



Child Protection & Safeguarding Policy

Status: Statutory

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Committee Responsible: FGB

Policies are approved and ratified by the Full Governing Body and the approval of policies are recorded within the minutes of the meetings.

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Key contacts

School

Headteacher: Jane Carrington

Designated Safeguarding Lead(s):

Jane Carrington (Headteacher)

Deputy Designated Safeguarding Lead : Taljeet Sidhu (Deputy Headteacher), Jenna Foley (SENCo) and Alice Hind.

Designated LAC teacher: Alice Hind

Nominated governor for child protection and safeguarding: Judith Richardson

Chair of Governors Jim Glen

Contact details for all the above: 020 7504 0537 or admin@stpeaton.org.uk

National contacts

NSPCC 0808 800 5000 **Childline** 0800 111

Police 999 Emergency or immediate danger to a child 101 Non-immediate concerns

School police link PCSO Zack Slaney 7320CW | Dedicated Ward Officer | Knightsbridge & Belgravia SNT Service Central West BCU (CW) p: 0207 321 9292 m: 07769164785:

DfE Extremism helpline 020 7340 7264

Anti-terrorist hotline on 0800 789 321 (for emergencies) or dial 999. Local Authority contacts

Duty Child Protection Advisor/LADO.

General Contact details:

Email LADO referrals to: lado@westminster.gov.uk

Tel: 020 7641 7668

Multi Agency Safeguarding Hub (MASH). Operates from 09:00 - 17:00 Monday to Friday
Made up of staff from Children's Social Care, Police and Health from across the 3 boroughs. An Education Worker coordinates MASH links with schools.

MASH Team Manager: Catherine Hoy

Contact details: choy@westminster.gov.uk

Tel: 020 7641 3991

Address: Frampton Street, London NW8 8LF

Westminster Access to Children Services Team:

Tel: 020 7641 4000 (9am–5pm weekdays)

Emergency Duty Team on 020 7641 2388 (outside above hours)

Email: accesstochildrenservices@westminster.gov.uk

FGM Tri-borough Senior Practitioner

Name: Rochelle-Ann Naidoo

Tel: 020 7641 1610

Email: rnaidoo@westminster.gov.uk

PREVENT Prevent Programme Manager

Name: Kiran Malik

Tel: 020 7641 5071

Email: kmalik@westminster.gov.uk

Channel helpline: to raise concerns about extremism with respect to a pupil (020 7340 7264)

EARLY HELP TEAM (Family Information Service) (FIS):

Email: fis2@lbhf.gov.uk

Tel: 0845 313 3933

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy sets out how St Peter's 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. It is based on the Department for Education's statutory guidance [Keeping Children Safe in Education](#) 2020, [Working Together to Safeguard Children 2018](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#). Additional linked legislation can be found in Appendix 5

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's 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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4. Equality statement

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

We give special consideration to children who:

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

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Roles and responsibilities

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

5.1 The Governing Board

The governing body will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- Safeguarding policies and procedures are in place and are regularly monitored, reviewed and updated where necessary. This policy will be reviewed annually in line with legislation.
- A staff code of conduct which include staff/pupil relationships and communications and staff use of social media
- A senior member of staff is appointed as the DSL with responsibility for carrying out the statutory duties as set out in this policy, is given sufficient time and resources to carry out their responsibilities and a DSL is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children (LAC) and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies, including Keeping Children safe in Education Part 1 and Annex A, and the staff code of conduct policy
- A procedure for responding to incidents. where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- There is a nominated governor for child protection and safeguarding: Our nominated governor is **Judith Richardson**.
- There is a nominated governor who links with the LADO in the event of an allegation against the headteacher. Our nominated governor is Jim Glen
- The school follows effective safer recruitment practices
- Staff and DSLs receive regular safeguarding and child protection training
- All governors will read Keeping Children Safe in Education and pay particular attention to Part 2. The management of safeguarding

5.2 All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (Staff Handbook), behaviour policy, the St Peter's way, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

5.2 The designated safeguarding lead (DSL)

Our designated safeguarding leads are Jane Carrington and Taljeet Sidhu

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection within the school and to be available during school hours, including before and after school when clubs are operating, for staff to discuss safeguarding concerns.

- The school has appointed a member of the senior leadership team (Jane Carrington-Head Teacher and Taljeet Sidhu-Deputy Head Teacher) as the DSL. The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in school. The school has also identified additional staff to deputise for when the DSL is not available. Any reference to the DSL in this policy refers to the whole DSL team including deputies.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by Westminster Safeguarding Children Board in line with guidance set out in Competence Still Matters, 2014. The DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods e.g. e-Bulletins, the Safeguarding Newsletter, conferences, local meetings ie DSL Forum, other training etc. at regular intervals, at least annually, to keep up with any developments relevant to their role.
- During term time the DSL (or a deputy) will always be available (during normal school hours) for staff in school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in *exceptional circumstances* availability via phone and or video call or other such mediums is acceptable.
- The DSL is the central contact point for all staff to discuss any safeguarding concerns and has lead responsibility for managing child protection referrals, safeguarding training and raising awareness of all child protection policies and procedures. They will ensure that everyone in school (including temporary staff, volunteers and contractors) is aware of this policy and our procedures and that they are followed at all times.
- The DSL maintains a confidential recording system for all safeguarding and child protection concerns and works closely with the Designated Teacher for Looked After Children and the Head of the Virtual School for all children who are looked after or have previously been looked after.
- The DSL ensures that the school provides reports/updates and is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences and Team around the Child Meetings)

Additional responsibilities for the DSL:

- Responsibility for online safety as well as safeguarding and child protection
- Working with mental health leads where safeguarding is linked to mental health
- Promoting supportive engagement with parents and carers
- Promoting educational outcomes of children in need by knowing and helping to address issues they have/are experiencing by:
- Ensuring the school knows which children need a social worker, understand their academic progress and attainment and maintaining a culture of high aspirations
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have/had a social worker reach their potential
- Recognising the lasting impact on educational outcomes
- To work with the headteacher and 'relevant strategic leads' on information sharing:
- Understanding the importance of sharing information with other schools/colleges on transfers including in-year transfers and between primary and secondary education
- Ensuring information in child protection files is kept confidential and stored securely

- Ensuring that the child protection file is transferred to a new school/college within 5 days for an in-year transfer or within first 5 days of start of a new term.

Training, knowledge and skills new expectations they have a good understanding of:

- How to identify, understand and respond to specific needs that can increase the vulnerability of children
- Specific harms that could put children at risk
- The important role they play in providing information and support to CSC to safeguard and promote their welfare
- The lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, and what is needed to respond to this
- The difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication
- Children in need (disabled children, those with relevant health needs and young carers) who have specific need to be alert to

5.3 The headteacher

- The headteacher is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL team have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Ensure all concerns about poor or unsafe practice regarding children, will be addressed sensitively and in a timely manner in accordance with the school’s whistle blowing policy.
- Ensure there are robust systems in place to cover for the DSL’s planned and unplanned absences from the school, including having Deputy DSLs who have the role added to their job descriptions.

6. Confidentiality

This policy recognises and ensures confidentiality and data protection with respect to safeguarding and is linked to the following school policies; Data Protection, Freedom of Information, Code of Conduct, Whistleblowing

The school notes that:

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- All staff in school, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children’s Services: Safeguarding and o Specialist Services and the Police).
- Timely information sharing is essential to effective safeguarding
- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests

- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

Speak to the DSL immediately and the DDSL if DSL is unavailable. The DSL will make a referral to children's social care and/or the police **immediately**

If, in the unlikely event that neither the DSL or DDSL are available quickly, call the police **immediately** and then share any action you have taken with the DSL. Make sure you record this on CPOMS.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Anyone can make a referral.

Tell the DSL as soon as possible if you make a referral directly because it has not been possible to go directly to the DSL. Going immediately to the DSL is the preferred option as she best placed to contact Social Care.

7.2 If you have concerns about a child

Speak to the DSL as soon as possible. If the DSL is not available, speak to the DDSL. Record your concerns on CPOMS

The DSL will feedback to you on action taken so that you know the concern has been acknowledged and dealt with.

7.3 Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

7.4 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should: Listen to and believe them.

- Allow them time to talk freely
- Not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child’s own words onto CPOMS. Stick to the facts, and do not put your own judgement on it. Write your conversation on CPOMS (see below) but if this is not possible write it down on paper with Date and Time and take it directly to the DSL. Later on you need to write this up on CPOMS. (You might be able to do this with the DSL as you talk through the conversation with her.)
- Sign and date the write-up and pass it on to the DSL **immediately**. (Either paper or CPOMS, either way alert the DSL)
- In the highly unlikely event of the DSL or DDSL not being available, and IF the child is suffering, likely to suffer from harm or in immediate danger Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

CPOMS is the school system where all staff can share any concerns about pupil welfare and safeguarding. All concerns **MUST** be written into the system so that DSLs can monitor concerns and act swiftly on them where needed. The DSLs have a higher level of access on this system so can look at pupils’ individual profiles and action and responses to concerns raised.

7.5 Early Help

Westminster Early Help work with families who have children 0-19yrs, where there are indications of emerging difficulties or additional needs to overcome issues and build on the strengths already present in the family. If you have shared a concern with the DSL, the DSL may liaise with other agencies and set up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment,

The DSL may consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.6 FGM

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

If you are a teacher, and discover that FGM has taken place, you have a legal duty to report this to the Police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. You should if possible first discuss the case with the DSL who will involve Children’s Social Care as appropriate.

If you are a member of the support staff (non-teaching) who discovers that an act of FGM appears to have been carried out on a **pupil under 18** you must speak to the DSL.

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Role	FGM has taken place	You suspect a pupil is at risk from FGM
Teacher	report this to the police and speak to the DSL (preferably first) write up event on CPOMS <i>See Annex B of KCSIE, 2021 for further details. Summary of Mandatory FGM reporting duty</i>	Speak to the DSL promptly write this on CPOMS

Non- teaching staff member	Speak to DSL Write up event on CPOMS if possible	Speak to the DSL promptly write this on CPOMS if possible
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Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4. Contact information and helpline information is on page 1 of this policy

7.7 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the DDSL or a member of the senior leadership team and/or seek advice from local authority children’s social care.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team. Contact information and helpline information is on page 1 of this policy

7.8 Concerns about a staff member, volunteer or agency staff

If you have concerns about a member of staff, supply teacher or volunteer, or an allegation is made about a member of staff, supply teacher or volunteer posing a risk of harm to children, speak to the headteacher.

If the concerns/allegations are about the headteacher, speak to the chair of governors.

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

7.9 Allegations of abuse made against other pupils/Peer on peer abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent Ensuring pupils know they can talk to staff confidentially.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately. You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL. You should then report this asap to the DSL and write up the incident while fresh in your mind (on CPOMS or on paper if CPOMS is not possible).

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

7.10 Children Missing from Education

- Our school recognises that all children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We are aware that a child going missing from education is a potential indicator of abuse or neglect.

Our school has a procedure in place for responding to unauthorised absence and responding to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. This may include liaising with Children’s Social Care and/or the police. For further information, please access the school’s policy and procedures regarding attendance and inclusion.

7.11 Child Criminal Exploitation (CCE)

- St Peter’s Eaton Square recognises the impact of gangs, county lines, violent crime and exploitation on children and young people. We recognise that our initial response is important and so staff will take any allegation seriously and work in ways that support children and keep them safe.

Staff are aware that CCE can include the following:

- Vehicle crime and threatening/committing serious violence
- Children may become trapped due to threats of violence to them and families
- Children may be coerced or entrapped into debt/carrying weapons
- Children may carry weapons for protection
- Children involved in CCE need to be treated as victims themselves even though they may be committing crimes (particularly older children)
- Girls are at risk of CCE too, even though experiences may be different

7.12 County Lines

Some indicators of county lines are:

- go missing and are subsequently found in areas away from their home;
- 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 hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Staff are aware of the different forms of extra familial harm including sexual exploitation, criminal exploitation and serious youth violence. Staff are also aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues that put children in danger, such as

- drug taking
- alcohol abuse
- deliberately missing education
- sexting

7.13 Child Sexual Exploitation (CSE)

- All staff at St Peter's Eaton Square have been made aware of the revised definition of CSE, as issued by the Department for Education in February 2017 which is

"Child Sexual Exploitation is a form of child sexual abuse.

It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".

- We understand that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.
- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. **This includes 16 and 17 year olds who can legally consent to have sex.** Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- Further information about CSE including definitions and indicators is included in Annex B of KCSIE 2021.

Both Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group:

- takes advantage of an imbalance in power (including gender, sexual identity, cognitive ability, physical strength, status and access to economics or other resources) to coerce
- takes advantage to manipulate or deceive a child into sexual or criminal activity
- uses abuse in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or:

- a series of incidents over time
- from opportunistic to complex organised abuse

The abuse:

- can involve force and/or
- enticement-based methods of compliance and
- may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B of KCSIE 2021.

7.14 Domestic Abuse

The current definition of Domestic Abuse from the Domestic Abuse Act 2021 is:

The behaviour of a person towards another person is “domestic abuse” if—

- They are each aged 16 or over and are personally connected to each other ((ie a) they are, or have been, married to each other; (b)they are, or have been, civil partners of each other; (c)they have agreed to marry one another (whether or not the agreement has been terminated); (d)they have entered into a civil partnership agreement (whether or not the agreement has been terminated); (e)they are, or have been, in an intimate personal relationship with each other; (f)they each have, or there has been a time when they each have had, a parental relationship in relation to the same child; (g)they are relatives.
- the behaviour is abusive.

(3)Behaviour is “abusive” if it consists of any of the following—

- a) physical or sexual abuse;
- b) violent or threatening behaviour;
- c) controlling or coercive behaviour;
- d) economic abuse;
- e) psychological, emotional or other abuse;

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

(4)“Economic abuse” means any behaviour that has a substantial adverse effect on one party’s ability to—

- acquire, use or maintain money or other property, or
- obtain goods or services.

(5) For the purposes of this Act A's behaviour may be behaviour "towards" B despite the fact that it consists of conduct directed at another person (for example, B's child).

- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

8. Curriculum and Staying Safe

- Our school recognises our essential role in helping children through PSHE to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our school will ensure that children are taught about safeguarding, including online safety as we consider that this is part of providing a broad and balanced curriculum. This may include covering relevant issues in Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which has been compulsory since September 2020.
- **Relationships and Sex Education and Health Education:**
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- **Education for a Connected World framework:**
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- St Peter's will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.
- Systems have been established to support the empowerment of children to talk to a range of staff so that pupils at St Peter's Eaton Square will be listened to, heard and their concerns taken seriously and acted upon as appropriate. Specific systems outside of expected day to day classroom interaction and support will include:
 - Student Council
 - Eco- committee
 - Prayer boxes
 - Buddy classes
 - PSHE events- Jigsaw
 - Zones of regulation
 - St Vincent's family project
 - The Bessborough
 - Regular feedback questionnaires with groups of children
 - Behaviour Policy
 - Anti-Bullying Policy
 - School assemblies

9. Pupils with special educational needs and disabilities

- St Peter's Eaton Square acknowledges that children with special educational needs and disabilities and/or certain health conditions can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.
- Our staff are aware of the additional barriers which exist recognising abuse and neglect in this group of children, these include:
 - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect, without further exploration;
- Speech, language and communication needs which may make it difficult to tell others what is happening and managing or reporting these challenges.

To address these additional challenges, staff will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

10. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Pupils in Year 6 may have mobile phones but these must be switched off and left in the school office during the school day.

In school pupils are not permitted to wear Smart watches with photographic and telephone capabilities.

11. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

11.2 Other complaints

The school has a robust complaints procedure, which is available either on the website or in hard copy from the school office.

As an Early years provider we take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.74).

11.3 Whistle-blowing

The school has a robust complaints procedure, which is available either on the website or in hard copy from the school office.

As an Early years provider we take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

12. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding record-keeping is through the secure CPOMS program. We follow our record transfer and retention protocols.

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff
 - All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover in line with KCSIE, 2021. These will be given to the new DSL and a receipt of delivery will be obtained. The DSL should also transfer any information relating to the Channel Programme.

13. Training

13.1 Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of part one of KCSIE, 2021 which provides an overview of safeguarding duties and responsibilities. School leaders will read the entire document. All members of staff who work directly with children should at least read Part 1 and must sign to confirm that they have read and understood.
- There is a condensed version of Part 1 in Annex A of KCSIE 2021 that is given to staff who do not directly work with children in these roles:
- All information is kept on the single central record.

All staff working directly with children:

- Are expected to read at least Part 1 of KCSIE
- Should reassure victims of abuse that they are being taken seriously, they will be supported and kept safe
- Should not give children the impression they are creating a problem or made to feel ashamed for making a report
- Should know the indicators of abuse and neglect for specific safeguarding issues eg child criminal exploitation and child sexual exploitation
- Should be aware that multiple safeguarding issues often overlap with one another
- Should be aware of the risk factors that increase the likelihood of involvement in serious violence
- The DSL will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in the school's internal safeguarding procedures and communication lines. As a minimum, this will include
 - the child protection policy
 - the behaviour policy
 - the staff behaviour policy (sometimes called a code of conduct)
 - the safeguarding response to children who go missing from education; and
 - the role of the DSL (including the identity of the DSL and any deputies). **(A summary information sheet is available to be given to staff and volunteers to support this process.)**
- All staff members (including temporary staff) will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:
 - Recognise potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
 - Respond appropriately to safeguarding issues and take action in line with this policy
 - Record concerns in line with the school policies
 - Refer concerns to the DSL and be able to seek support external to the school if required
- All staff members (including temporary staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to drug taking, alcohol abuse, truanting and peer on peer abuse such as bullying and sexting can put

children in danger. The staff training will also include school responsibilities, the school child protection procedures, online safety, safe working practice and external reporting mechanisms.

- All staff members (including temporary staff) will receive regular safeguarding and child protection updates (e.g. e-Bulletins, staff meetings or briefings, other training etc.), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary staff) will also be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.
- The school recognises the expertise which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. All staff are therefore able to contribute to and shape safeguarding arrangements and the safeguarding policy. We do this by discussing the policy during staff meetings and staff briefings. Other safeguarding policies, for example the school Code of Conduct and Acceptable Use Policy, are also sent to staff for their feedback before ratification by the Governing Body.
- The DSL will maintain an up to date register of who has received safeguarding and child protection training, including Prevent and will provide an annual update to the Governing Body as part of the annual safeguarding report.
- Although the school has a nominated safeguarding lead for the governing body (Judith Richardson), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

13.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

13.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

13.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

13.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

14. Health and safety and suitability of premises

The school will ensure that all indoor and outdoor spaces and facilities are safe and fit for purpose and comply with school policies and standards for site safety and health and safety. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents' details, and contact numbers for emergencies are kept up to date (a minimum of 2 contacts per pupils if at all possible)

The school will ensure that pupils are released to the care of their parent or other responsible adult with the parent's consent at the end of the day, and has robust procedures to ensure pupils walking to and from school on their own are safe. In addition, the school has procedures for dealing with uncollected children.

15. Safer recruitment and DBS checks – policy and procedures

As part of the school's safeguarding culture, the school has robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school.

Any members of staff who are involved in the recruitment and selection process are appropriately trained in safer recruitment, covering the topics contained in Part 3 of KCSIE 2021 at a minimum. In accordance with The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 we will ensure that at least one of the persons who conducts an interview has completed safer recruitment training recommended by the Westminster Safeguarding Children Partnership and should be repeated every three years.

The school will ensure that the safer recruitment process covers paragraphs 192 – 316 of KCSIE 2021 in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

- The Governing Body will ensure that the Senior Leadership Team and at least one member of the Governing Body complete accredited Safer Recruitment Training in line with statutory requirements.
- St Peter's Eaton Square is responsible for ensuring that the school maintains an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply staff), volunteers and governors and meets statutory requirements.
- We expect all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent. We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The

references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children. We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare

Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity. All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

16. Monitoring arrangements

- All school staff (including temporary staff and volunteers) will have access to a copy of this policy and will have the opportunity to consider and discuss the contents prior to approval of the Governing Body being formally sought. The policy will also be available to parents/carers.
 - This policy has been written in August/September 2021 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare which comes into force on 1st September 2021.
 - The policy forms part of our school development plan and will be reviewed annually.
 - All staff should have access to this policy and sign to the effect that they have read and understood its contents.
- The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid

- Curriculum
 - Privacy notices
 - Whistle blowing
 - Internet acceptable use
 - Anti-bullying
 - Medicines
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The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- 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. The sexual abuse of children by other children (also known as peer on peer abuse) is a specific safeguarding issue in education (see KCSIE 2021 paragraph 29).

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. We will take seriously any allegation received and follow the guidance in Part 4, Section 1 of KCSIE 2021.

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

What school or staff should do if they have concerns about safeguarding practices within the school. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting's safeguarding arrangements. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the school or 's senior leadership team.

If staff members have concerns about another staff member then this should be referred to the Headteacher or Principal. Where there are concerns about the Head Teacher or Principal, this should be referred to the Chair or Vice Chair of Governors.

Chair:- Jim Glen jim.glen@yahoo.com **Vice Chair:-** Edward Gush tedg@gastrotraveller.com

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children, one example being domestic abuse.)

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

- Basic enquiries to establish facts before contacting LADO
- **A case manager (usually headteacher)** to lead investigation
- **The case manager** to discuss any concerns about the welfare of other children in the community of member of staff's family with DSL and make risk assessment
- DSL may then make a referral to children's social care

Where a member of staff has acted in a way outside of school that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:
 - this should be immediately referred to the headteacher;
 - where there are concerns/allegations about the headteacher, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the LADO..

- Where there is an allegation against an agency or supply member of staff, the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They will be advised to contact their trade union representative if they have one, or a colleague for support.

(b) Low Level Concerns

- Low level concerns (including allegations) are those that do not meet the harm threshold set out above. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken. St Peter's will manage and record such concerns and take appropriate action to safeguard children.
- St Peter's, as part of our whole school approach to safeguarding, promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one KCSIE 2021) are shared responsibly and with the right person, recorded and dealt with appropriately. This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.
- A low level concern means that the behaviour towards a child does not meet the threshold set out at Section 22(a) above (paragraph 338 of KCSIE 2021) A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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.
- Examples of such behaviour could include, but are not limited to:
 - being over friendly with children;
 - having favourites;
 - taking photographs of children on their mobile phone;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
 - using inappropriate sexualised, intimidating or offensive language.
- St Peter's believes it is crucial that any such concerns, including those which do not meet the allegation/harm threshold at 22(a) above, are shared responsibly and with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.

(c) What to do if you have a low-level concern

- Low-level concerns about a member of staff should be reported to the DSL. Where a low-level concern is raised about the DSL, it should be shared with the headteacher.
- The school encourages staff to feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy (as per paras 419 and 421 KCSIE 2021), and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

(d) Recording low-level concerns

- All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (as per paragraph 109 KCSIE 2021).
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will either implement disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves the employment of the school, unless there is an ongoing investigation taking place.

Contact details for the Tri-Borough Local Authority Designated Officer (LADO) for referral and management of allegations against staff: LADO@westminster.gov.uk 020 7641 7668

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Head Teacher/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer:

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay. If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.

The Head Teacher should, as soon as possible, following briefing from the Local Authority Designated Officer inform the subject of the allegation.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether

alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted 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), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching. **Individuals**

returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality and Information Sharing

- St Peter's Eaton Square recognises that all matters relating to safeguarding and child protection are confidential. The Headteacher or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.
- All members of staff are aware that whilst they have duties to keep any information about children, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in Appendix 3.

Our school has due regard to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we will withhold providing the data in compliance with our obligations under the Data Protection Act 2018 and the GDPR.
- If the school is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools) then advice will be sought from the POSIE to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

- DfE Guidance on Information Sharing (July, 2018) provides further detail. *A copy will be kept in the staff room.*
- Data Protection Toolkit for Schools: <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above) If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 3: specific safeguarding issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education and annex B of KCSIE 2021

Annex A also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in prison, child criminal exploitation, and domestic abuse.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused.

They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
 - A mother/family member disclosing that FGM has been carried out
 - A family/pupil already being known to social services in relation to other safeguarding issues
 - A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs
- Potential signs that a pupil may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
 - FGM being known to be practised in the girl's community or country of origin
 - A parent or family member expressing concern that FGM may be carried out
 - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
 - A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it
(although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication The above indicators and risk factors are not intended to be exhaustive.

Appendix 4: Specific Safeguarding Issues

(Also See Annex B of KCSIE 2021)

(a) Peer-on-Peer Abuse (Allegations of abuse made against other children)

- All members of staff at St Peter's Eaton Square recognise that children are capable of abusing their peers. Peer on peer abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and could take place inside school, outside school or online)
 - sexual violence and harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
 - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element
- St Peter's Eaton Square believes that abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of peer on peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures, as outlined in Section 6, above and in accordance with City of Westminster Safeguarding Board procedures.
- St Peter's Eaton Square will take steps to minimise the risk of all forms of peer on peer abuse. We will ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and have access to support both within the school and externally (such as Westminster Police, ChildLine etc.). Further information can be found in (list relevant policies e.g. PSHE, Citizenship, Sex and Relationships Education, online safety etc.)
- Sharing nudes and semi-nudes or 'Sexting' or 'Youth Produced Sexual Images' will not be tolerated and the school will respond to such cases in line with the UKCCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- 'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.
- Further information about the school's response to specific allegations of abuse against pupils can be located in our behaviour, anti-bullying and online safety policies. Further information in relation to the school's approach to "sexting" can be found in the school Online Safety Policy. Please find these on the school website.
- All staff to maintain a culture of 'it could happen here' and that if inappropriate behaviour is addressed early, this can help prevent abusive/violent behaviour

- Victims of abuse will be distressed, which can affect progress in school. If the alleged perpetrator is at the same school, this can be made worse
- Girls are more likely to be victims, boys more likely to be perpetrators
- It could be a group of perpetrators or an individual
- Part 5 Should be read alongside DfE's [sexual violence and harassment](#)
- Staff should keep in mind that some children have additional barriers to disclosing due to vulnerability, disability, gender, ethnicity and/or sexual orientation
- Staff should reflect back, using the child's language, when hearing a report
- Staff should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact upon memory, so children may not be able to recall all details or timeline of abuse

Sexual violence and sexual harassment between children

Peer-on-Peer Abuse

Context

- a. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- b. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- c. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Policy

- a. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.
- b. We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE 2021
- c. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- d. We will minimise the risk of peer-on-peer abuse by: -
 - i. **Prevention:**
 - Taking a whole school approach to safeguarding & child protection
 - Providing training to staff
 - Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum.
 - Engaging with specialist support and interventions.
 - Using a clear reporting system for staff and pupils, that is well promoted, easily understood and accessible
 - Recognising that it may be taking place, even if not reported
 - Publicising the school's zero-tolerance approach to abuse
 - Online safety, including mobile phone usage during school hours

ii. Responding to reports of sexual violence and sexual harassment:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the [Searching, screening and confiscation advice for schools](#) Staff taking a report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.

iii. Risk Assessment: -

- Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider;
 - The victim, especially their protection and support.
 - The alleged perpetrator, their support needs and any discipline action.
 - All other children at the school.
 - The victim and the alleged perpetrator sharing classes and space at school.
 - The risk assessment will be recorded and kept under review.
 - Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

iv. DSL considerations and response

- The DSL will consider: -
 - The wishes of the victim.
 - The nature of the incident including whether a crime has been committed and the harm caused.
 - The ages of the children involved.
 - The developmental stages of the children.
 - Whether there is a power imbalance between the children/young people.
 - Any previous incidents.
 - Ongoing risks.
 - Other related issues or wider context.

Options: The DSL will then consider the following options: -

- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

v. Ongoing Response:

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

- Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

(b) Cybercrime

Online Safety and Peer-on-Peer Abuse

School staff are aware that technology is a significant component in many safeguarding and wellbeing issues:

- Children are at risk of online abuse as well as face to face
- Peer-on-peer abuse can happen online through:
 - Abusive, harassing and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images/videos especially in chat groups
 - Sharing of abusive images and pornography, to those who do not want to receive it

Staff should:

- Recognise and respond to the indicators
- Recognise it may be taking place, even if not reported
- Understand their role in preventing and responding where a child is at risk
- Understand the importance of challenging inappropriate behaviours to ensure a safe environment and not to normalise abuse
- Recognise it can take place inside and outside of school and/or online

Cybercrime is criminal activity committed using computers and/or the internet:-

- Cyber-enabled – crimes happen off-line and enabled at scale/speed online or
- Cyber-dependant – where there is
 - Unauthorised access to computers and illegal hacking, eg accessing a school's computer network to look for test paper answers or change grades
 - Denial of service attacks or 'booting' where 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 interest 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 should consider referring to the Cyber Choices programme, a Police programme supported by the Home Office and led by the National Crime Agency.

Cyber Choices 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 on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, [National Cyber Security Centre - NCSC.GOV.UK](https://www.ncsc.gov.uk)

(c) 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 may 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 St Peter's will give practical advice on how to keep themselves safe. We will provide outdoor-safety lessons run by teachers or by local Police. The lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available here: [Home - Action Against Abduction](#) and [Home - Clever Never Goes](#)

(h) Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery is linked to 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 NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - [Modern slavery - GOV.UK \(www.gov.uk\)](#)

(d) Preventing 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, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

(e) Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

(f) Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact the primary and, if necessary, the secondary contact number held in our data base.
- Take appropriate actions, which could include contacting other parents for knowledge about collection.
- Place the child in after school while we try to make contact.
- Contact emergency services and/or social services in the event of no contact with a family member being made.

(g) Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact the parents
- Contact emergency services

What to do if you have concerns

- Staff should not wait for a child to make a disclosure, they should act on concerns immediately
- Staff may overhear a conversation that suggests a child may have been harmed or behaviour may be an indicator
- If the report includes an online element, staff may confiscate devices for evidence to hand to the Police
- Staff can ask children outright if they have been harmed and what the nature of the harm was

Support

- Pupils who have been experienced peer on peer abuse will be supported by:
 - Being offered an immediate opportunity to discuss the experience with a member of staff of their choice
 - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.

- St Peter's Eaton Square is aware of and will follow the City of Westminster Safeguarding Board procedures <https://fisd.westminster.gov.uk/kb5/westminster/fis/service.page?id=1esMjX5q-JQ> for supporting children who are at risk of harm as a result of their own behaviour.
 - Pupils who are alleged to have abused other pupils will be helped by:
 - Discussing what happened, establishing the specific concern and the need for behaviour to change
 - Informing parents/carers to help change the attitude and behaviour of the child
 - Providing appropriate education and support
 - Sanctioning them in line with school behaviour/discipline policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.

Speaking with police or other local services (such as early help or children's specialist services) as **appropriate – see NCPP advice on when to call the Police, paragraph 26 Local Support**

Next Steps after Initial Report

- The DSL's risk and needs assessment in response to a report of sexual harassment should also consider whether there have been any other victims. The DSL will regularly review the actions taken to respond to reports and
- Regularly review the risk and needs assessment and put active measures in place to safeguard pupils
- Any risk assessment should be informed by any CSC or multi-agency risk assessment

Staff should be aware of the following:

- Be aware of and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline, including those happening outside of school
- Balance the victim's wishes against their responsibility to protect other children
- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Think about other related issues and wider context, including any links to CSE and CCE and take the potential for sexual violence and harassment in intimate personal relationships into consideration
- Keep victim and alleged perpetrator a reasonable distance apart on school premises including at before and after-school activities
- Ensure recording practice is comprehensive and accurate
- The DSL should know what the early help process is and how and where to access support
- The previous restrictions on the use of Police bail have been removed – the Police will now consider what action to take to manage the assessed risk of harm, this could include the use of Police or court bail.

Keeping yourself safe when responding to disclosures

1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously

2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details

- Do not ask leading questions; “Did he/she....?” Such questions can invalidate evidence.
- Do ask open “TED” questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

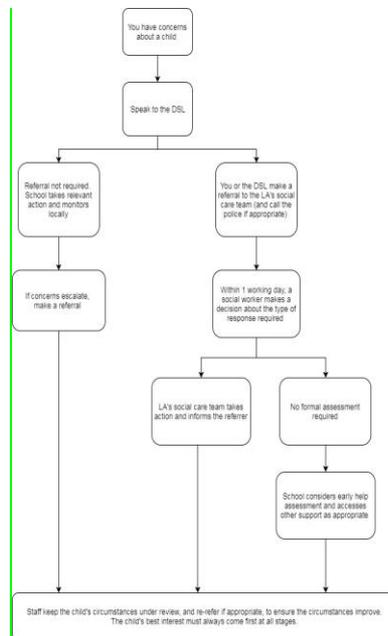
5. Remember

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals

APPENDIX 4 flowchart for concerns and DSL actions



Appendix 5: additional legislation for reference

- Section 175 of the , which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

Appendix 6: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org

- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Abuse

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- FGM: [Summary of Mandatory FGM reporting duty](#)

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk