023) and the current ISSR’s prior to unsupervised contact with children, and we require all adults employed in school to have an enhanced DBS check including a barred list check, in order to ensure that there is no evidence of offences or abuse involving children. Furthermore, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. For those in management roles, an additional check is carried out to ensure they are not prohibited under section 128 provisions. For those who have worked abroad, appropriate overseas checks are undertaken.

## 2. EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances, many of which are protected characteristics as per the Equality Act 2010. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

### 3. RESPONSIBILITIES

#### 3.1. Designated Safeguarding Lead (DSL)

The DSL is a member of the SLT and therefore has the appropriate status and authority within the School to take responsibility for Child Protection matters, including the implementation of the *Prevent Duty*, online safety and understanding the filtering and monitoring systems and processes in place. The DSL has contacts for liaison with the outside agencies in cases of suspected abuse, neglect and radicalisation. At times, she may designate the activities of the DSL to the Deputy DSL, but the responsibility remains with the DSL. The DSL is responsible for managing referrals and is expected to refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care; to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme; where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and where a crime may have been committed to the Police as required. The DSL is also expected to act as a source of support, advice and expertise for all staff; act as a point of contact with the safeguarding partners; liaise with the Head to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; as required, liaise with the "case manager" (as per Part four) and the LADO for child protection concerns in cases which concern a staff member; liaise with staff (especially teachers, pastoral support staff, IT Technicians, senior mental health leads and SENCOs) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a 145 referral by liaising with relevant agencies so that children's needs are considered holistically; liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health; promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School.

The DSL and Deputy DSL both receive Level 3 training in line with local requirements (updated at least every two years) in child protection and local inter-agency working

protocols. They also receive training in the Local Safeguarding Children's Board approach to Prevent duties.

All cases of safeguarding concerning children should be referred to the DSL in the first instance, but in their absence to the Deputy DSL. The Head must be informed in every case. Covid-19 arrangements at Kew College Prep ensure that there is effective DSL and Deputy DSL cover, if needed. Where safeguarding matters concern allegations against staff see Section 6 below.

### **3.2. Class Teachers and other Adults in the School**

Our IT provider maintains the filtering and monitoring systems, helps to provide filtering and monitoring reports and completes actions following concerns or checks to the system.

The School recognises that the class teacher is the first stage in the pastoral care of a child in the school. Class Teachers are well placed to observe outward signs of abuse, changes in behaviour or failure to develop or thrive. However, any person, including school secretaries, the Librarian, Music and Games teachers or other specialist teachers, TAs or club providers may well be the first person that a child turns to.

All adults in the school should be aware of their duty of care for the children, the importance of listening to them and taking their concerns seriously. All staff must recognise that to address risks and prevent issues escalating, it is important that children receive the right help at the right time, and the early signs of abuse, neglect and radicalisation are acted upon. (see **Appendix 1** of this policy) They should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. All school staff will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems

All staff must keep clear records, reassess concerns when situations do not improve, share information quickly with the DSL or Deputy DSL both verbally and with written notes and challenge inaction. They should report any concerns immediately to the DSL and in her absence to the Deputy DSL and they will ensure the Head is informed.

In addition, all adults in the school have a duty to raise concerns to the Head or DSL about the behaviour of other staff members or their colleagues, should they become aware that a child may be at risk. In the event of a member of staff having concerns regarding the behaviour of the Head, they should address the Chair of Governors without informing the Head first. Should a member of staff feel their concerns are not being addressed, including



concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, they should refer to the ***Whistleblowing Policy and Procedures***.

### 3.3. School Governors

The School Governors are also designated to take responsibility for safeguarding matters, including those covered by *Prevent Duty* and should be contacted should the DSL, Deputy DSL or Head be unavailable (or be the subject of alleged abuse). The Head's Report to the Governing Body informs the governors of current safeguarding practices and of the number of safeguarding cases in the school; anonymity is retained at all times. There is a detailed, minuted annual review by the full governing body of all safeguarding policies and procedures, safeguarding issues, the SCR and recruitment records. The annual review is kept in the DSL's locked cabinet. There is a Named Governor for Safeguarding – Dr Pavlu.

## 4. CONFIDENTIALITY

The School recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the School must contribute to inter-agency working in line with *Working Together to Safeguard Children (2018)* and share information between professionals and agencies where there are concerns.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and GDPR is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

The DfE 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."

All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or wellbeing. It is important that staff and volunteers tell the pupil in a manner appropriate to the pupil's age and development that they cannot promise complete confidentiality and that they may need to pass information on to other professionals to help to keep the pupil or other children safe.

However, the School also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect we maintain confidentiality at all times on a "need to know" basis. Information is stored in a confidential manner in a locked cabinet kept by the DSL. The DSL and the Head (and in their absence the Deputy DSL), must be informed immediately by the person suspecting abuse. The DSL and Head will discuss who else should be informed within the School.

We will always undertake to share our intention to refer a child to SPA team with their parents and carers unless to do so could put the pupil at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with SPA team on this point.

It is extremely important that should any allegation be made against a member of staff, including supply teachers, all staff that are aware of the allegation within the school should

make every effort to maintain confidentiality and guard against unwanted publicity while such an allegation is being investigated or considered. In accordance with the Association of Chief Police Officers guidance, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.

The School should take advice from the LADO, police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared; (In deciding what information to disclose, careful consideration should be given to the provisions of the *Data Protection Act 2018 and GDPR*, the law of confidence and, where relevant, the *Human Rights Act 1998*.)
- How to manage speculation, leaks and gossip;
- What if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it arises

## 5. PROCEDURE – RECEIVING A DISCLOSURE/ REPORT FROM A CHILD

If a child makes a disclosure or report of abuse of any kind to a school adult, he or she should be given support and reassurance, but **must not** be promised confidentiality. The teacher or other adult should listen to what the child has to say, but avoid asking leading questions about the abuse, although they may ask questions about the child's feelings and general welfare. Staff must not attempt to investigate any allegation as this may jeopardise police investigations. They should make notes as soon as possible after the child has made the disclosure and not in the presence of the child. Staff should then immediately write a full report for the DSL and Head distinguishing clearly between fact, observation, allegation and opinion of the child, noting any action taken in cases of possible abuse and signing and dating the report. This can be on paper or electronically on SchoolBase. Every attempt will be made to offer support for the child whilst at school and it is hoped that the School will provide an environment in which he/she can relax and spend the school day in complete confidence and safety.

## 6. SAFEGUARDING ISSUES AND PROCEDURE – CONCERNS ABOUT A CHILD

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

### Children in Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the

purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

### **Early Help Assessment**

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. The DSL or the Head will attend any relevant meetings and will follow agreed procedures. The Head will keep the School Governors informed at all stages.

### **6.1. Children at risk of significant harm**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.(Appendix 5)

Whenever any member of the School staff has a serious concern about a child or a reason to suspect that a child may have suffered abuse, the DSL and the Head, **must** be informed at once. Detailed and precise notes should be taken at all stages. See **Appendix 1** for definitions and symptoms of abuse, including Child-on-Child Abuse, Child Sexual Exploitation, FGM, HBA, Radicalisation, Domestic Abuse, Child Abduction and Community Safety Incidents, Children and the Court System as it pertains to family courts, and Children with family members in prison. Should it be suspected that a member of staff or other adult has committed the abuse then the procedures from **Section 6** must be followed. Should it be felt that that any concerns are not being addressed, for example, that a child is not receiving the support necessary or that the child's wellbeing is deteriorating, then the Head must be kept informed and if necessary, the local authority contacted (see **Appendix 2** for details).

When there are concerns that a child may be at risk, the DSL will discuss this matter within 24 hours of a disclosure, with the KRSCP or other relevant safeguarding children's board where the child is resident. This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the School should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate an allegation.

If it appears that a child has suffered or is likely to suffer significant harm, the DSL, after speaking to the Head and will make a referral immediately (and within one working day) by telephone to the local authority children's social care in the area of the child's residence. Subsequent actions will follow agreed inter-agency procedures. In the event of a crime being committed, the police must be informed immediately, including suspicions of FGM.

Although efforts should be made to inform parents, referrals to statutory agencies do not require parental consent and this will not be sought if there are reasonable grounds to believe that a child is at risk of significant harm. The advice of children's social care will be followed putting the child's best interests at the forefront at all times. The named governor for safeguarding will also be updated regularly when referrals are made.

### 6.2. Pupils at risk of radicalisation

If it appears that a pupil is at risk of radicalisation, or displays any indication that they have been exposed to extremism, the DSL must be informed immediately. The DSL will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care. Local referral processes should be followed when there are concerns about children who may be at risk of being drawn into terrorism.

Decisions to seek support for a child in need or at risk of radicalisation would normally be taken in consultation with parents, and the SPA team ask for the informed consent of parents before a referral is made. However, if there are reasonable grounds to believe that a child is at risk of significant harm and informed consent is not available, the referral should still be made, putting the child's best interests at the forefront at all times.

### 6.3. Female Genital Mutilation (FGM) and Honour Based Abuse (HBA)

HBA encompasses violent crimes and non-violent forms of criminal abuse, which have been committed to protect or defend the honour of the family and/or community. This includes FGM, forced marriage and other practices such as breast ironing.

In line with statutory guidance from April 2016, it is mandatory for all school staff to personally report to the police, cases where they discover that an act of FGM or HBA appears to have been carried out. Unless the school has good reason not to, they should still consider and discuss such a case with the Head and DSL who will involve children's social care as appropriate. The duty does not include 'at risk' or 'suspected' cases. In these cases, the teacher should follow local safeguarding rules.

### 6.4. Pupils going missing from education

The School will hold more than one emergency contact for each pupil 'where reasonably possible' including at least one emergency contact for each parent/carer. Twice daily attendance records are taken in school and attendance is tracked. Staff must report to the DSL any unexplained absences, any regular pattern of absences, any agreed absences that are prolonged and any indication that a pupil / family have a planned absence in term time that has not been approved by the Head. The Head, will report such absences to the Local Authority.

In addition, the following circumstances will also be reported to the local authority in which a child has;

- Continuous period of ten days of unauthorised absence (other than for reasons of sickness or leave of absence); or
- been taken out of school to be home educated; or
- **apparently** moved away; or
- been certified as medically unfit to attend; or

- been in custody for more than four months, or
- has been permanently excluded, or
- non-standard admissions or departures i.e. where a compulsory school-aged child leaves school before completing the school's final year or joins a school after the beginning of the school's first year.

In the case, of a child leaving the school when the next school is not known, the circumstance will be reported as soon as possible to the LA in which the pupil lives.

This duty arises as soon as the grounds above are met and in any event before deleting a child's name from the Admissions Register. The School is also under a duty to provide information to the local authority for standard transitions if requested.

A pupil may be deleted from the register for non-return within 10 school days after authorised leave of 10 school days or more, or after 20 school days unauthorised absence (in both cases, in the absence of illness or other unavoidable cause), once the school and local authority have jointly made reasonable enquiries as to the pupil's whereabouts and failed.

When a child moves school, in addition to handing over any child protection file securely, the DSL will share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.

### **6.5. Mental, Emotional and Physical Health**

Staff must report to the Head and the DSL, any observation of deterioration of a child's health, either mental or physical. This includes known medical conditions, such as asthma, but staff must also be alert to symptoms of mental ill-health, such as eating disorders or self-harming. Mental health problems can be a sign or indicator of abuse, neglect or exploitation. Systems and processes for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems, exist within the school and include, in addition to the documented process for a CAMHS referral, a list of mental health professionals is accessible to staff, parents and carers upon request. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

In line with KCSIE (2023) all staff receive training on how to recognise mental, emotional, and physical health related issues including those related to Adverse Child Experiences, contextual safeguarding, Child Criminal Exploitation and Child Sexual Exploitation.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in this Safeguarding Policy and speaking to the DSL.

The Head will keep the School Governors regularly informed at all stages.

## 6.6 Child-on-Child Abuse

All staff should be aware that children can abuse other children (referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff should understand that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Kew College Prep recognises that children with SEND or certain medical conditions may be more prone to peer group isolation or bullying than other children. Staff are alerted in these cases and measures are put in place to prevent any oversights in protecting these children from any form of child-on-child abuse.

## 6.7 Sexual Violence and Sexual harassment between Children

### Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing and may adversely affect educational attainment. Sexual violence and sexual harassment can happen online and offline and are never acceptable. All victims will be taken seriously, be offered support and protected. Every effort will be made to ensure their education is not disrupted. Other children at school and school staff will be supported and protected as appropriate.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. These offences include: Upskirting, Rape, Assault by Penetration, Sexual Assault including sexual touch. It is important to note that the age of sexual consent in the UK is 16 and a child under the age of 13 can never consent to any sexual activity. Sexual harassment is defined as unwanted conduct of a sexual nature that can occur online or offline. Sexual harassment can include telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual jokes or 'taunting', deliberately brushing up against someone or interfering with their clothes. Online sexual harassment may be stand alone or part of a wider pattern and may include: non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages including on social media and sexual exploitation in the form of coercion or threats.

Kew College Prep is a co-educational school and we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We will not tolerate or dismiss sexual violence or sexual harassment as 'banter', 'just having a laugh', or 'boys being boys'. We will never dismiss or tolerate challenging behaviour (potentially criminal in nature) such as grabbing genitalia or breasts, flicking bras or lifting up skirts. All forms of sexual violence and sexual harassment will be dealt with swiftly and within the laws as appropriate so that these offences are not normalised. Section 6 of this policy details the steps to be taken in the event of sexual violence or sexual harassment between children. Section 9 details procedures for dealing with sexual violence and sexual harassment between children as referenced in KCSIE (2023).

### Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed

towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. All can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL (and any deputies) should be 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, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.



## 7. CHILDREN WHO ARE LESBIAN, GAY, BI OR TRANS (LGBT)

Children who are lesbian, gay, bisexual, or trans (LGBT) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## 8. PROCEDURE – ALLEGATIONS OF ABUSE BY A TEACHER OR MEMBER OF STAFF

### 8.1. General

These procedures should be used in respect of all cases in which it is alleged that a 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 Low Level Concerns that do not meet the harms test. In this case, the concerns will be managed according to the process stipulated in the Low Level Concerns policy (**Appendix 3**).

This relates to staff, supply teachers, agency workers, volunteers or contractors who are currently working at the school regardless of where the alleged abuse took place.

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

Allegations against staff or volunteers 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. In the absence of the Head, the allegation should be reported to the Chair of Governors who should in turn inform the Head at the earliest opportunity and the Head will assume responsibility. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors and who will consult with the Named Governor for Safeguarding and LADO without informing the Head. If the allegation concerns the DSL, the person receiving the allegation should immediately inform the Head. In case of serious harm, the police should be informed from the outset.

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 DSL/Deputy DSL will inform the agency of its process of managing allegations (KCSIE, 2023). 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.

Contact details for the LADO are set out in **Appendix 2**.

For full details of the procedure that follows a referral see DfE Guidance; *KCSIE (2023)*. If there is a substantiated allegation against a member of staff, the School will undertake to work with the LADO to determine if there are any improvements to be made to the School's procedure or practice.

If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, police or local authority's social care services need to be involved and a strategy discussion should be convened. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take account of the fact that teachers are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour. The Head will not inform the accused person about the allegation until agencies have been consulted, and have agreed what information can be disclosed to the person. The Head will give due weight to the views of the LADO and will, in discussion with the Chair of Governors and/or Named Governor for Safeguarding, consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place.

Where it is clear that an investigation by the police or local authority children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the Head and Chair of Governors and /or Named Governor for Safeguarding. In those circumstances, the options open to the School depend on the nature and circumstances of the allegation and the evidence and information available, and will range from taking no further action to summary dismissal or a decision not to use the person's services in future. At all times, the member of staff accused should be kept informed of the situation.

Suspension should not be the default position – an individual should only be suspended if there is no reasonable alternative. In some such cases further enquiries will be needed to enable a decision about how to proceed. If so, the Head or Chair of Governors and /or Named Governor for Safeguarding should discuss with the LADO how and by whom the investigation will be undertaken. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

**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.

**Timescales**

It is in everyone's interest to resolve cases as quickly as possible with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. KCSIE states that 80% of cases should be resolved within one month and 90% of cases should be resolved within three months.

For those cases where it clear that the allegation is unsubstantiated or malicious they should be resolved within one week. 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.

**8.2. Supporting the member of staff**

Employers have a duty of care to their employees. The School will act to manage and minimise the stress inherent in the allegations and disciplinary process. Support for the individual is key to fulfilling this duty. A member of staff will be informed of a concern or allegation as soon as possible and given an explanation of the likely course of action, unless there is an objection by the local authority social care services or the police. They will be advised to contact their trade union representative, if they have one), or a colleague for support. They will also be given access to welfare counselling or medical advice provided by the School.

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.

**8.3. Resignations and 'Compromise 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 ‘compromise 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.

#### **8.4. Record keeping**

For all other allegations that are not found to be malicious, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is locked in the Head’s office until the staff member leaves the employment of the School. At this point any documentation is transferred to a sealed envelope and put on the person’s confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information, where appropriate, to be given in response to any future request for a reference within 10 years.

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.

#### **8.5. 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. Compromise 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”.

## **9. PROCEDURE - UNFOUNDED ALLEGATIONS**

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.

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.

If an allegation is determined to be unfounded or malicious, the LADO may refer the matter to the local authority children’s social care services to determine whether the child concerned is in need of services or may have been abused by someone else. In the event that an allegation is shown to have been deliberately invented or malicious, the Head, Chair of Governors and/or Named Governor for Safeguarding will consider whether any disciplinary action is appropriate against the person who made it, and the police may be asked to consider whether any action might be appropriate against the person responsible, even if he or she was not a pupil.

## **10. PROCEDURE – ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ABUSE AND ALLEGATIONS OF ABUSE BY A PUPIL OR PUPILS ON ANOTHER PUPIL**

It is essential that any allegation of abuse made by a pupil against another pupil/pupils in the school is dealt with fairly, quickly, and consistently, in a way that provides effective protection for all the children involved. Procedures relating to child-on-child abuse were added to KCSIE (2022). This is largely in line with traditional guidance on how to receive a disclosure.

Any allegation should immediately be reported to the Head and the DSL, or in her absence, the Deputy DSL.

Upon receiving a Disclosure/Report from a pupil, staff should remember the following key points relating to a disclosure:

- Do not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (with DSL or Children’s Social Care)
- It is important that the victim understands what the next steps will be and who the report will be passed to
- Listen carefully to the child, be non-judgmental

- Be clear about boundaries and how the report will be progressed
- Do not ask leading questions only prompt the child where necessary with open questions – where, when, what, etc
- Clear notes should be written up as soon as is practically possible that are factual in nature without any judgemental comment and passed to the DSL

The DSL will:

- Investigate if the incident is abuse, or an isolated instance of bullying or unkindness, in which case the matter will be handled in the normal framework for discipline. (See Behaviour and Discipline Policy)
- Determine the frequency, nature and severity of the incident
- Ascertain if the victim was coerced by physical force, fear or by a pupil or pupils significantly older than himself/herself or with power or authority over him
- Ascertain whether the incident involved a potentially criminal act

A distinction needs to be drawn between behaviour best dealt with by anti-bullying policies and more complex behaviour. A bullying incident should be treated as a child protection concern when there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.’ In such cases, the DSL will seek advice from the KRSCP/SPA team or other local safeguarding board in the area in which a child resides. Procedures will then be followed as for any other allegation of abuse.

During and subsequent to the investigation, all the children concerned will need support and, whether perpetrator or victim, will be treated as being “at risk”. They will continue to be monitored closely and supported after any investigation has closed. Whilst advice as to the nature of this will be discussed with the children’s social care and other agencies, the School will also give consideration to pastoral and other arrangements in the School and make any necessary adjustments. As with any other allegation, suspension for an alleged abuser will not be automatic, but will be considered if a pupil is deemed to pose a risk to other children in the School.

#### **11. PROCEDURE – ARRANGEMENTS FOR DEALING WITH SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN**

The school’s initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. In some cases, the victim may not make a direct report. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with Part One of KCSIE (2023) and as outlined in this policy. All staff are trained to manage a report of child-on-child sexual violence and sexual harassment.

Any allegation should immediately be reported to the Head and the DSL, or in her absence, the Deputy DSL.

The School follows 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 behaviour 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-for-schools-and-colleges.pdf](#) guidance

**Upon receiving** a Disclosure/Report from a pupil, staff should remember to follow the same key points relating to any other disclosure.

Action to take after a report of sexual violence and/or sexual harassment includes:

- Taking into consideration the wishes of the victim to give them as much control as reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- Determine the nature of the alleged incident and whether a crime has been committed then refer to the police and/or social services; if a crime has been committed the police and social services will be notified in parallel;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children;
- Is the alleged incident a one-off or a sustainable pattern of abuse? One-off incidents may be managed internally by the school however this process should be documented in detail and recorded safely

If sexting is found to be taking place, this should be reported to the DSL, and in her absence to the Deputy DSL, and dealt with as a safeguarding case. It should be noted that is illegal for children under the age of 18 to take or share with others, images that are of a sexually explicit nature. The police will always be informed when there is reason to believe that indecent images involving sexual acts with children under 16 years of age.

Pupils are taught about “sexting” in IT and PSHEE lessons, at the relevant age. Guidance on this can be found on the UK Council for Child Internet Safety: Sexting in Schools and Colleges.

The School will not wait for the outcome (or even the start) of a children’s social care investigation before protecting the victim and other children in the School including the alleged perpetrator. The DSL will ensure that any actions the school takes do not jeopardise a statutory investigation and will be in full compliance with KCSIE (2023). A risk assessment will be conducted help inform any decisions the school makes.

### **Confidentiality**

If a victim does not give consent to share information, staff may still lawfully share it if it can

be justified to be in the public interest, for example to protect children from harm and to promote the welfare of children. Rape, assault by penetration and sexual assaults are crimes and these should be immediately referred to the police. The age of criminal responsibility is ten and if the perpetrator is under 10, the crime must still be reported to the police.

## 12. GUIDANCE FOR CHILDREN

### 12.1. PSHEE & Citizenship Policy

It is important to make children aware of behaviour towards them that is not acceptable and how they can help keep themselves safe. The PSHEE & Citizenship programme provides opportunities for children to learn about keeping safe, including building resilience to the risks of radicalisation, and who to ask for help if their safety is threatened using age-appropriate examples and language. For example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kind of physical contact is acceptable and unacceptable;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure, including knowing when and where to get help;
- to respect other people's privacy and to recognise that they are also entitled to privacy, particularly in sensitive situations such as dressing, undressing, changing, bathing or showering.

Discussions about personal safety and keeping safe can reinforce the message that any kind of violence is unacceptable, let children know that it is okay to talk about their own problems and signpost sources of help. Raising these issues can lead children to bring up personal problems and concerns and staff delivering lessons on these subjects need to be prepared for that possibility.

The School continues to monitor children's behaviour on the internet. All school practices evolve in order to help children to adjust their behaviours in order to reduce risks, and build resilience, including to radicalisation and, in particular, in the use of electronic equipment and access to the internet.

### 12.2. E-Safety

See *Internet and Online-Safety Policy*

#### Filtering and monitoring

We have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges) guidance. We will 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



- our governing body reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe and we have a named governor for filtering and monitoring
- 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

As part of the PSHEE curriculum and the ICT and Computing Curriculum, children are taught how to keep themselves safe online and to understand the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. This includes the safe use of social media, and in particular “sexting”. (**See Appendix 1.**) Presentations are periodically made in assembly using age-appropriate material. The Lightspeed Filtering system, the Netsupport DNA monitoring systems and Classroom Cloud are in place to ensure that children are safe from inappropriate content, interactions and online conduct, including but not limited to sexual, terrorist and extremist material when accessing the internet in the School. These filters and monitoring systems are regularly checked. The appropriateness of filtering and monitoring systems will be assessed by the Systems Manager, alongside the ICT Manager with an overview by the Head, using the guidance provided by the UK Safer Internet Centre.

Latest resources promoted by DfE can be found at:

*The use of social media for on-line radicalisation*

*The UK Safer internet Centre ([www.saferinternet.org.uk](http://www.saferinternet.org.uk))*

*CEOP’s thinkyouknow website ([www.thinkyouknow.co.uk](http://www.thinkyouknow.co.uk))*

*DfE Guidance: Teaching online safety in schools 2019*

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

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

### **Remote Learning**

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No 1:1 conferences, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family ‘getting on’ with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff should record, the length, time, date and attendance of any sessions held.

### **Supporting pupils not in School**

Kew College Prep is committed to ensuring the safety and wellbeing of all its pupils.

Where the DSL has identified a pupil who would normally receive pastoral-type support in school, we will ensure that a robust communication plan is in place for that pupil. All contacts with the pupil must be recorded. The communication plans can include: remote contact; phone contact. Other individualised contact methods should be considered and recorded. Kew College Prep and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate. The school will share safeguarding messages on its website and any communications to families.

Kew College Prep recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at Kew College Prep will take this into consideration when setting expectations of pupils' work where they are at home.

### **12.3. Use of Mobile Phones by Pupils**

We know that, because many children have unlimited and unrestricted access to the internet via mobile phone networks, some children, while at school or college, 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 as follows:

- 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 after the February Half-Term in preparation for moving onto secondary School. The mobile phones are handed into the office 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. They are required to sign an 'Acceptable Use' contract prior to bringing their phone to school.

### **13. USE OF MOBILE PHONES BY ADULTS**

Adults includes staff, volunteers, parent committee, young people, parents, carers, visitors and community users. This list is not exhaustive.

### 13.1. Policy statement

Mobile phones, alongside other forms of technology are changing the way and speed in which we communicate. They can provide security and reassurance; however, there are also associated risks. Children and young people need to understand these risks in order to help them develop appropriate strategies for keeping themselves safe. Staff also need to understand these risks and their duty to protect children from risks at all times. As with online-safety issues generally, risks to children and young people can be broadly categorised under the headings of content, contact and conduct and managed by reducing availability, restricting access and increasing resilience.

Kew College Prep promotes safe and appropriate practice through balancing protection against potential misuse with the recognition that mobile phones are effective communication tools, which in turn can contribute to safeguarding practice and protection.

It is recognised that it is the enhanced functions of many mobile phones that cause the most concern, and which are most susceptible to misuse. Misuse includes the taking and distribution of indecent images, exploitation, sexting and bullying.

When mobiles phones are misused it can impact on an individual's dignity, privacy and right to confidentiality. Such concerns are not exclusive to children and young people; hence there is a duty to protect the needs and vulnerabilities of all. It is appreciated that it can be very difficult to detect when such devices are present or being used, particularly in relation to enhanced functions, such as cameras. The use of all mobile phones is therefore limited, regardless of their capabilities. The aim is to avoid distraction and disruption of the working day, and to minimise the opportunities for any individual to make any covert images or misuse functions in any other way.

Designated 'mobile' areas are situated within the setting. 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, and include:

- 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 personal or work-related mobiles by any individual in these areas 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**.

### 13.2. Code of Conduct for use of mobile phones by staff

A code of conduct is promoted with the aim of creating a cooperative workforce, where staff work as a team, have high values and respect each other; thus creating a strong morale and sense of commitment leading to increased productivity.

It is therefore ensured that all staff:

- Have a clear understanding of what constitutes misuse
- Are vigilant and alert to potential warning signs
- Know how to minimise risk
- Avoid putting themselves into compromising situations which could be misinterpreted and lead to possible allegations
- Understand the need for professional boundaries and clear guidance regarding acceptable use
- Are responsible for self-moderation of their own behaviours
- Are aware of the importance of reporting concerns promptly

### 13.3. Personal mobiles – procedures for adults

Effective guidance is in place to avoid the use of mobile phones causing unnecessary disruptions and distractions within the workplace, and to ensure effective safeguarding practice is promoted to protect against potential misuse.

In the interests of equality, and to further promote safety, the guidance applies to any individual who has a mobile phone on site, including parents and visitors, as detailed below:

- **Staff, Peripatetic teachers and Club providers** are permitted to have their mobile phones about their person with the **exception of the EYFS areas or other areas where EYFS children are being taught, where they MUST be kept locked away**. There is a clear expectation that all personal use is limited to allocated lunch and/or tea breaks or times when staff members are on non-contact and **only** in areas devoid of children.
- Other than in agreed exceptional circumstances, phones in school must be switched to silent and calls and texts must not be taken or made during contact time with children.
- **Staff** are not permitted to use their phones for taking, recording or sharing images of children and ‘mobile free’ areas must be observed at all times.
- **Staff** are not permitted to use their own personal phones for contacting children, young people and their families within or outside of the setting.
- **Staff** are permitted to use mobile phones at the Games field, Swimming pool, or trips and visits **for work related calls only** or in exceptional circumstances involving emergencies. Another exception is on residential trips and school trips where the Trip Leader may require to be in contact with the School; in this instance they should at all times aim to use their phone away from the children.
- **Parents, visitors and contractors** are respectfully requested not to use their mobile phones in any of the designated mobile free areas. Should phone calls and/or texts need to be taken or made, use is restricted to those areas not accessed by children in order to avoid any unnecessary disturbance or disruption to others.

**Emergencies over-ride all of the above and when Crisis Management Procedures are invoked.**

Further guidance for staff on the use of mobile phones is contained in the ***Staff Code of Conduct***.

## 14. TAKING, STORING AND USING IMAGES OF PUPILS

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

Under GDPR regulations, the School is not required to seek parental consent to take photographs and use video recorders for images that are necessary for the ordinary running of the School, or are in the legitimate interests of the School and its community, such as pictures of children working which will only be used in school

For other photographs, to protect children, we will:

- seek parental consent as per the ***Taking, Storing and Using Images of Pupils Policy***
- when photographs of pupils are published, we use only the child's first name with an image unless parents have consented for the pupil's full name to appear next to the image
- ensure that children are appropriately dressed
- encourage children to tell us if they are worried about any photographs that are taken of them

From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

CCTV is in use on School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the ***Privacy Notice and CCTV Policy***. All surveillance within the School is overseen by the Systems Manager in the event of a query. The CCTV camera is registered with the Information Commissioner's Office.

Under no circumstances is **any** individual permitted to take images of children or make recordings of children on a mobile phone with the exception of School Events (eg Summer Plays, School concerts, Sports Day, assemblies) when permission is given at the outset. Use of cameras and filming equipment (including mobile phones) by parents should be in accordance with the ***Taking, Storing and Using Images of Pupils Policy***. Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.

Any individual bringing a personal device into the setting should ensure that it contains no inappropriate or illegal content.

## 15. SECURE PREMISES

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

*Identification badges:* All Governors and members of staff, including volunteers will receive a photo ID badge on a lanyard, which must be clearly displayed and worn at all times whilst on the School premises in term time. The School has a colour code system for the lanyards to denote staff members, checked visitors and unchecked visitors.

*Visitors' record:* The School keeps an electronic record of all visitors at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' on a red lanyard which must be clearly displayed and worn at all times whilst on the School premises.

## 16. HEALTH & SAFETY, EXTENDED SCHOOL ACTIVITIES AND OFF-SITE VISITS

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

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

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

## 17. STAFF CODE OF CONDUCT

See Staff ***Code of Conduct*** and the ***Staff Procedures Handbook***.

All staff must ensure that their behaviour and actions are in keeping with the high standards of the School and promote pupils' well-being. It is also essential that they do not place pupils or themselves at risk of harm or of allegations of harm to a pupil.

Failure to comply with the School's ***Staff Behaviour Policy*** and Staff ***Code of Conduct*** may be regarded as gross misconduct and subject to disciplinary action.

Should staff have concerns about the actions of others they should refer and follow the ***Whistleblowing Policy and Procedures***.

## 18. RECRUITMENT OF STAFF AND VOLUNTEERS INCLUDING VISITING SPEAKERS

See *Recruitment and Selection Policy*.

The School follows procedures set out in KCSIE (2023) and Independent Schools Standards Regulations as detailed in the ISI Handbook for the Inspection of Schools – Commentary on the Regulatory Requirements (Sept 2021).

The School maintains the highest standard of care of its pupils and this includes thorough recruitment checks on all teaching and non-teaching personnel (and volunteers, including visiting speakers if they are to be left without the supervision of a regulated person). All applicants for any post will be subject to an enhanced criminal records check before any appointment can be confirmed.

In addition, teaching staff will be subject to a Prohibition Order check and for those working with Early Years pupils, or giving childcare (not co-curricular provision) for pupils under the age of 8 in before and after-school settings a check on Disqualification from Childcare. This check is undertaken annually. All staff will be given safeguarding training, according to current statutory guidance.

The *Prevent Duty* statutory guidance requires that the School has clear protocols for ensuring that any visiting speakers who might fall within the scope of the *Prevent Duty*, whether invited by staff or pupils, are suitable and appropriately supervised at all times.

## 19. EARLY YEARS FOUNDATION STAGE

In EYFS we will ensure that:

- there are enough staff per child (staff ratios), where relevant and applicable.
- Each child in the Early Years Foundation Stage is assigned a key person.
- appropriate arrangements are put in place for the supervision of staff who have contact with children and families.

### 19.1. EYFS Process if there is a safeguarding concern

The Designated Person for dealing with child protection issues in the Foundation Stage will be the DSL. As she does not specifically work with EYFS children, in certain circumstances she may delegate elements of the responsibility to the Head of Early Years, who may be better known to the child concerned. The Head, or in her absence the Deputy Head, will always be present at any parental or interagency meetings. The following is the case;

- (i) If EYFS staff have any concerns about children's safety or welfare, they should notify the DSL or in her absence the Deputy DSL immediately who will notify agencies with statutory responsibilities without delay. They in turn will inform the Head.
- (ii) The Head will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after EYFS children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations;

- (iii) The Head will inform Ofsted of the above, as soon as is reasonably practicable, but at the latest within 14 days of being made aware of the situation.

### 19.2. EYFS: Use of mobile phones

All EYFS areas are '**Mobile free**' areas as they are considered to be the most vulnerable and sensitive. Other 'mobile free' areas include changing areas in the cloakrooms, toilets and the medical room.

In **EYFS** areas or other areas where **EYFS** children are being taught, mobile phones **MUST** be kept locked away.

A zero-tolerance policy is in place with regards to the **use** of personal or work-related mobiles by any individual in these areas 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**.

## 20. TRAINING

Kew College Prep provides training for all staff in Safeguarding as set out below. Training records are securely stored by the DSL.

- a) The DSL and Deputy DSLs receive Level 2 and Level 3 Safeguarding training, and renewal training is provided before the existing certificate expires, which is at least every two years. In addition, they receive informal updates as set out in the job description 'Training' section.
- b) Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection training at induction. The training should be regularly updated.
- c) Some other members of the SLT may also receive Level 2 and Level 3 Safeguarding training; at any one time, other than immediately after changes in personnel, a minimum of four staff, including the DSL and Deputy DSL will hold current certificates. When this number falls due to changes in personnel, training for new staff will be provided as soon as practicable.
- d) In line with LSCP advice, all staff who do have in-date Level 2 and Level 3 certificates receive regular update training with an annual refresher. This training is delivered before the first day that pupils are on site at the start of the academic year; if staff are unable to attend, or join Kew College Prep during the academic year, this training will be delivered within two weeks of starting work.
- e) All staff are required to read and understand the current edition of KCSIE Part 1. School leaders and those working with children are also required to read Annex B. When a new edition of KCSIE is issued, all staff are required to read and understand Part 1 including Annex B within two weeks of the effective date of the new edition, and sign to confirm that they have read and understood both parts.



- f) Throughout the year, termly updates of information are provided as required, and informal updates and discussions about safeguarding matters are a regular feature at staff meetings.
- g) All staff undertake the HM Government e-learning training Course 1 on 'Prevent' training within four weeks of starting work at Kew College Prep, if they do not have an existing certificate. This gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people for further help. Staff will have to complete refresher courses when directed by the DSL.
- h) The DSL and Deputy DSLs must also complete Course 2 and Course 3. The training introduces the Prevent Duty and how it aims to safeguard vulnerable people from being radicalised to supporting terrorism.
- i)
- j) All staff are trained to manage a report of child-on-child sexual violence and sexual harassment.
- k) All staff are made aware of their role in the early help process.
- l) All staff are made aware of the process for making referrals to children's social care.
- m) All staff are trained to know what to do if a child tells them he/she is being abused, exploited or neglected.
- n) All staff are trained on how to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.
- o) In line with LSCP advice, induction training is given to all new staff and temporary staff and will include:
- The School's Safeguarding and Child Protection Policy\* including information about the identity and role of the DSL and Deputy DSL and response to children who go missing from education;
  - The Staff Code of Conduct including acceptable use of ICT, staff/pupil relationships and communication including use of social media\*
  - Whistleblowing Policy and Procedures\*
  - Internet and On-line Safety Policy\*;
  - Implementing Prevent Policy;
  - Staff Induction Policy\*;
  - The Good Behaviour Discipline and Sanctions Policy;
  - The School's safeguarding response to children who go missing from education\*;
  - A copy of part one of KCSIE (2023) including Annex B\* that they are required to read and understand; understanding is confirmed through a test which staff are required to undertake. (For staff who cannot read English provision is made through discussion with the DSL).

In addition, part of the induction training will include discussion of the School's Safeguarding and Child Protection Policy with the DSL. An Induction pack, including the asterisked (\*) policies above, will be provided to all new staff.

Trainers and coaches working unsupervised at Kew College Prep, such as sports coaches, music peripatetic teachers and club providers, who are not members of staff, also receive training in the following if they are unable to produce evidence of relevant training undertaken elsewhere:

- Level 1 Safeguarding training updated regularly;
- Reading and understanding of the current KCSIE Part 1 including Annex B;
- Information on how to contact the DSL or Deputy DSL and their duty to report matters of concern and to adhere to appropriate behavioural boundaries.

## **21. LOOKED AFTER CHILDREN**

Should any pupil be on role who are looked after by a local authority, the School Governors will ensure that staff have the skills, the knowledge and understanding necessary to keep such children safe. There is an appointed designated teacher for looked after children who is appropriately trained and this member of staff will be given responsibility for their welfare and progress and will; obtain up to date assessment information from the relevant local authority, the most recent care plan and contact arrangement with parents, and delegated authority to carers. This will follow the statutory guidance to local authorities about how they are to support schools with the care and education of these pupils.

## **22. MONITORING AND REVIEW**

Children who have been suspected of abuse are kept on a register by the Head and the DSL. Their welfare is reviewed regularly.

In order to maintain the effectiveness of the policy, the Head will ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.

The Governing Body undertakes a review of the school's child protection policies at least annually, including an update and review of procedures and their implementation and of the efficiency with which the related duties have been discharged. The Governors ensure that the school contributes to interagency working in line with Working Together (2018) through effective implementation of the Safeguarding and Child Protection Policy and procedures, and good cooperation with local agencies. The DSL and the Head work with School Governors on this.

Minutes of the review show its breadth and depth and include:

- Any changes to statutory guidance

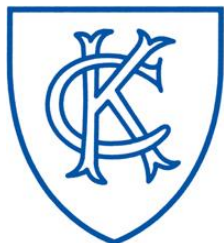
- Any written report or information presented by the DSL
- Referral information in respect of requests for help and support for individual children
- Any allegations against a member of staff and if relevant how the School work with the LADO to determine how the School could improve its practice
- Issues and themes which might have emerged in the school and how these have been handled
- Local discussions on safeguarding matters
- Staff Code of Conduct
- How pupils are taught to keep safe
- Recruitment procedures and a copy of the SCR for recent appointments
- Training records
- Risk assessment and other documents related to the *Prevent Duty*

### 23. JOB DESCRIPTIONS

There is a formal job description for the DSL and the Deputy DSL (**Appendix 4**).

<b>Reviewed by:</b>	<b>Approved by:</b>	<b>Updated by:</b>
The Full Governing body	Name: Jane Bond	Name: Robyn Hodgson
	Title: Head	Title: DSL
Date: 15 Nov 2022	Date: 08 Sep 2023	Date: 08 Sep 2023

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



## Appendix 1

### KEW COLLEGE PREP

## Recognising Child Abuse – Signs of possible abuse (definitions from KCSIE 2023)

**All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** is where somebody fails to prevent harm (neglect) or causes harm (abuse). We are aware that abuse, neglect and 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:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Staff should also have due regard to the following, **which should also be considered as abuse**, and should refer any child over which they have concerns to the Head and DSL.

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial; and
- emotional

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

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

- NSPCC: UK domestic-abuse Signs Symptoms Effects
- Refuge: what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse

### **Child-on-Child abuse**

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

### **Child Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is an age appropriate guides to support children 5-11-year olds:

<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

Making child arrangements via the family courts following separation can be stressful and trench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool

<https://helpwithchildarrangements.service.justice.gov.uk/> with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

### **Children with family members in prison**

Kew College Prep recognises that if a child has a family member in prison, they may be at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. To prepare for such an event, Kew College Prep will seek professional guidance and help to support children at our school who may be faced with this situation.

### **So-called ‘honour-based’ abuse**

So-called ‘honour-based’ abuse (HBA) encompasses 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. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

**Child sexual exploitation** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship

develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Child Criminal Exploitation** is where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

## RECOGNISING CHILD ABUSE – SIGNS AND SYMPTOMS

Recognising child abuse is not easy, and it is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk. You do, however, have a responsibility to act if you have a concern about a child's welfare or safety.

The following information is not designed to turn you into an expert but it will help you to be more alert to the signs of possible abuse. The examples below are not supposed to form an exhaustive list.

### i) Physical abuse

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which can almost only have been caused non-accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken. Patterns of bruising that are suggestive of physical child abuse include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks or fingertips

Although bruising is the most common injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. A doctor should see any child who has unexplained signs of pain or illness promptly.

Other physical signs of abuse may include:

- cigarette burns
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather

### ii) Emotional abuse

Emotional abuse can be difficult to measure, and often children who appear well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Children who live in



households where there is domestic violence can often suffer emotional abuse. Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse may include:

- failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached

### iii) Sexual abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- pain or itching in the genital areas
- bruising
- stomach pains
- discomfort when walking or sitting down
- Changes in behaviour that can also indicate sexual abuse include:
- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language
- bedwetting
- eating problems
- saying they have secrets they cannot tell anyone about

### iv) Neglect

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions.
- Changes in behaviour which can also indicate neglect may include:
- complaining of being tired all the time

- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

The above list is not meant to be definitive but should be used as a guide to assist you. It is important to remember that many children and young people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring.

There may well be other reasons for changes in behaviour, such as a death or the birth of a new baby in the family, relationship problems between parents/carers, undiagnosed medical conditions etc.

#### v) FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

- A girl may confide that she is to have a special procedure or to attend a special occasion to become a woman.
- Parents may state that they or a relative will take the child out of the country for a prolonged period
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent. For more information, see: DfE Multi-agency statutory guidance on FGM (updated 2018)

#### vi) Child Sexual Exploitation

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming.

*Some of the following signs may be indicators of child sexual exploitation:*

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

#### vii) Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. A child going missing from education is a potential indicator of abuse or neglect. Form teachers and office staff should report to the Head should any child be absent for more than one days without an explanation. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation (*For more information see: DfE Guidance: Criminal exploitation of children and young adults: county lines. 2017*). It may indicate

mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the Kew College Prep 'Unauthorised absence' and 'Children missing from education' procedures.

#### **viii) Radicalisation**

Symptoms of radicalisation may include absence of positive influences and strains associated with cultural transitions of identity, lifestyle and friendship. Young people at risk include those with limited social circles who befriend others on social media.



## Appendix 2

# KEW COLLEGE PREP

## Child Protection Contact Details

Full local procedures may be found on the following website:  
[www.richmond.gov.uk/local\\_safeguarding\\_children\\_board](http://www.richmond.gov.uk/local_safeguarding_children_board)

### **Kingston and Richmond's Children's Safeguarding Partnership**

Richmond upon Thames, Civic Centre, 44 York Street, Twickenham TW1 3BZ  
 Tel: 020 8831 6323

### **Kingston and Richmond's Single point of Access (SPA)**

Tel: 020 8547 5008 from 8am to 6pm Monday to Friday  
 Tel: 020 8770 5000 emergencies out of hours/weekends

### **LADO Local Authority Designated Officer**

Tel: Single point of Access listed above on 020 8547 5008 (out of hours and weekend 020 8770 5000) and ask to speak to the LADO or:  
 020 8891 7370 and 07774 332675 [lado@achievingforchildren.org.uk](mailto:lado@achievingforchildren.org.uk)

### **Single point of Access (SPA) Children's Integrated response unit for;**

Ealing, Acton and Hanwell: 020 8825 8000 or (out of hours: 020 8825 5000)  
 Hounslow's Child Protection Line: 020 8583 3068 (out of hours: 0208 583 2222)  
**NSPCC Whistleblowing Advice Line:** 0800 028 0285

**Police Child Abuse Line, (including reporting FGM): Call 999 if you think a child or young person is in immediate danger.** 101 (non-emergency police number) or National FGM helpline: 0800 028 3550 **DfE dedicated telephone helpline for preventing extremism in schools and mailbox for non-emergency advice for staff and governors:** Tel: 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk).

### **The Disclosure and Barring Services (DBS)**

DBS customer services  
 PO Box 3961  
 Royal Wootton Bassett  
 SN4 4HF  
 Tel: 0300 0200 190 [customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

### **DSL and DEPUTY DSL at Kew College Prep**

Robyn Hodgson (DSL), Jane Bond (Deputy DSL) and Selbi Fryer (Deputy DSL Early Years) can be contacted at school on 020 8940 2039

## **Additional Support and Advice**

### Abuse

- What to do if you're worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website
- Tackling Child Sexual Abuse Strategy – Home Office policy paper
- Together we can stop child sexual abuse – HM Government campaign

### Bullying

- Preventing bullying including cyberbullying - DfE advice

### Children missing from education, home or care

- Children missing education - DfE statutory guidance
- Child missing from home or care - DfE statutory guidance
- Children and adults missing strategy - Home Office strategy 141

### Children with family members in prison

- National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service

### Child Exploitation

- Trafficking: safeguarding children - DfE and Home Office guidance
- Care of unaccompanied and trafficked children – DfE statutory guidance
- Modern slavery: how to identify and support victims – Home Office statutory guidance

### Drugs

- Drug strategy 2017 - Home Office strategy
- Information and advice on drugs - Talk to Frank website
- Drug and Alcohol education — teacher guidance & evidence review – PSHE Association website

### “Honour Based Abuse” including FGM and forced marriage

- FGM: information and resources- Home Office guidance
- FGM: multi agency statutory guidance - DfE, Department of Health, and Home Office statutory guidance
- Forced marriage - Forced Marriage Unit (FMU) statutory guidance
- FGM resource pack – HM Government guidance Health and Well-being
- Fabricated or induced illness: safeguarding children - DfE, Department of Health, Home Office
- Rise Above: Free PSHEE resources on health, wellbeing and resilience - Public Health England
- Medical-conditions: supporting pupils at school - DfE statutory guidance
- Mental health and behaviour - DfE advice

Homelessness

- Homelessness: How local authorities should exercise their functions - Ministry of Housing, Communities & Local Government guidance

Private fostering

- Private fostering: local authorities - DfE statutory guidance 142

Radicalisation

- Prevent duty guidance- Home Office guidance
- Prevent duty: additional advice for schools and childcare providers - DfE advice
- Educate Against Hate website - DfE and Home Office advice
- Prevent for FE and Training - Education and Training Foundation (ETF)

Violence

- Serious violence strategy - Home Office Strategy
- Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office
- Youth Endowment Fund – Home Office
- Gangs and youth violence: for schools and colleges - Home Office advice
- Ending violence against women and girls 2016-2020 strategy - Home Office strategy
- Violence against women and girls: national statement of expectations for victims - Home Office guidance
- Sexual violence and sexual harassment between children in schools and colleges DfE advice

**Local Counsellors to Kew College Prep**

- 8 King Street, Richmond upon Thames TW9 1ND Tel. 020 8948 5980
- Bobbie Sutton Counsellor & Psychotherapist 020 8940 7628
- Richmond Borough Mind – 32 Hampton Road, Twickenham, TW2 5QB – 020 8948 7652



## Appendix 3

# KEW COLLEGE PREP

## Low Level Concerns Policy

### 1. Rationale and Purpose

As part of Kew College Prep's whole School approach to safeguarding, we ensure that 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.

A Low-Level Concern is any concern, no matter how small, that an adult may have acted towards a child in a way that is inconsistent with the sections of our School's Staff Code of Conduct which relate to acceptable behaviour around children, including inappropriate conduct outside of work. 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.

This policy sets out what low-level concerns are in more detail, sharing of LLCs, how Kew College Prep will respond to such concerns, including recording and reporting procedures.

### 2. Low-Level Concerns

The term LLC does not mean that it is insignificant. It means that the behaviour towards a child does not meet the following threshold:

- a) behaved in a way that has harmed a child, or may have harmed a child and/or
- b) possibly committed a criminal offence against or related to a child and/or
- c) behaved or may have behaved in a way that indicates that may not be suitable to work with children

The term '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 the 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 LADO

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door or
- 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.

### 3. Preventing LLCs

At Kew College Prep, we ensure that our 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. Training is provided to help them identify LLCs within the context of safeguarding.

### 4. 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.

### 5. 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 headteacher/ 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

The headteacher 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



headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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.

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.

## **6. 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, and action taken. 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. KCSIE 2023 states that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the harms threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

## **7. Role of the Governing Body**

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.



## KEW COLLEGE PREP

### Job description for DSL and Deputy DSL

The School Governors ensure that the School designates an appropriate senior member of staff to take lead responsibility for child protection (Designated Safeguarding Lead, DSL). This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. There should be regular review of the DSL's practice.

#### **Role of the Designated Safeguarding Lead (DSL)**

The DSL will take **lead responsibility** for safeguarding and child protection (including internet/online safety). This is explicit in the role holder's job description. They are given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

#### **Deputy Designated Safeguarding Lead (Deputy DSL)**

The Deputy DSL is trained to the same level as the DSL and the role is explicit in their job description. Whilst the activities of the DSL can be delegated to the Deputy DSL, the ultimate **lead responsibility** for child protection, as set out above, remains with the DSL, this **lead responsibility** will not be delegated.

#### **Managing Referrals**

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required; and
- Refer cases where a crime may have been committed to the Police as required

#### **Work with others**

The DSL is expected to:

- Act as a point of contact with KRSCP, which sets the local procedures
- Update the Head to inform her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Liaise with the "case manager" and the designated officer(s) (LADO) at the Local Authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially pastoral support staff, IT Technicians, and SENCOs or the named person with oversight for SEN) on matters of safety and safeguarding (including

online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies

- Be responsible for the safety, well-being and educational outcomes of children who have social workers; and
- Act as a source of support, advice and expertise for all staff

### **Training**

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the School's Safeguarding and Child Protection Policy and procedures, especially new and part time staff
- Are alert to the specific needs of children in need, those with special educational needs and young carers and recognise the additional risks that children with SEND face to any form of abuse
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- Understand the importance of information sharing, both within the School, and with safeguarding partners, other agencies, organisations and practitioners
- Are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Understand the unique risks associated with internet/online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- Recognise the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses; and

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them

### **Raise Awareness**

The DSL should:

- Ensure the School's Safeguarding and Child Protection policies are known, understood and used appropriately
- Ensure the School's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements

### **Child Protection file**

Where children leave the School, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where children join the School, we ensure key staff such as DSLs and SENCOs or the named person with oversight for SEN, are aware as required.

In addition to the child protection file, the DSL should also share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.

### **Availability**

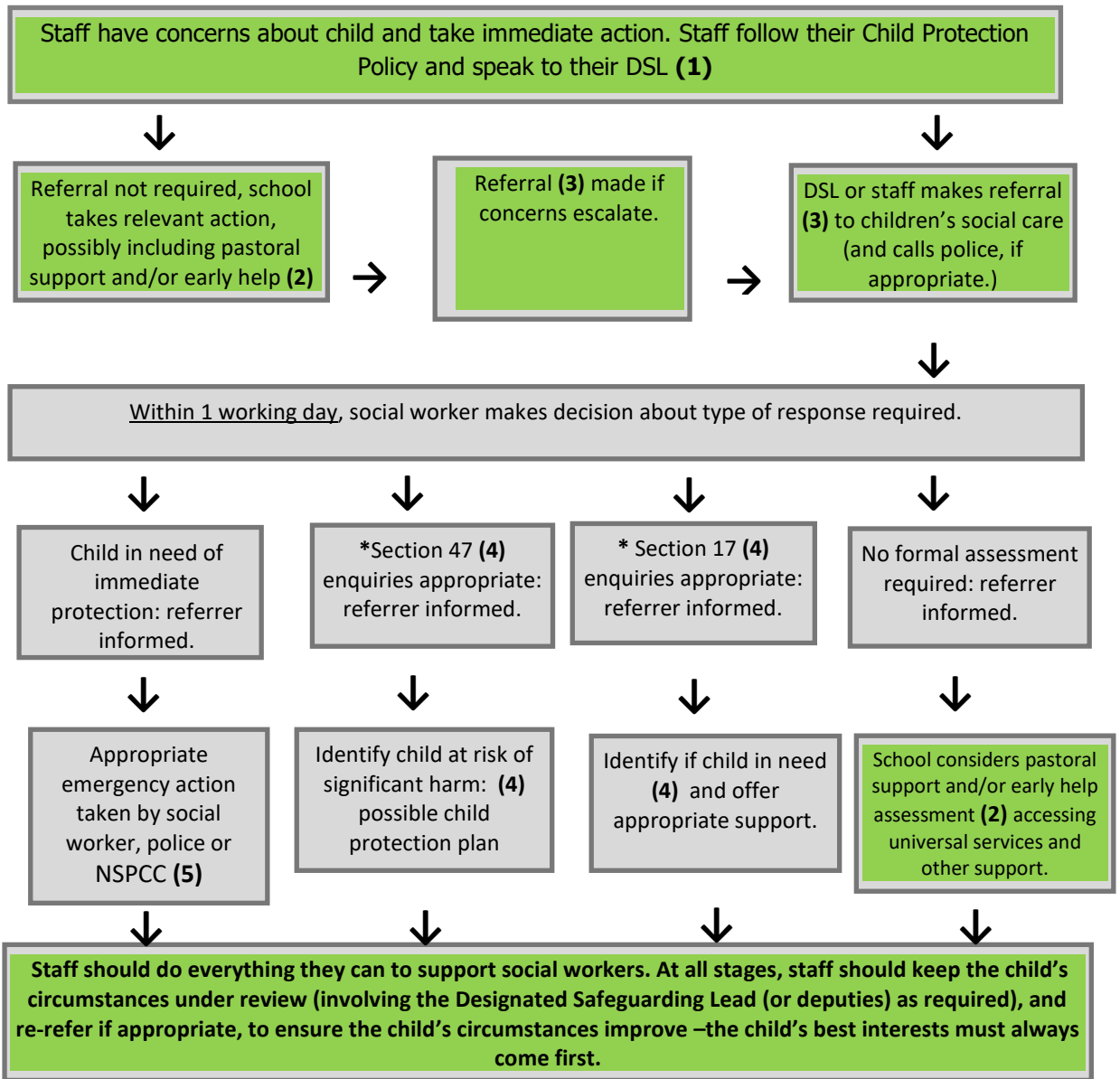
During term time the DSL (or the Deputy DSL) should always be available (during School hours either in person, by phone or email) for staff in the School to discuss any safeguarding concerns.



# KEW COLLEGE PREP

## Actions where there are concerns about a child

### Kingston and Richmond’s Children’s Safeguarding Partnership - Local Criteria for Action and Local Protocol for Assessments



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of KCSIE 2023..

(2) Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child’s welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

School Action

Other Agency Action

- Head – Jane Bond
- DSL – Robyn Hodgson; Deputy DSL — Jane Bond; Deputy DSL Early Years – Selbi Fryer
- Named Governor for Safeguarding — Zohya Pavlu