	Safeguarding and Child Protection Policy
	Updated: 01-26 Next Review: 09-26
	Prepared by: KED/JOH/TZL Approved by: Governors

This Policy applies throughout the School from the EYFS to Year 6 and is reviewed by the full board of Governors at least once a year.

Contents

Purpose of policy/mission statement

This policy sets out how the School will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes. The School will achieve this by providing a safe learning environment and ensuring School staff have the skills and knowledge to take action where pupils need extra support from early help services or require a social work service because they are in need or need to be protected from harm.

The School takes a holistic approach to safeguarding, and children's safety and welfare will be the key focus when developing policies so that the School environment and culture is one where:

- Pupils know how to raise concerns, feel safe to raise concerns and are confident that their concerns will be taken seriously
- Staff are equipped to deal sensitively and effectively with concerns and disclosures
- Inclusive and anti-discriminatory behaviour is an expectation for staff and pupils
- All forms of bullying, harassment and discrimination, or inappropriate, sexualised or offensive language and behaviour are not tolerated

The wishes and feelings of pupils are taken into account at all times.

Designated Safeguarding Lead (DSL) and EYFS Designated Person	Josie Hodgson Deputy Head (Pastoral) Mental Health Lead (MHL) Looked After Children Lead jhodgson@cavendish-school.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Maryam Kadhim SENCO mkadhim@cavendish-school.co.uk Callum Moore Senior Deputy Head (Strategy and Operations) cmoore@cavendish-school.co.uk
Designated Safeguarding Governor	Alice Gotto agotto@cavendish-school.co.uk
Chair of Governors	Alice Gotto agotto@cavendish-school.co.uk

	Nicola Rushton nrushton@cavendish-school.co.uk

Key internal contact details

Head	Mrs Taryn Lombard head@cavendish-school.co.uk
Online Safety Coordinator	Josie Hodgson jhodgson@cavendish-school.co.uk

Key external contact details

A) Local authority child protection contact details

Child Protection Service Manager Name: Kurt Ferdinand Tel: 020 7974 6481 **Local Authority Designated Officer (LADO)** Name: Jacqueline Fearon Contact details: 020 7974 4556 Email: LADO@camden.gov.uk
Camden Safeguarding Lead Officers Name: Michelle O'Regan (Head of Service – Children in Need) Tel: 020 7974 1905 Email: Michelle.O'Regan@camden.gov.uk Name: Tracey Murphy (Service manager) Tel: 020 7974 4103 Prevent Co-ordinator/Education Manager Name: Jane Murphy Tel: 020 7974 1008
Camden Children's Contact Service/MASH team Name: Fatima O'Dwyer (Manager) Tel: 020 7974 1553/3317 Fax: 020 7974 3310
LADO, Multi Agency Safeguarding Hub (MASH) Tel: 020 7974 3317 9am-5pm

Email: LBCMASHadmin@camden.gov.uk
Email: LBCMASHadmin@camden.gov.uk.cjsm.net (secure email)

Emergency Duty Team (Out of hours)
Tel: 020 7974 4444

First Stop Early Help
Tel: 020 7974 8791
Website: https://www.camden.gov.uk/early-help-for-families

B) Additional contact details

Child Abuse Investigation Team (Holborn Police Station)
Tel: 020 8733 6495/6507

Sapphire Unit Holborn Police Station
Tel: 020 8733 6490/6482
Website: www.londonscb.gov.uk

Preventing Extremism in Schools and Children's Services
Tel: 020 7340 7264
Email: counter.extremism@education.gov.uk

Online Safety Contact Officer
Name: Jenni Spencer
Tel: 020 7974 2866

Virtual School Head
Name: Sheila Durr
Tel: 07717 864385

C) Neighbouring borough local authority child protection contact details

Local Authority Designated Officer (LADO) ISLINGTON
Name: Timur Djavit
Tel: 020 7527 8102
Email: lado@islington.gov.uk
Address: Northern Health Centre, 580 Holloway Road, London, N7 6LB

For all other child protection enquiries, contact **Islington Children's Services Contact Team**
Tel: 020 7527 7400

Local Authority Designated Officer (LADO) HARINGAY
Name: Sarah Roberts
Tel: 020 8489 2968
Email: lado@haringey.gov.uk cc sarah.roberts@haringey.gov.uk
Alternative numbers: 020 8489 1031/5432/3205

D) Useful contacts

NSPCC Whistleblowing Advice Line
Tel: 0800 028 0285
Email: help@nspcc.org
Address: Weston House, 42 Curtain Road, London, EC2A 3NH

Disclosure and Barring Service
Tel: 03000 200 190
Email: customerservices@dbs.gov.uk
Email: dbsdispatch@dbs.gov.uk
Address: DBS customer services, PO BOX 3961, Royal Wootton Basset, SN4 4HF

Teaching Regulation Agency
Tel: 0207 593 5393
Email: misconduct.teacher@education.gov.uk
Address: Teacher Misconduct, Ground Floor South, Cheylesmore House, 5 Quinton Road,
Coventry, CV1 2WT

OFSTED Safeguarding Children
Tel: 0300 123 4666 (Monday to Friday from 8am to
6pm)
Email: Whistleblowing@ofsted.gov.uk

Independent Schools Inspectorate
Tel: 020 7600 0100
Email: concerns@isi.net

DfE Counter-extremism hotline
Tel: 020 7340 7264 (Monday – Friday 09.00 to 17.00)
Email: counter-extremism@education.gov.uk

Support and Advice about Extremism
Department for Education
Non-emergency tel: 020 7340 7264
Email: counter.extremism@education.gsi.gov.uk

Other School policies that refer to safeguarding

• Anti-bullying Policy for Pupils	• Non-collection of Pupils Policy
• Anti-harassment and Bullying Policy for Staff	• Online Safety Policy
• Attendance Policy and Procedure	• Physical Restraint Policy
• Children Missing or Absent from School Policy	• Prevent Policy
• Code of Conduct	• Procedures for Evacuation of People with Disabilities
• Code of Conduct for Other Adults	• PSHE Policy
• Complaints Procedure	• Pupil Mental Health Policy
• Contractor Policy	• Recruitment of Governors and Volunteers Policy
• Educational Visits Policy	• Relationships and Sex Education (RSE) Policy
• Equal Opportunities Policy for Employees	• Risk Assessment Policy
• Equal Opportunities Policy for Pupils	• Safeguarding Information for Volunteers and Visiting Speakers
• First Aid Policy	• Staff Safer Recruitment Policy
• Health and Safety Policy	• Supervision of Pupils Policy
• Intimate Care Policy	• Taking, Storing and Using of Images of Children Policy
• IT & Acceptable Use Policy	• Visitors and Visiting Speakers Policy
• Lockdown Procedures	• Whistleblowing Policy

Many of these policies can be found on the school website under 'About Us'.

Introduction

This policy applies equally to the Early Years Foundation Stage (EYFS) setting, Key Stage 1 and Key Stage 2 as taught at The Cavendish School. This policy is reviewed annually and upon changes and recommendations, by the Designated Safeguarding Leads (DSLs) and in conjunction with the Designated Safeguarding Governor, before it is reviewed by the governing body. The policy is available on the School website or upon request.

For the purposes of this policy, the term 'staff' refers to the Head, teachers, teaching assistants, administration personnel and site staff. Throughout this policy, parents, guardians and carers are referred to as 'parents'. References to children include anyone under the age of 18.

This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts
- Education (Independent Schools Standards) Regulations 2014 (as amended from time to time)

- The Independent School Standards Guidance for independent schools April 2019
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Children Act 2004
- What to do if you're worried a Child is being Abused March 2015
- Working Together to Safeguard Children (December 2023) (A guide to inter-agency working to safeguard and promote the welfare of children)
- Keeping Children Safe in Education September 2025 (part 5 specifically for guidance regarding sexual violence and sexual harassment)
- Disqualification under the Childcare Act 2006 (September 2018)
- Information Sharing: advice for practitioners providing safeguarding services May 2024
- DBS Referrals Guidance (as may be amended from time to time)
- ISI Commentary on the Regulatory Requirements
- Teacher misconduct: regulating the teaching profession March 2014 (and related guidance)
- Use of Reasonable Force in Schools July 2013
- Preventing and Tackling Bullying July 2017
- Mental Health and Behaviour in Schools November 2018
- Statutory framework for the Early Years Foundation Stage (EYFS), for group and school-based providers, September 2025
- Health and safety: responsibilities and duties for schools - GOV.UK
- Prevent Duty guidance (2023), Channel Guidance (2020), and Prevent Departmental Advice (2015)
- The use of social media for online radicalisation July 2015
- Teaching Online Safety in School January 2023
- Sharing nudes and semi-nudes: advice for education settings working with children and young people UKCIS December 2020
- Relationships, Sex and Health Education (RSHE) guidance (DfE, July 2025)
- When to call the Police: guidance for schools & colleges NPCC
- Keeping children safe in out of school settings September 2023
- The Charity Commission guidance - Safeguarding and protecting people for charities and trustees June 2022
- Camden Safeguarding Children Partnership (CSCP) multi-agency child protection procedures
- The London Safeguarding Children Board child protection procedures March 2025

[London Safeguarding Children Board: Child Protection Procedures](#)

The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its pupils (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns.

This policy also takes into account the procedures and practice of Camden Safeguarding Children Partnership (CSCP) as part of the inter-agency safeguarding procedures set up by Camden Local Safeguarding Partners.

The Designated Safeguarding Lead (DSL) and deputies must undertake relevant training, updated at least every two years, and Prevent awareness training. All staff receive safeguarding and online safety training at induction and regular updates at least annually. The DSL has oversight of online safety, including filtering and monitoring systems, and ensures low-level concerns and records are managed appropriately.

Concerns about a child

The staff and Governors are committed to safeguarding all its pupils. The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. **Safeguarding and promoting the welfare of children is everyone's responsibility.** Children with SEND and/or additional vulnerabilities: KCSIE highlights that children with SEND, or certain health conditions, may face additional barriers in recognising or disclosing abuse. Staff must take extra care to identify potential indicators of abuse and neglect in these pupils. The School adopts a **'whole school'** approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, including RSHE and online safety.

In line with KCSIE, the school recognises that children who are persistently absent or missing education may be at risk of harm. Staff must follow the school's procedures for recording, monitoring, and escalating concerns about attendance.

Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI (Independent Schools Inspectorate) directly if they wish.

Definitions of safeguarding and types and signs of abuse

Safeguarding

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online and digital abuse
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Safeguarding also includes ensuring that children are safe online. The school provides appropriate filtering and monitoring systems, which the DSL oversees in conjunction with the IT Manager, including online safety regarding Generative AI, misinformation, disinformation and conspiracy theories. The safeguarding governor receives an annual report on the effectiveness of these systems. Online safety is embedded in the curriculum, including RSHE, and staff receive regular training to identify and respond to online safeguarding issues, including low-level concerns. The school works in partnership with parents to promote safe online behaviours at home.

LADO

Local Authority Designated Officer(s) for Child Protection. Each local authority should have designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The term 'LADO' in this document is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology the local safeguarding partners may use.

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- **Physical abuse**
- **Emotional abuse**
- **Sexual abuse**
- **Neglect**
- **Child-on-child abuse (including sexual violence, sexual harassment, and harmful sexual behaviour)**

It also includes:

- **Child criminal exploitation (CCE);** *more details below*
- **Child sexual exploitation (CSE);** *more details below*
- **Domestic abuse (including children seeing, hearing or experiencing the effects of domestic abuse)**

All school staff should be aware that abuse, neglect, exploitation 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. All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. Staff must report any concerns without delay. Staff must maintain professional curiosity and avoid making assumptions about a child's situation. Abuse may be complex and may involve multiple overlapping forms. Concerns should always be recorded and shared with the DSL without delay.

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect, abuse or exploitation. Under the Children Act 1989, local authority social work services have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

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.

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. However, accidental injuries normally occur on the bony prominences – e.g., shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map accessed via CPOMS can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school. However, should they choose to remove clothing themselves observed injuries should be mapped.

Staff should be alert to fabricated or induced illness (FII), also referred to as "perplexing presentations," as set out in KCSIE 2025.

Indicators of physical abuse/factors that should increase concern

Physical abuse	- Injuries in unexpected places or that are not typical of normal childhood injuries or accidents - High frequency of injuries - Parents seem unconcerned or fail to seek adequate medical treatment - Multiple bruising or bruises and scratches (especially on the head and face) - Clusters of bruises – e.g., fingertip bruising (caused by being grasped) - Bruises around the neck and behind the ears – the most common abusive injuries are to the head - Bruises on the back, chest, buttocks, or on the inside of the thighs - Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle - Bite marks - Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette - Scalds with upward splash marks or tide marks - Untreated injuries - Recurrent injuries or burns - Unexplained bald patches

In the social context of the school, it is normal to ask about a noticeable injury.

The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- The explanation given does not match the injury
- The explanation uses words or phrases that do not match the vocabulary of the child (adult's words) no explanation is forthcoming
- The child (or the parent/carer) is secretive or evasive
- The injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- Is reluctant to have parents/carers contacted
- Runs away or shows fear of going home
- Is aggressive towards themselves or others
- Flinches when approached or touched
- Is reluctant to undress to change clothing for sport
- Wears long sleeves during hot weather
- Is unnaturally compliant in the presence of parents/carers
- Has a fear of medical help or attention
- Admits to a punishment that appears excessive

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

The nature of emotional abuse

- Most harm is produced in low warmth, high criticism homes, not from single incidents
- Emotional abuse is difficult to define, identify/recognise and/or prove
- Emotional abuse is chronic and cumulative and has a long-term impact
- All kinds of abuse, neglect or exploitation have emotional effects although emotional abuse can occur by itself
- Children can be harmed by witnessing someone harming another person – as in domestic violence
- Children with special educational needs and disabilities (SEND), or certain health needs, can be more vulnerable to emotional abuse and neglect. Staff must be alert to additional safeguarding challenges these pupils may face

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Issues	• Developmental delay • Attachment difficulties with parents and others • Withdrawal and low self-esteem • Delays in physical, mental and emotional development • Poor school performance • Speech disorders, particularly sudden disorders or changes
Behaviour	• Acceptance of punishment which appears excessive • Over-reaction to mistakes • Continual self-deprecation (I am stupid, ugly, worthless etc.) • Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking) • Self-mutilation • Suicide attempts • Drug/solvent abuse • Running away • Compulsive stealing, scavenging • Acting out • Poor trust in significant adults • Regressive behaviour – e.g. wetting • Eating disorders • Destructive tendencies • Neurotic behaviour • Arriving early at school, leaving late • Social issues • Withdrawal from physical contact • Withdrawal from social interaction • Over-compliant behaviour • Insecure, clinging behaviour • Poor social relationships
Emotional responses	• Extreme fear of new situations • Inappropriate emotional responses to painful situations ("I deserve this") • Fear of parents being contacted • Self-disgust • Low self-esteem • Unusually fearful with adults • Lack of concentration, restlessness, aimlessness • Extremes of passivity or aggression

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, or any violence whatsoever, whether or not the child is*

aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. This includes sexual abuse perpetrated by children against other children (child-on-child abuse). All staff should be aware of the importance of challenging inappropriate behaviours between peers, including those which are sexually harmful, even if they appear to be consensual or trivial. These behaviours can be a form of sexual harassment or sexual violence and must not be passed off as "banter" or "part of growing up.

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Characteristics of child sexual abuse:

- It is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives

Indicators of sexual abuse

Sexual abuse	• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development
	• Sexual risk-taking behaviour including involvement in sexual exploitation/older boyfriend
	• Continual, inappropriate or excessive masturbation
	• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy
	• Unwillingness to undress for sports
	Physical observations:
	• Damage to genitalia, anus or mouth
	• Sexually transmitted diseases
	• Unexpected pregnancy, especially in very young girls
	• Soreness in genital area, anus or mouth and other medical problems such as chronic itching

	• Unexplained recurrent urinary tract infections and discharges or abdominal pain **Behavioural observations:** • Sexual knowledge inappropriate for age • Sexualised behaviour or affection inappropriate for age • Sexually provocative behaviour/promiscuity • Hinting at sexual activity Inexplicable decline in school performance • Depression or other sudden apparent changes in personality as becoming insecure or clinging • Lack of concentration, restlessness, aimlessness • Socially isolated or withdrawn • Overly-compliant behaviour • Acting out, aggressive behaviour • Poor trust or fear concerning significant adults • Regressive behaviour, onset of wetting, by day or night, nightmares • Onset of insecure, clinging behaviour • Arriving early at school, leaving late, running away from home • Suicide attempts, self-mutilation, self-disgust • Suddenly drawing sexually explicit pictures • Eating disorders or sudden loss of appetite or compulsive eating • Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys • Become worried about clothing being removed • Trying to be 'ultra-good' or perfect; overreacting to criticism

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

Indicators of abuse, neglect or exploitation

Neglect	• Inadequate or inappropriate clothing • Appears underweight and unwell and seems constantly hungry • Failure to thrive physically and appears tired and listless • Dirty or unhygienic appearance • Unexplained and/or persistent absences from education

	• Lack of parental supervision • Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury • Lack of visiting medical personnel such as dentists for tooth decay or doctor for medical conditions
Indirect indicators of abuse, neglect or exploitation	• Sudden changes in behaviour • Withdrawal and low self-esteem • Eating disorders • Aggressive behaviour towards others • Sudden unexplained and/or persistent absences from education • Drug/alcohol misuse • Running away/going missing
Parental attributes	• Misusing drugs and/or alcohol • Physical/mental health or learning difficulties • Domestic violence • Avoiding contact with school and other professionals

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

Procedures for dealing with concerns about a child

Staff should bear in mind that children may not find it easy to disclose abuse and may need time before they feel ready to do so; in some cases, for example child exploitation, child-on-child abuse or online abuse, they may not recognise that what they are experiencing is abusive. Disclosure is more likely where there is a trusting relationship with the staff member and the pupil feels safe to share information.

It is important that where staff have reason to believe a pupil is at risk of harm but there is no disclosure, they persevere, giving the pupil time and space to disclose when they feel comfortable to do so. Any concerns should be shared with the Designated Safeguarding Lead so that advice and support can be offered on how to support the pupil to engage. Consideration should also be given to addressing any communications difficulties that may be a barrier to disclosure.

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. A flow-chart can be found in Appendix 3.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. **Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare, and protect the safety of children**, and neither the DPA 2018 or the UK GDPR present the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ('DSL').
All staff should:

- Listen carefully
- Avoid asking leading questions and understand the reason for this
- Reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and measures will be put in place to keep them safe
- Ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing and uploaded onto CPOMS. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead or their deputy). The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in parts one and two of *KCSIE*.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide (provided they are deemed old enough to make an informed decision). This is particularly important in the context of harmful behaviours such as sexual harassment and sexual violence. The School manages all concerns by speaking to the pupil and by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil at their heart.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur, including online environments and peer groups, recognising the risks of online abuse, grooming and radicalisation. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs

- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Is absent from education, particularly on repeat occasions and/or prolonged periods, including persistent absences for part of the school day
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or Alternative Provision or a Pupil Referral Unit
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect and/or exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the school's DSL. The DSL will consider the appropriate action to take in accordance with the Camden Safeguarding Children Board referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

What staff should do if they have concerns about a child

If staff (including Governors, supply staff, peripatetic teachers, club supervisors, contractors and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible act immediately and speak with the school's DSL to agree a course of action

although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should **maintain an attitude of "it could happen here".** If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including Governors, supply staff, peripatetic teachers, club supervisors, contractors and volunteers) believe that a child is in immediate danger or at risk of harm, they will contact the DSL, who will make an immediate referral to children's social care and/or the Police. In the absence of the DSL, anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the Police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Camden. A full copy of their local procedures can be found at https://cscp.org.uk/

Staff are reminded that they must ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, engaging in inappropriate electronic communication with a pupil, use of staff mobile phones, gifts, cards and notes etc.).

What staff should do if a child is seen as at risk of radicalisation

The school has a duty to work in partnership to safeguarding children from being drawn into radicalisation and terrorism. This is set out in the Prevent Duty guidance 2023.

Radicalisation is the process of a person legitimising support for or use of, terrorist violence.

Radicalisation is the process of a person legitimising support for or use of terrorist violence. Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism can also involve online radicalisation or the spread of extremist content through social media.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must

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

While there is no single method to determine whether a child might be susceptible to radicalisation, there are known factors that may raise concern. Staff should remain alert to changes in a child's behaviour—this may signal a need for support or protection, similar to other safeguarding concerns. Staff should exercise professional judgment and act proportionately.

The Prevent Duty guidance for education settings highlights key expectations:

- The primary goal is to tackle the ideological causes of terrorism, including by reducing permissive environments
- Information-sharing regarding concerns should be treated as with any safeguarding risk
- Training should be relevant and proportionate, with safeguarding leads receiving deeper insight into extremist ideologies to support informed referral decisions

School staff should promptly share any concerns with the Designated Safeguarding Lead (DSL) or Deputy DSL, who should be aware of local procedures before considering a Prevent referral.

The school should always be a safe space for young people to explore new ideas and perspectives and develop their critical thinking skills. Where there are concerns about radicalisation, these concerns should be shared with the Designated Safeguarding Lead and a decision taken as to whether concerns need to be raised with CSFH for a referral under the Prevent duty for support from the Channel Panel. If a pupil leaves, the DSL should consider whether it is appropriate to share safeguarding or Channel-related information with the receiving institution to ensure continuity of support.

What staff should do if they discover an act of female genital mutilation ('FGM')

Staff **must report to the Police** cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include unexplained and/or persistent absences from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC/UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- Carrying out interviews with the children involved (if appropriate)
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil, unless there is a good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services, such as children's social care and/or the Police, who would take the lead in deciding when they should be informed
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the Police immediately

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

What staff should do if a child goes missing from education

Children who go missing from education, particularly persistently and/or for prolonged periods, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse, and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School's procedures for unexplained and/or persistent absences from education and for dealing with children who go missing from education are outlined in the Children Missing or Absent from School Policy. Further details can also be found in Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to contact a responsible adult, particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Camden Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

CSFH social workers will inform schools whenever a child is receiving a service and the Designated Safeguarding Lead will keep a record of all pupils who have an allocated social worker and children who are living in kinship arrangements. Designated Safeguarding Lead.

The School will work in partnership with social workers and the Camden Virtual School Head so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unexplained and/or persistent absences from education or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support

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

Josie Hodgson, in her role as Deputy Head (Pastoral), is also the mental health lead and should be informed of any concerns regarding the mental health of pupils and staff.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a deputy.

The School has an important role to play in supporting the mental health and wellbeing of its pupils. The School aims to prevent mental health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. Staff can access a range of advice to help them identify children in need of extra mental health support, including working with external agencies.

More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

Responding to self-harm, suicide and mental health framework

The Cavendish School recognises that in order for pupils to be successful, the School and all staff have a role to play in supporting them to be resilient and mentally healthy. In addition, it is understood that mental health problems can themselves be a sign or symptom of connected safeguarding concerns for a young person and/or leave them vulnerable to other specific safeguarding issues.

The School also recognises that the early identification of mental health problems is critical in seeking to prevent the dangerous outcomes they can lead to such as suicide, self-harm or suicidal ideation. Children of concern are discussed every week as part of our staff briefing meeting. This allows all staff to be aware of any children who may need monitoring.

We need to know a lot more about why young people develop mental health problems, and the resources in people's lives that can help and hinder good mental health. The School is party to the multi-agency protocol on children and young people's mental health and will carry out its responsibilities under that protocol where there are concerns about a pupil's mental and emotional wellbeing.

The School acknowledges that any stigma, which is allowed to be, associated with mental health problems and any condemnation of young people presenting with self-harming behaviours undermines all attempts to promote good mental health and to address mental health problems.

Staff will also challenge the expression of views from pupils, colleagues or parents that mental health problems and self-harming behaviours are unimportant or dishonourable and where necessary, escalate such matters to the Senior Leadership Team.

The School will ensure that staff are teaching about mental wellbeing (as part of statutory health education and the revised RSHE guidance) to help reduce the stigma attached to mental and emotional problems and ensure pupils know how to keep themselves mentally healthy and know

how to seek support. The School will also ensure early identification of pupils who have mental health needs and put in place appropriate support and interventions, including specialist services, where needed.

Josie Hodgson is the School's Mental Health Lead. Pupils are offered 6 sessions of pastoral intervention as a starting point for pupils experiencing difficulties with mental health or emotional wellbeing. CPOMS allows for a joined-up approach to supporting individuals. Pupils who require additional support are discussed at staff meetings and SLT meetings to ensure that these children are not overlooked. We work closely with parents to ensure the best outcomes for children who are experiencing difficulties. We make or support referrals to CAMHS or other outside agencies as appropriate.

The Cavendish School staff recognise that pupils experiencing a range of behaviour or emotional problems that are outside of the normal range of their age or gender could be displaying signs or symptoms of mental health problems. Such problems could include emotional disorders (phobias or anxiety states), conduct disorders (defiance or ASB), hyperkinetic disorders (attention and disturbance), developmental delays, attachment difficulties or eating disorders.

Class teachers and other school leaders involved in pastoral care and safeguarding meet informally and all concerns are raised on CPOMS. Where concerns are raised that a pupil may be experiencing mental health problems, the concerns will be shared with the DSL and then with the pupil and with the family before deciding together on the best approach. Examples or observations of behaviour associated with mental health disorders will be recorded on CPOMS appropriately. Actions might involve making a referral to local healthcare professionals, such as CAHMS or the local GP. Referrals to CAMHS can come from parents/carers, a teacher or a GP. The School can also write to the GP. Staff are not qualified to provide counselling to children who may require it, but individual members of staff would be happy to listen to children talking through their concerns.

Where mental health problems present a persistent barrier to learning, it may be appropriate to identify the pupil as having SEND (special educational needs and disabilities) and such a decision should be taken by the School SENCO in collaboration with the DSL.

Staff at The Cavendish School acknowledge that significant life events can lead to mental health problems for some children, regardless of the number of risk and protective factors in their lives. These may include loss or separation, life changes, or traumatic events and staff are alert to the need to offer immediate intervention where necessary in response to such events and know to seek advice about such matters from the DSL. Despite the best efforts of all staff at The Cavendish School, the more dangerous outcomes of mental health problems (self-harm and suicidal ideation) cannot always be prevented. In such instances, the School will make every effort to address them sensitively and effectively in partnership with families, healthcare professionals and other extended services.

Where self-harm, threats of self-harm or suicidal ideation are known to have taken place, staff at The Cavendish School must inform the DSL immediately. It may be necessary in such circumstances for the pupil to be taken to the local accident and emergency centre, to receive first aid at school or to have an emergency GP appointment arranged by the family. All such decisions would be taken by the DSL in collaboration with the pupil and the family, where appropriate to do so.

What to do if you are concerned about a young person's mental health

- Member of staff becomes concerned about a child's mental health
- Initial concerns to be raised on CPOMS
- Member of staff informs and discusses this with the DSL
- Head and or class teacher/DSL/SENCO shares concerns with the parents
- Agreed course of action. Action may require a referral made to CAMHS by GP, parents or School

Further information can be found here:
https://cscp.org.uk/wp-content/uploads/2021/05/Interim-multi-agency-protocol-on-children-and-young-people%E2%80%99s-mental-health-2021.pdf

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including Governors, supply staff, peripatetic teachers, club supervisors, contractors and volunteers), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of the concerns not being managed by the Chair of Governors, staff are aware that they can refer the matter directly to the designated officer(s) at the Camden local authority.

The DFE has issued statutory guidance which all schools and local authorities must follow when a potential child protection allegation is made against a member of staff. The guidance is contained within the document: Keeping Children Safe in Education (September 2024). It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer will comply at all times with statutory guidance.

What staff should do it they have concerns about safeguarding practices in the school

The school aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures, which can be found in the Employee Handbook and on the School website in the Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith. If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the key contacts page at the start of this policy.

Arrangements for dealing with child on child allegations (including child on child sexual violence and harassment)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or girls being girls. Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. All concerns and incidents of child on child abuse must be reported to the DSL immediately.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well-promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure, the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regard to child on child abuse and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously, regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. These children would be supported by the Deputy Head (Pastoral) and/or the SENCO. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Camden Safeguarding Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the alleged victim and perpetrator(s). In the unlikely event that it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Camden Safeguarding Partnership, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Camden Safeguarding Partners and/or the Police as appropriate. The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. If the DSL decides to make a referral to children's social care and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Camden Safeguarding Children Executive referral process.

The School's approach to sexting is that it is forbidden.

The School will follow the DDMSC/UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Senior Leadership Team and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report, nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns (all concerns must be reported to the DSL immediately), including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified, the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour Policy.

Arrangements for dealing with safeguarding concerns or allegations of abuse regarding teachers, including supply staff and other staff (including Governors, supply staff, peripatetic teachers, club supervisors, contractors and volunteers)

The School's procedures for managing allegations against staff (including Governors, supply staff, peripatetic teachers, club supervisors, contractors and volunteers) who are currently working in the School whether in a paid or unpaid capacity, follows DFE statutory guidance and Camden Child Safeguarding Board arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a child; and or
- Possibly committed a criminal offence against or related to a child; and or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school

Allegations that do <u>not</u> meet the above harms test should be dealt with using the School's procedure for handling low-level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the Local Authority's designated officer or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

When dealing with allegations about a staff member, the School will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

Concerns, including allegations about a staff member, should be investigated as a priority to avoid any delay.

1.   **Concerns, including allegations which appear to meet the above reporting criteria, are to be reported straight away to the 'case manager', who is the Head OR in her absence, to the DSL, or the DDSL in the DSL's absence. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where allegations are reported to the DDSL, the DDSL will keep the Head**

informed. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chairs of Governors. The Chair of Governors will refer the allegation to the LADO. Where the Head OR DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and the designated officer.

2.   The case manager should immediately refer the allegations to the LADO and then discuss the allegation with the LSCP designated officer (LADO) and consider the nature, content and context of the allegation and agree a course of action, including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or in an emergency situation, the case manager should contact children's social care and, as appropriate, may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3.   Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer (LADO) to make a referral to children's social care. When to inform the individual, who is the subject of the allegation, will be considered on a case-by-case basis and with guidance from the designated officer, and if appropriate, the Police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

4.   The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the school or whether alternative arrangements should be put in place until the allegation is resolved. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

5.   Where further enquiries are required to enable a decision about how to proceed, the designated officer and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is a lack of resources, or the nature or complexity of

the allegation requires it, an independent investigator may be appointed to undertake the investigation.

6.   The case manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

7.   The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

8.   The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teacher Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

9.   On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in

accordance with KCSIE and a copy will only be provided to the individual concerned. Other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's Behaviour Policy, or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Arrangements for dealing with safeguarding concerns or allegations of abuse about supply teachers and contracted staff

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and cooperate with any enquiries from the LADO, Police and/or children's social care services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations, but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the

School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Low-level concerns

Arrangements for dealing with low-level concerns or allegations (that do not meet the criteria for an allegation or the harms test) about teachers and other staff (including the Head, Governors, peripatetic teachers, club supervisors, supply staff, volunteers and contractors).

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The aim of the School's code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as not to place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the Head/case manager (see p.25 point 1 for clarification) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. If the low-level concern relates to the Head, it should always be shared with the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or, on reflection, they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the case manager will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing by the Head/case manager. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR[1] at all times. The information will be retained for 10 years or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the Head/case manager. The concern will be recorded in accordance with the School's low-level concern policy, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Safer recruitment

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example; right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history, online

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[1] **"Data Protection Legislation"** means any data protection legislation from time to time in force in the UK including the Data Protection Act 2018 and the UK General Data Protection Regulation (or any successor legislation).

and social media checks, and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors, contractors and volunteers to work with children and young people is set out in the Staff Safer Recruitment Policy and Recruitment of Governors and Volunteers Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Visitors and Visiting Speaker Policy.

Alternative education provision

Whenever the school places a pupil with an alternative education provider, the school will remain responsible for safeguarding the pupil and will ensure that the setting meets the pupil's needs.

The school will obtain written confirmation of the provider's safeguarding and child protection policies and ensure that appropriate safeguarding checks on individuals working at the establishment have been carried out.

The school will carry out a further risk assessment when they have been notified of any changes to safeguarding arrangements at the alternative provision.

The school will keep records of the expected location of any pupil attending off-site provision during the school day and carry out reviews of alternative provision on a half-term basis to ensure the pupil continues to attend, taking appropriate action where safeguarding issues arise.

The school recognises that alternative provision may increase risk for vulnerable pupils and will follow the relevant government guidance:

https://assets.publishing.service.gov.uk/media/67a1ee367da1f1ac64e5fe2c/Arranging_Alternative_Provision_-_A_Guide_for_Local_Authorities_and_Schools.pdf

https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school

https://www.gov.uk/government/publications/alternative-provision

Use of the School premises by other organisations

The School will only allow use of its premises by other organisations outside of school hours involving children if the organisation can demonstrate it is able to keep children safe. The governing body will ensure:

- The organisation's incorporating document allows this

- The organisation provides an overview of what its intended activities so that the board of governors is able to make a judgement on whether this is in line with the promotion of British values
- The organisation provides copies of child protection policies and procedures and the School accept these as adequate
- The organisation provides evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks
- The following reasonable and due diligence checks are taken out on the organisation by the School:
    - an internet search on the organisation
    - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)
    - checks with Prevent Education officer (020 7974 1008)
    - checks with Camden Community Safety and the local police (020 7974 2915)
- Details of the organisation's responsibilities with regard to keeping children safe are recorded on the lettings agreement record with clear provision for the circumstances under which the agreement can be terminated by the School for breach

Organisations will be expected to meet the requirements set out in the Department of Education guidance below before the School will allow its premises to be used.

https://assets.publishing.service.gov.uk/media/6509558022a783000d43e81f/After-school_clubs__community_activities_and_tuition_safeguarding_guidance_for_providers.pdf

Any allegations arising from incidents happening when the School is being used by another organisation should be dealt with by the School under the CSCP Guidance for schools on dealing with allegations against staff and volunteers. Guidance-for-schools-on-dealing-with-allegations-against-staff-2022.pdf (cscp.org.uk).

Should the school receive an allegation relating to an incident that happened when an individual or organisation was using the school premises, as with any safeguarding allegation, the Safeguarding Policy and Procedures should be followed, including informing the LADO. The need to inform the School's DSL/DDSL will be contained in the letting agreement.

Management of safeguarding

The School's DSL is Josie Hodgson who is also a member of the Senior Leadership Team.

Maryam Kadhim and Callum Moore are the DDSL's to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

Josie Hodgson is the DSL for the EYFS.

The DSL and DDSL's contact details can be found on the key contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL also acts as the schools Online Safety Coordinator and takes lead responsibility for

online safety and understands the filtering and monitoring systems and processes in place (detailed information can be found in the School's Online Safety Policy).

The DSL's responsibility is to maintain an overview of safeguarding within the School, to oversee child protection systems (CPOMS) including the management of records, standards of recording concerns and referral processes, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the Police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the Governors to review and update the School's safeguarding policy.

In addition to these duties, the DSL will undertake a Prevent risk assessment, which is shared with all staff. Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL or DDSL or a member of staff who has advanced safeguarding training will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out-of-hours/out of term activities, the School's arrangements are that all staff have phone numbers for the DSL and DDSL.

The DSL or Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*. "NPCC - When to call the Police" can assist the DSL or Deputy DSL in understanding when they should consider calling the Police and what to expect when they do.

The School participates in Operation Encompass, a police and education early information sharing partnership. Where a child has experienced or been exposed to domestic abuse, the local police notify the school before the start of the next school day. The DSL or DDSL will use this information to ensure that staff are aware and can provide timely pastoral support, monitor the child's well-being, and implement any safeguarding interventions required.

The DSL or DDSL will also be responsible for liaising with the mental health lead and, where available, external agencies, where safeguarding concerns are linked to mental health. In their capacity as the school's mental health leads, they will also:

- Use their best judgement and make referrals to the child's local CAMHS team as appropriate, where their safeguarding concerns are linked to mental health issues
- Build staff confidence on recognising mental health and pupil's knowledge and understanding of who/where to go to seek help and advice
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training annually including online safety training (this training includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), to identify the early signs of child on child abuse and sexual violence and sexual harassment

Lead termly safeguarding meeting with the Head and the safeguarding Governor in order to facilitate best practice

Whilst the Head should ensure that the policies and procedures adopted are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found in Annex C of *KCSIE*.

Training

Induction and training are in line with advice from Camden Safeguarding Children Board.

All staff

All new staff will be provided with an induction that includes:

- Safeguarding and child protection training, including online safety
- Details of the role and identity of the DSL and DDSL
- Being provided with the following school policies:
    - Safeguarding and Child Protection Policy (this policy), which includes the procedures to deal with child on child abuse
    - Behaviour Policy and Anti-bullying Policy for Pupils (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
    - Staff Code of Conduct, Whistleblowing Policy and Procedure, Online Safety Policy and the IT & Acceptable Use Policy, which includes information regarding staff/pupil relationships and communications, including the use of social media
    - Children Missing or Absent from School Policy, which covers children who go missing from education
- Being provided with other relevant documentation:
    - Part one and Annex B of KCSIE
    - School leaders will also be required to read their relevant section/s of KCSIE
    - Employee handbook

Peripatetic and visiting teachers, club supervisors, temporary staff and volunteers are provided with:

- Safeguarding and child protection training
- The School's Safeguarding and Child Protection Policy (this policy)
- Behaviour Policy and Anti-bullying Policy for Pupils
- The Code of Conduct for Other Adults, including the Whistleblowing Procedure
- The role, identity and contact details of the Designated Safeguarding Lead and Deputy DSL
- Children Missing or Absent from School Policy
- Part 1 (and Annex B) of KCSIE

All staff are also required to:

- Read and understand Part One and Annex B of KCSIE and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes
- Receive training in safeguarding and child protection, at least annually, in line with advice from the Camden Safeguarding Children Board. Training will include online safety and harmful sexual behaviours, including child on child sexual violence and harassment. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. It will also include training on how to manage a report of child on child sexual violence and sexual harassment
- Undertake regular informal updates at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails and staff meetings

DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the Camden Safeguarding Children Board approach to Prevent duties and harmful sexual behaviours. The DSL will liaise with the Camden Virtual School Head in order to meet the educational needs of children known to CSSW. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children, including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL and have oversight of safeguarding, including arrangements for reviewing policies and procedures.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including possible lessons learnt by the school. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

The Head

The Head will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- All staff are aware of their role and responsibilities for safeguarding under Part 1 of the guidance Keeping Children Safe in Education (2024)
- Staff are inducted thoroughly in line with the New Staff Induction Policy
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are safeguarding and child protection concerns and can make appropriate referrals to CSFH
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff in line with the Safer Recruitment Policy
- Ensures that the roles and responsibilities of the DSL/DDSLs as referenced in Annex C of KCSIE (2025), are reflected in their job description
- Ensures that the DSL has appropriate time, training, and resources, and that there is always adequate cover if the DSL is absent
- Acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff) or volunteer, where appropriate
- Ensures that the school offers a safe environment for staff and pupils to learn
- Ensures that Safeguarding issues are brought to the attention of the governing body

Governing Body

All Governors receive appropriate safeguarding and child protection (including online) safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The Governors are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding

arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR). Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR). The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, the Governors comply with the DfE's Data Protection guidance for schools, ensuring school staff and Governors know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

Alice Gotto, the governor with responsibility for safeguarding, meets with the DSL and DDSLs at least three times a year. Children of concern are discussed together with trends and impacts of School safeguarding practices. Each meeting also focuses on a particular area of safeguarding to ensure best practice.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority Designated Officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. In the event that safeguarding concerns or an allegation of abuse is made against the Head, the Chair of Governors will act as the 'case manager'.

All Governors and trustees receive annual safeguarding and child protection training needed to help them effectively scrutinise school/college safeguarding and child protection policies so that they can ensure policies are fit for purpose.

The School's arrangements to fulfil other safeguarding responsibilities

Teaching children how to keep safe

There is growing concern about how technology can be misused to bully or harass, e.g. sending unpleasant e-mails or text messages, or posting comments or images on the Internet. The non-personal nature of communicating electronically seems to allow young people to behave in a way which would be far more difficult if they were having face to face contact.
To help address these problems schools should ensure that they:

- Educate pupils and parents of the potential dangers of the misuse of technology and how they can protect themselves through curriculum delivery, specific online safety programmes, and special whole school events
- Educate pupils about cyberbullying, and treat cyberbullying as a safeguarding issue where appropriate
- Educate pupils about sexting, and make it clear that this is regarded as a child protection issue
- Educate pupils about artificial intelligence, and the risks it poses, as well as the opportunities it presents
- Ensure reporting procedures are accessible and well-known to pupils

- Communicate any restrictions and consequent sanctions that may be imposed in order to promote the ICT Acceptable Use Agreement to all pupils (according to their age and understanding), parents and guardians
- Make pupils aware that the ICT Acceptable Use Agreement applies to behaviour towards staff and volunteers as well as pupils, both inside and outside school
- Encourage close liaison between school technical staff and Designated Safeguarding Leads in order to:
  - Be alert to guidance and best practice developments in this complex and evolving area
  - Ensure systems are in place and used to monitor, identify and respond to issues/concerns raised or suggestions to improve practice in their school
- Periodically review/audit online safety systems and arrangements used in school: we currently use the LGfL template

Any concerns about the misuse of technology by pupils or staff should be reported:

- Pupils should inform their class teacher or the DSL
- Staff and volunteers should inform their line manager or the DSL
- The DSL should report to the Head

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE, to help children adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and 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. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's computing curriculum and also embedded in PSHE and Relationships and Sex Education (RSE).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the school's IT system. The School's systems are Smoothwall, such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials (including advertisements) online; reduce the risk of children being subjected to harmful online interaction with others; restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's policy and procedures in relation to online safety can be found in Appendix 2 of this policy and in School's Online Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. These systems will be reviewed periodically.

Relationships and sex education ("RSE")

Relationships education is compulsory from September 2020, although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching relationships education.

Relationships education and/or RSE is discreetly taught and forms part of the School's PSHE programme and science teaching.

Looked after children/previously looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Josie Hodgson is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Private fostering

A private fostering arrangement occurs when a child under 16 years (under 18 if disabled) is cared for by someone other than a parent or close relative for 28 days or more. Parents and carers must inform the local authority at least six weeks before the arrangement begins. Failure to do so is a criminal offence.

Privately fostered children are potentially vulnerable and may be affected by abuse, neglect, trafficking or exploitation. School staff must notify the Designated Safeguarding Lead if they become aware of such arrangements. The DSL will confirm that the family has informed the local authority, and the school will report the arrangement to the local authority. On admission, the school will verify the relationship of adults to the child.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In

some cases, the School will request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the School site, will be supervised by a school employee. On attending the School, visiting speakers will be required to show original current identification documents, including a photograph, such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Early years provision safeguarding arrangements

Disqualification from working in childcare

Where staff (and other relevant individuals, such as peripatetic teachers and club supervisors) work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018. These checks are carried out pre-appointment and form part of the School's safer recruitment practices, further details of which can be found in the School's Safer Recruitment Policy. Ongoing suitability of staff will also be monitored throughout employment..

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date on which the disqualification declaration was obtained.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Staff ratios

The school will ensure that:

- Staff levels within the early years setting comply with the statutory minimum ratios set out in the EYFS Framework and can meet the needs of the children, provide suitable levels of supervision and keep them safe
- Parents are kept informed of staff members and numbers
- Children are kept within staff sight and hearing at all times
- Students or trainees will only count in staff ratios if they are appropriately qualified and have current paediatric first aid (PFA) certification, in line with the 2025 EYFS Framework

Use of mobile phones and cameras

To meet the requirements of the EYFS Framework, the School is required to have a policy with regard to the use of mobile phones and cameras. The statement below applies to the whole school:

- Mobile phones must not be visible and must be switched off at all times in all areas of the School where children may be present. This applies to all staff, parents, helpers, volunteers and Governors. Personal mobile phones, cameras or any other device with a camera facility, must NEVER be used in the EYFS classrooms or outdoor provision. Parents entering the EYFS must be reminded that their mobile phones should be out of sight and NOT used
- Mobile phones may only be used in the staffroom, in offices which are not frequented by children, or in areas of the school which are at that time not frequented by children and to which children have no access. Mobile phones may be used when there are no children on the premises
- There are some school mobile phones which the Head, Bursar and Admissions & Marketing Officer may use during the School day and others may be used by staff on school trips. Some staff working one-to-one with children may need to use a clearly marked mobile phone if supporting a pupil with diabetes, for example
- Some older pupils (Y6) who self-dismiss bring mobile phones to school; these phones must be handed into the School office at the start of each day and the pupils then collect them as they leave the School
- Only school cameras may be used for 'purposeful educational activity'. Personal devices are not to be used to take photos of pupils, either in school or during off-site activities. The use of cameras will be monitored using the School's IT & Acceptable Use and Online Safety Policies
- Storage, use and management of all data in all forms will comply with all aspects of data protection[2] and all safeguarding guidelines. Please refer also to the School's Online Safety Policy

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the Early Years setting is Josie Hodgson. The DSL (or a trained deputy) will always be available during EYFS opening hours to deal with safeguarding matters.

Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For

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[2] **"Data Protection Legislation"** means any data protection legislation from time to time in force in the UK including the Data Protection Act 2018 and the UK General Data Protection Regulation (or any successor legislation).

example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

Additional Safeguarding Requirements for the EYFS

Safer eating

- Children will be supervised appropriately at all mealtimes, adhering to the required ratios
- Staff will ensure that safe eating practices are followed to reduce risks such as choking

Toileting and intimate care

- The School is committed to maintaining children's dignity and privacy during toileting and nappy changing
- Procedures are in place to ensure that intimate care is carried out safely and respectfully, while upholding safeguarding standards at all times
- See the school's Intimate Care Policy for more detailed information

APPENDIX 1 - SIGNS AND TYPES OF ABUSE

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition by one label. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. **In all cases, if staff are unsure, they should always speak to the DSL (or deputy).**

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 (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs of physical abuse:

- Unexplained bruises or burns especially if they are recurrent
- Human bite marks, welts or bald spots
- Unexplained lacerations, fractures or abrasions
- Untreated injuries
- Self-destructive tendencies
- Improbable excuses given to explain injuries
- Aggressive or withdrawn
- Chronic runaway
- Fear of returning home
- Reluctant to have physical contact
- Clothing inappropriate to weather

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.

Signs of emotional abuse

- Sudden speech disorder
- Signs of mutilation
- Signs of solvent abuse
- Wetting and/or soiling
- Attention seeking behaviour
- Poor peer relationships
- Neurotic behaviour (rocking, twisting hair, thumb sucking)
- Reluctance for parent liaison
- Fear of new situations
- Chronic runaway
- Inappropriate emotional responses to painful situations

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

Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex (also known as child on child abuse). They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making

lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (and sharing sexual images and videos (both often referred to as the sharing of nudes/semi nudes or sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the *SVSH* advice.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however, occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as ' youth-produced/involved sexual imagery', 'indecent imagery', 'image-based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them, claiming to be from a peer
- Children and young people digitally manipulate an image of a young person into an existing nude online image
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS/UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents and how each should be handled.

Signs of sexual abuse

- Soreness or bleeding in the genital or anal areas or in the throat
- Torn, stained or bloody underclothes
- Chronic ailments such as stomach pains
- Difficulty in walking or sitting
- Frequent urinary or yeast infections
- STDs
- Unexplained pregnancies
- Chronically depressed
- Inappropriately seductive or precocious
- Sexually explicit language
- Low self-esteem, self-devaluation
- Recurring nightmares/fear of the dark
- Outbursts of anger
- Overly protective to siblings

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of neglect

- Tiredness

- Lack of social relationships
- Compulsive stealing, begging or scavenging
- Frequently late or absent
- Low self-esteem
- Sudden speech disorder
- Signs of mutilation
- Signs of solvent abuse
- Wetting and/or soiling
- Attention-seeking behaviour
- Poor peer relationships

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplained and/or persistent absences from education and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence/violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include unexplained and/or persistent absences from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, unexplained and/or persistent absences from education or permanent exclusion from school, experience of child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence/violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a

child into sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. 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.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited, e.g., they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The following CCE indicators can also be indicators of CSE, as can:

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

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc., without a plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Potential vulnerabilities may include:

- Prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment (domestic abuse, parental substance misuse, mental health issues or criminality)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Physical or learning disability
- Being in care (particularly residential care or interrupted care histories)
- Sexual identity

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts, money, or new possessions
- Children who associate with other young people involved in exploitation

- 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
- Children who regularly miss school or education, or do not take part in education

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same; however, staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help keep them in education. 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 sell drugs and move and store 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 increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE, as detailed above, may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Who go missing and are subsequently found in areas away from their home
- That have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or a hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern slavery: 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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to

refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2021)*".

Cybercrime: is a criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example, accessing a school's computer network to look for test paper answers or change grades awarded
- Denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources
- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above

Children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy) should consider referring into the Cyber Choices Programme. This is a nationwide Police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

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

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

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

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

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people, including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (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.

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It is illegal in the UK and typically takes place between birth and around 15 years old, with the majority of cases happening between the ages of 5 and 8. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-agency statutory guidance on FGM.

Risk factors for FGM can include:

- Low level of integration into UK society
- Mother or sister who has undergone FGM
- Girls who are withdrawn from PSHE lessons
- A visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

Symptoms/indications that FGM may have already taken place can include:

- Difficulty walking, sitting, or standing; looking uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Frequent urinary, menstrual, or stomach problems
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes such as withdrawal or depression on return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit due to embarrassment or fear
- Talking about pain or discomfort between her legs

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they discover (through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless there is a good reason not to, they should still discuss the case with the DSL and involve children's social care. Where a teacher suspects a pupil is at risk, but FGM has not yet occurred, or the pupil is over 18, staff should follow the School's safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

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). It is important to note that ANY form of marriage for someone under 18 is illegal under the Marriage and Civil Partnership (Minimum Age) Act 2022, even when violence, threats or another form of coercion are not used. Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Any concerns that students may be getting married should be referred to the DSL. School staff can also contact the Forced Marriage Unit if they need advice or information: **Contact: 020 7008 0151 or email fmu@fco.gov.uk.**

Radicalisation: radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

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 or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated Safeguarding Leads and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales.

Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider whether it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's condition without further exploration
- The potential for children with SEND or certain health conditions being disproportionally impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Where there are concerns about abuse involving a pupil with SEND, the DSL will liaise with the SENCO.

Lesbian, gay, bi or gender questioning ("LGBT"): a child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupil's individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded when children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

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, current or former intimate partners and family members. The definition captures a range of different abusive behaviours, including physical, sexual, emotional, psychological, and economic abuse, as well as 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), including if they are, or have been, married or civil partners, share parental responsibility for a child, are relatives, or have been in an intimate relationship.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can involve a single incident or a pattern of behaviour and may take place inside or outside of the home.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background. Children can be profoundly affected by witnessing domestic abuse and may experience emotional, psychological, and behavioural impacts, including blaming themselves or having to leave the family home.

All children can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse occurs between family members. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

The National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day, on 0808 2000 247.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. It does not replace statutory safeguarding procedures. Where appropriate, the police and/or school should make a referral to the local authority children's social care if they are concerned about a child's welfare. The School should act on information received through Operation Encompass according to its safeguarding policies.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Homelessness: being homeless, or at risk of homelessness, presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness, including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a

property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who go missing, or are persistently absent, from school: A child going missing or being persistently absent from School is a potential indicator of a range of safeguarding issues, including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour' based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the Children Missing or Absent from School Policy. All unexplained absences will be followed up in accordance with this Children Missing or Absent from School Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- Fulfil its duty to identify children of compulsory school age who are missing from education
- Follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation

Promoting school attendance: Schools should promote good attendance. Contact should be made with parents on the first day of an unauthorised absence, and explanations for absence should be followed up rigorously when the child returns to school. Any concerns regarding these explanations should be reported to the Senior Attendance Champion/DSL (depending on the nature of the explanation).

Requests for leave of absence should be very carefully considered by the Head and only granted in exceptional circumstances.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports the identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging, as well as where children are already known to the local authority children's social care and need a social worker.

See the School's Attendance Policy and Procedure for more information.

Further guidance is available in Camden's 'Children missing from education' policy and the Camden Safeguarding Children Partnership missing children protocol, available at: https://cscp.org.uk/resources/missing-children-from-home-and-care/

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.

As children get older and are granted more independence (for example, as they start walking to school on their own), it is important that they are given practical advice on how to keep themselves safe. Many schools provide outdoor safety lessons run by teachers or by local Police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

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 are two age appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes, including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2 – ONLINE SAFETY

The school's online safety policy is reflective of the requirements set out in KCSIE (2025) in regard to content, contact, conduct and commerce. The school's online safety policy is aligned with the school behaviour policy and reflects our approach to issues of online safety (including the sharing of nudes and semi-nudes, including consensual and non-consensual incidents) that empowers us to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The educational and social benefits for children in using the internet should be promoted, but this should be balanced against the need to safeguard children against the inherent risks from internet technology. Children also need to be taught how to stay safe from emerging technologies, including AI, apps and social media platforms.

Benefits and risks

Computing covers a wide range of activities, including access to information, electronic communications and social networking. As use of technology is now universal, children need to learn computing skills in order to prepare themselves for the working environment and it is important that the inherent risks are not used to reduce children's use of technology. Further, the educational advantages of computing need to be harnessed to enhance children's learning.

The risk associated with the use of technology by children can be grouped into 4 categories.

Content

The internet contains a vast store of information from all over the world, which is mainly aimed at an adult audience and may be unsuitable for children. There is a danger that children may be exposed to inappropriate images such as pornography, or information advocating violence, racism, suicide or extremist content, or illegal and anti-social behaviour that they are unable to evaluate in a critical manner. The definition of content risks has been updated to include misinformation, disinformation (including fake news), and conspiracy theories, which children may encounter online.

Contact

Chat rooms, gaming sites and other social networking sites can pose a real risk to children as users can take on an alias rather than their real names and can hide their true identity. The sites may be used by adults who pose as children in order to befriend and gain children's trust (known as "grooming") with a view to sexually abusing them.

Children may not be aware of the danger of publishing or disclosing personal information about themselves, such as contact details that allow them to be identified or located. They may also inadvertently put other children at risk by posting personal information and photographs without consent.

The internet may also be used as a way of bullying a child, known as online bullying including child-on-child abuse and online sexual harassment among children. Please see our Online Safety Policy for the School's proactive approach to this. It can be found on our website.

Commerce

Children are vulnerable to unregulated commercial activity on the internet that could have serious financial consequences, such as fraud or identity theft, for themselves and their parents. They may give out financial information, for example, their parents' credit card details, in response to offers for goods or services, without seeing the fraudulent intent. Contact via social networking sites can also be used to persuade children to reveal computer passwords or other information about the family for the purposes of fraud. Children may also be exposed to in-app purchases, subscription scams, and exploitation for financial gain via social media.

Culture

Children need to be taught to use the internet in a responsible way, as they may put themselves at risk by:

- Becoming involved in inappropriate, anti-social or illegal activities as a result of viewing unsuitable materials or contact with inappropriate people
- Using information from the internet in a way that breaches copyright laws
- Uploading personal information about themselves, including photographs, on social networking sites without realising they are publishing to a potentially global audience
- Online bullying
- Use of mobile devices to take and distribute inappropriate images of the young person (sexting) that cannot be removed from the internet and can be forwarded on to a much wider audience than the child intended
- Engaging in digital sexual harassment or coercion, which may impact mental health and wellbeing

Children may also be adversely affected by obsessive use of the internet that may have a negative impact on their health, social and emotional development and their educational attainment. They may visit sites that advocate extreme and dangerous behaviour, such as self-harm or suicide or violent extremism, and children may be at a high degree of risk from such sites. All children may become desensitised to pornography, violence, sex and drug use or self-harm by regularly viewing these online.

The DSL acts as the school's Online Safety Coordinator and takes lead responsibility for online safety and understands the filtering and monitoring systems and processes in place, including risks from emerging technologies such as AI.

Whole school approach

Computing is now a key part of the school curriculum as well as a key element of modern communications technology that is widely used, and one of the key aims of computing is to ensure

that pupils are aware of online safety messages. This is part of the school's responsibility to safeguard and promote the welfare of pupils, as well as the duty of care to children and their parents to provide a safe learning environment.

- Staff are aware that online safety is an element of many safeguarding issues, as technology can be used to aid many forms of abuse and exploitation, for example, sexual harassment and cyberbullying, and should be aware of the use of technology in child-on-child abuse
- The school ensures that consistent messages are given to staff and pupils and that everyone understands the Online Safety Policy
- Staff are reminded to be aware of the importance of ensuring their own use of technology complies with school policies, particularly in terms of contact with pupils, and schools must ensure there are clear policies available to staff on expectations for online behaviour
- The Behaviour Policy sets out expected standards for pupils' online behaviour and expected sanctions for breaches
- School's online safety procedures are reviewed regularly and staff training refreshed in order to ensure that they remain relevant in the face of changing technologies. This training includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, safe and responsible use of generative AI
- The School uses the Smoothwall firewall, which monitors online activity and alerts the IT Manager and DSL, who is also the Online Safety Co-ordinator, to concerns
- A culture of safe practice underpinned by a strong framework of online safety policy that ensures everyone is aware of expected standards of online behaviour
- Children are taught to keep themselves and others safe online and use technology responsibly; this should be achieved by working in partnership with parents and carers and raising awareness of the potential risks of internet use, including AI, apps, and emerging platforms

Filtering and monitoring

- Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made
- Monitoring can include: physical monitoring, live software monitoring, monitoring user logs, and monitoring individual devices
- We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures
- Each year, the Designated Safeguarding Lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties are understood by all staff and reports are effectively managed. This review now includes guidance against the DfE's filtering and monitoring standards, consideration of emerging technologies, including AI, and uses the 'plan technology for your school' service for self-assessment and personalised recommendations
- All staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns

- All staff have taken part in cybersecurity training. Staff are also trained on safe use of generative AI, including how filtering and monitoring requirements apply to AI in education, in line with the DfE's Generative AI: product safety expectations guidance

Parents and carers are regularly informed and engaged in online safety education. All online safety incidents, including those involving child-on-child abuse, sexual harassment, or AI misuse, are recorded and escalated according to the school's safeguarding procedures.

For more detailed information, see the School's Online Safety Policy.

APPENDIX 3 - ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD FLOWCHART
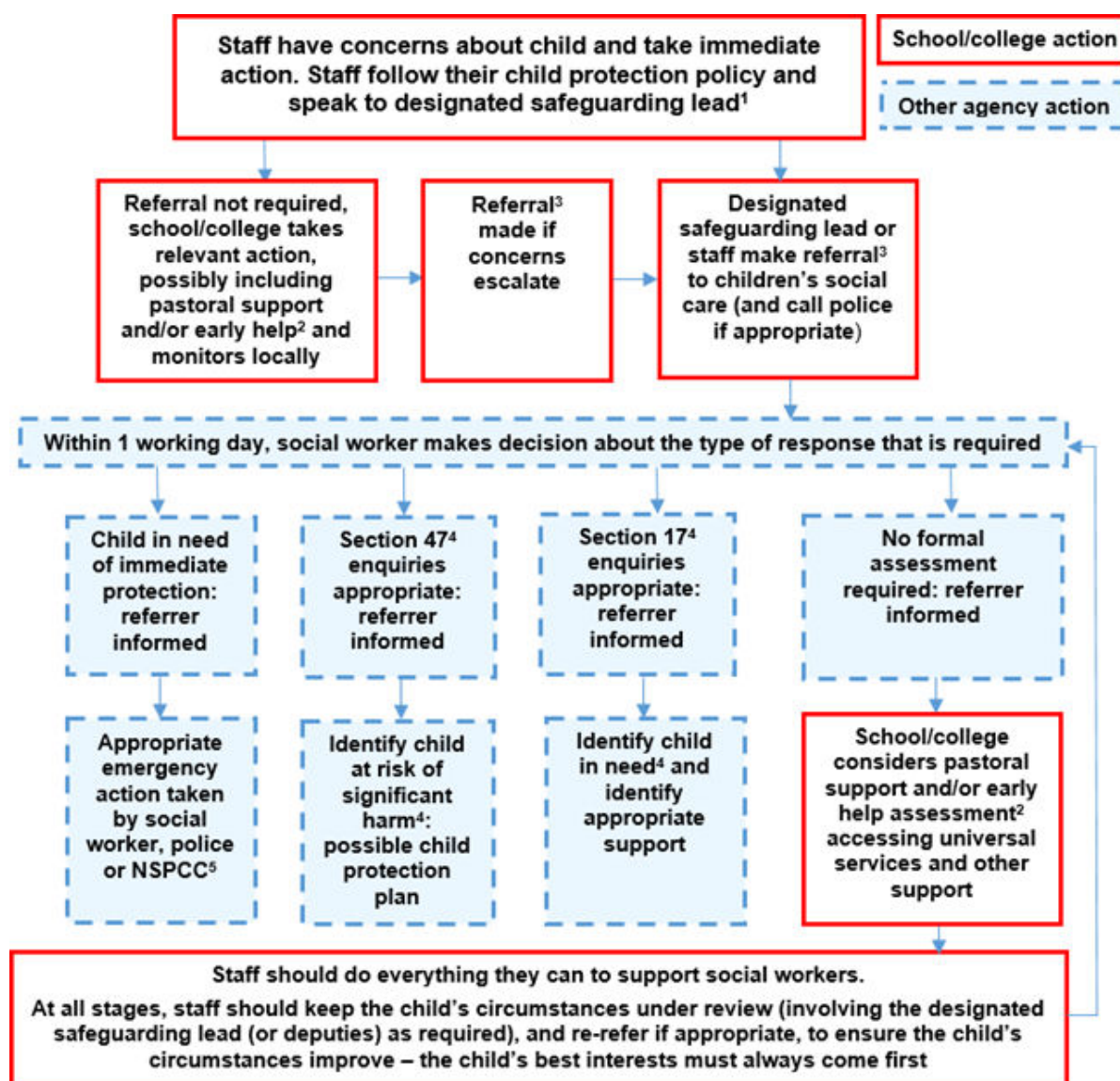
1. In cases which also involve a concern or an allegation of abuse against a staff member, please see what staff should do if they have safeguarding concerns about another staff member in the attached Policy;

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. 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)

APPENDIX 4 - LEGAL DUTIES

Human Rights Act 1998

The Human Rights Act 1998 sets out an individual's rights and freedoms under the European Convention and public organisations such as schools must ensure that these rights and freedoms are protected whenever decisions are being made about an individual pupil. The relevant rights are:

- Right to an education (Article 2)
- Right to freedom from inhuman and degrading treatment (Article 3); this is an absolute right that cannot be limited in any way
- Right to respect for privacy and family life (Article 8); this is a qualified right which must be balanced against the rights of others

Any form of (sexual) harassment, violence or abuse may be a breach of these rights.

Equality Act 2010

The School understands and recognises its obligations under the Equality Act and that the School must not discriminate against pupils because of a protected characteristic, including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

Schools must be able to demonstrate that they have taken proportionate positive action and/or made reasonable adjustments in order to deal with the disadvantages faced by these groups. For more guidance, see:

- Equality Act 2010: advice for schools - GOV.UK (www.gov.uk)

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. We ensure that all children have the same protection, regardless of any barriers they may face.

Equality duty

Under the Equality Act, public organisations such as schools have a duty to eliminate unlawful discrimination, harassment and victimisation and ensure equality of opportunity for all pupils. When making decisions, schools must be aware of this duty and ensure that decisions do not unlawfully discriminate against groups of pupils who are protected under the Act. For example, schools should be aware that some groups of pupils, for example, girls or LGBTQ pupils, may be more vulnerable to sexual violence or harassment.

For more information, please see:

- Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission (equalityhumanrights.com)

APPENDIX 5 - SCHOOLS SAFEGUARDING CHECKLIST

To be used by the DSL, Head and Governors to carry out an assessment of the school's safeguarding framework.

Name of school:

Address:

Name of Head:

Contact details:

Date of safeguarding assessment:

Requirement	Yes	No	Comments/action
Leadership and the safeguarding and child protection framework			
The school has comprehensive safeguarding policies covering early help and child protection, behaviour management and a staff conduct policy covering use of technology, relationships with pupils, communications and use of social media			
The school has agreed procedures for dealing with incidents of sexual violence and sexual harassment that are linked to the school's behaviour and bullying policies			
There are agreed local procedures in place for making referrals to CSSW where there are concerns about the safety and welfare of a child			
There is a designated governor with responsibility for safeguarding and child protection			

The school and governing body is aware of duties under the Human Rights Act 1998 and the Equality Act 2010			
A senior member of the leadership team has been appointed as the Designated Safeguarding Lead and a nominated deputy to carry out the role in their absence and they have the time and resources allocated to carry out their responsibilities			
The safeguarding lead and their deputy have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 2 years.			
Arrangements are in place to ensure staff can liaise with the safeguarding lead or their deputy at all times during school hours			
The school promotes a multi-agency approach to safeguarding and child protection in line with *Working together* and staff are able to attend child protection conferences and other multi-agency meetings as appropriate			
The school is represented on the Camden Safeguarding Children Partnership			
The school will take relevant action on receipt of all Police notifications of children who have been involved in domestic abuse incidents via Operation Encompass			
The school has taken steps to implement Operation Encompass and have a process for dealing with Police notifications of domestic abuse incidents			
The curriculum offers opportunities for pupils to learn how to keep themselves safe, including online, and offers pupils guidance on healthy relationships in line with the new statutory duty to provide relationships and sex education.			

The school promotes positive behaviour and this is reflected in behaviour management strategies used; reasonable force and restraint is used only in line with legislation; use of any behaviour management strategy is tailored to the needs of the pupil and carefully monitored for effectiveness; efforts are made to reduce the use of physical intervention and restraint for vulnerable children.			
The school has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting, upskirting and inappropriate language			
The school has effective policies for dealing with sexual violence and sexual harassment between pupils			
There is a policy around dealing with allegations against staff and all staff are aware of the policy and know what action to take if they have concerns about another member of staff			
The school has a policy of openness and challenge and staff and pupils feel safe to raise concerns; there is a whistleblowing policy in place and all staff and pupils know who to contact if they are concerned that safeguarding issues are not being adequately dealt with by the school			
The school have taken steps to implement the Prevent duty and staff are aware of how to make appropriate referrals to Channel Panel			
The school has an anti-bullying policy for pupils dealing with child on child abuse and all staff are aware of what action to take under this policy			
The school seeks the views of pupils and parents with regard to safeguarding issues and all safeguarding and child protection policies are available on the school website;			

Staff knowledge and safeguarding practice			
All staff are inducted in safeguarding arrangements in the school and have received and read all relevant policies			
Staff are aware of the safeguarding culture of the school and their role in challenging inappropriate behaviour and language and being vigilant to child on child abuse			
All staff and Governors have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 2 years as a minimum			
All staff receive regular updates to safeguarding and child protection legislation via the Designated Safeguarding Lead as required			
All staff are able to identify those children who may benefit from early help and are able to provide support within the school or make appropriate referrals to Camden's Early help service			
All staff are able to recognise the indicators of abuse and harm, can identify children who may be at risk of harm and those who may be vulnerable to harm including LGBT children, those with social workers, those with SEND			
All staff know what action to take to refer children appropriately to CSSW where there are concerns and make timely referrals and follow up referrals where it is thought the child's situation is not improving			
All staff are aware of their legal duty under the mandatory reporting rules for FGM and can make appropriate notifications to the Police and CSSW in known cases of FGM			

All staff are aware of extra-familial harm and the indicators that a pupil may be at risk from harm within the community, particularly through criminal and sexual exploitation, and know what action to take to refer the pupil on for safeguarding			
All staff are aware of what actions to take when a child goes missing from education or does not attend and that missing episodes are monitored; all staff are aware of the link between going missing and safeguarding issues such as sexual exploitation, criminal behaviour, substance misuse and trafficking; there are procedures in place to notify Camden where a child is removed from the school roll in line with the local *Children missing from school* policy			
All staff are aware of how harm, abuse, neglect and trauma can impact on pupil's mental wellbeing and can recognise those pupils who need help with their mental health; all staff know what actions to take to signpost or refer pupils who need a mental health service.			
All staff are able to share information lawfully and appropriately and work jointly with partner agencies; parents are informed of concerns and actions taken unless this puts the pupil at further risk			
Records of concerns and referrals are up to date and timely and kept securely			
All staff receive regular supervision that enables them to raise safeguarding issues			
Risk assessments are routinely carried out to ensure the health and safety of pupils on site, on school trips and during work experience			
Pupils feel safe and are aware of how to raise concerns and complaints with a trusted adult			
Safer recruitment			
The school has a safer recruitment procedure that is in line with statutory requirements			

The school has a single central record providing details of when and by whom the following checks on candidates were taken out: • Identity checks • DBS/barred list checks • Prohibition from teaching/section 128 checks • Appropriate checks with oversees organisations where the candidate is from abroad • Checks to establish right to work in the UK • Professional qualifications check • Checks on individual's social media accounts and an online search			
The school has a clear system in place in line with statutory requirements for volunteers or contractors coming into the school. Enhanced DBS checks are taken out on all staff members, volunteers and Governors; barred list checks are also taken out on staff, volunteers and Governors who are involved in regulated activity			
The head teacher or other member of the senior leadership team decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out and children are not left unsupervised with any individual who has not undergone a DBS check			
The school seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; all agency and supply staff are required to present proof of identity prior to beginning work			
A member of the governing board or senior leadership team involved in interviewing has completed an accredited safer recruitment training course			
Dealing with allegations against staff			

There is a named staff member with responsibility for liaising with the Police and LADO for all staff subject to allegations, including supply staff			
Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations			
The School has a system in place to deal with low-level concerns about staff that do not reach the threshold to be dealt with under the allegations procedures and how to seek advice from the LADO where it is not clear if the threshold has been reached			