7a - Safeguarding (Child Protection) Policy – 2024-25

This Policy applies to the whole school including the Early Years Foundation Stage (EYFS). The School has a legal duty to report any concerns if it is thought that a child's welfare may be at risk.

Position	Name	Contact details
Headteacher	Mrs C Macallister	020 8991 7518 Head@sapriory.com
Chair of Governors	Mr P D'Arcy	pdarcy@sapriory.com
Designated Safeguarding Lead Responsible for Looked After Children Prevent Lead E Safety Lead	Miss L Hales - Assistant Head	0208 991 7535 Lhales@sapriory.com
Deputy Designated Safeguarding Lead	Mrs A Lenton Deputy Head Pastoral Ms Olivia McLoughlin Deputy Head Preps, Pre-Preps & EYFS	02089917505 alenton@sapriory.com 02089917526 Omcloughlin@sapriory.com
Designated Safeguarding Governor	Mr James Davies	020 8991 7514 (Bursar) jdavies@sapriory.com
Local Authority Designated Officer (LADO)) Safeguarding, review and quality assurance manager Allegations against staff and volunteers Child protection conferences, MARAC, MAPPA and FGM	Natalie Cernuda (LADO)	Email: asv@ealing.gov.uk Tel: 07890940241 Duty: 020 8825 8930
Child protection advisers		Child protection duty desk 020 8825 8930
Child Protection Administration (to contact CPA for advice)		Child protection duty desk Tel: 020 8825 8930

Child sexual exploitation (CSE) and missing coordinator	Christina Evers	Tel: 020 8825 5951 EversC@ealing.gov.uk
Ealing Council children's services		Tel: 020 8825 8000 (ECIRS)
Child Abuse Investigation Team (CAIT)		Tel: 020 8246 1901
DfE dedicated telephone helpline for staff and governors		020 7340 7264 counter-extremism@education.gsi.gov.uk
Police Child Protection Team		0208 246 1901 FGM mandatory reporting call 101
Local Safeguarding Partnership: Ealing	Family Information Service	**020 8825 5588** (Mon-Fri, 9 am to 5 pm) children@ealing.gov.uk
Other useful contacts can be found in Appendix 1		

Approved by:	Board of Governors (Safeguarding Committee)
Last reviewed on:	
Reviewed and updated by Head, DSL and DSLs	
Next review due by:	

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Abbreviations and School Specific Terms

CME	Children Missing Education
DBS	Disclosure and Barring Service (DBS)
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education (previously DCSF)
DSL	Designated Safeguarding Lead
ESCP	Ealing Safeguarding Children Partnership
EYFS	Early Years Foundation Stage
LADO	Local Authority Designated Officer
LSCP	London Safeguarding Children Partnership
PSHEE	Personal, Social and Health and Economic Education
PSED	Personal, Social and Emotional Development
SEND	Special Educational Needs and Disability
TRA	Teacher Regulation Agency
Priory 6	Sixth Formers

St Augustine's Priory Safeguarding Policy

Mission Statement

Our girls will change the world

- We are a Catholic community inspired by the vision of our founders and passionate about shaping a better future.
- We empower pupils with outstanding results, a love of learning and an alternative way of thinking.
- Augustinians are ethical leaders sowing joy, truth and courage.
- In this school freedom and generosity of spirit flourish. We seek a sustainable and prosperous future for all the world's communities.
- We cherish love for our neighbour, welcoming different faiths and cultures. Learning through dialogue we have hearts open to the whole world.

Statement on Safeguarding

Safeguarding is the multi-disciplinary work we do to minimise and manage risk to children and young people who may be vulnerable. It employs a framework which brings together all aspects of an investigation into an allegation of abuse against the vulnerable. This policy takes into account our whole school approach to safeguarding and child-on-child abuse. This policy will be reviewed annually or in accordance when lessons are learnt.

Aims

The school's policy aims to ensure that:

- Pupil Voice and participation in our processes is paramount
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare ensuring that best practice in inclusion, equity and diversity is at the heart of all we do
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping children safe in education 2024 (publishing.service.gov.uk) and Working together to safeguard children - GOV.UK (www.gov.uk) and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy also has regard to the following:

- Part 3 of the schedule to the https://assets.publishing.service.gov.uk/media/5cd3fc2fe5274a3fd6ee74b0/Independent_School_Standards-_Guidance_070519.pdf, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- Statutory guidance on the Prevent duty, (July 2015, updated 2023) which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of

radicalisation and extremism and the use of social media for on-line radicalisation. Prevent is supplemented by non-statutory advice and a briefing note.

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

The School's Commitment to Safeguarding:

a) All children have a fundamental right to be protected from harm; the interests of the child are paramount, and the school is committed to acting in the best interests of the child.
b) The Governors, Headteacher and Staff of St Augustine's Priory fully recognise their responsibilities to safeguard all children including those in the EYFS. We recognise that all staff and volunteers have a full and active part to play in protecting our pupils from harm. We recognise the particular expertise and overview shared by the Designated Safeguarding Leads across the school.
c) All staff are committed to ensuring that our school should provide a caring, positive, safe and stimulating environment, which promotes the social, physical, emotional and moral development of the individual child.
d) Adherence to this policy is mandatory for all staff and volunteers of St Augustine's Priory including when working with pupils off site.
e) The school recognises that the responsibility of making decisions about referrals lies with the school's Designated Safeguarding Lead (DSL), but staff are aware that they can make direct referrals if deemed necessary. We will always refer to local guidance on thresholds and make clear the route for obtaining informal advice on borderline cases from local agencies. We work in accordance with the guidance which notes the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.
f) Our policy requires that any deficiency or weakness in safeguarding arrangements is remedied without delay.
g) The importance of Safeguarding to the school is reflected in the number of trained DSLs at St Augustine's Priory.
h) In the case where a DSL is absent, a DDSL will cover and fulfil DSL duties. All staff will be notified by email when this is the case, making it clear who is covering and for how long.

Definitions

A child is defined as anyone who has not yet reached their 18th birthday.

Safeguarding and promoting the welfare of children means:

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

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

Vulnerable Children, including those with SEND, and Types of Abuse

Some children are more vulnerable than others, including those who:

- are disabled or who have certain health conditions;

- has special educational needs, whether or not they have a statutory Education, Health and Care Plan (SEND, EAL);
- are asylum seekers;
- are young carers;
- have mental health needs (or living with mental health needs in the family);
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are frequently missing/goes missing from care or from home;
- are at risk of modern-day slavery, trafficking, sexual or criminal exploitation;
- are at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- are misusing drugs or alcohol themselves;
- have returned home to their family from care;
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- are looked after or previously looked after children;
- are privately-fostered;
- are persistently absent from education, including persistent absences for part of the school day;
- and those living in difficult situations such as domestic violence, drug and alcohol misuse and adult mental health issues.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See Types of Abuse section for detailed definitions of 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.

Child on child abuse is a form of abuse where physical, sexual, emotional and financial coercive control is exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

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

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

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

Equality statement

St Augustine's Priory is committed promoting a respectful environment and culture which has full regard to those with protected characteristics to equal treatment for all pupils regardless of an individual's race, ethnicity, sexual orientation, religion and social background including those with special educational needs and all disabilities. We aim to create a friendly, respectful, caring and protective environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of our pupils. Our RADIO toolkit is one of the key ways in which we promote active participation in inclusion, diversity and equity. We constantly advance ways of enhancing Pupil Voice.

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
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

St Augustine's Priory aims to:

a) regularly train and raise the awareness of both teaching and non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse and to make sure that ours is a culture where staff feel able to raise concerns and feel supported in their safeguarding role. Regular formal training for staff is supplemented with informal updates, for example, staff meetings
b) ensure that pupils and parents are aware that St Augustine's Priory takes child safeguarding seriously and will follow the appropriate procedures for identifying and reporting abuse and for dealing with allegations of abuse against staff and volunteers
c) develop and promote effective working relationships with other agencies, including the Police and Ealing Social Care Partnership so that pupils' individual needs are met if they are in need of additional support
d) support the child's development in ways which will foster security, confidence and independence
e) establish a safe environment in which children can learn and develop, feel secure and know they are listened to
f) ensure that children know that there are adults within the school they can approach if they are worried or in difficulty

g) equip pupils through the curriculum, in particular PSHEE, RSE, and PSED in the EYFS, with the knowledge and skills to stay safe from abuse and to know to whom to turn for help
h) teach pupils about how to stay safe, based on a wide view of what may happen to pupils, not only in schools but beyond, including keeping safe-online (for further details see our separate digital responsibility/'e-safety' & PSHEE/RSE policies)
i) provide a systematic means of monitoring children known or thought to be at risk of harm (e.g. vulnerable pupils lists)
j) develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected cases of abuse
k) emphasise the need for good levels of communication between all members of the School community
l) promote an awareness that child abuse transcends class, ethnicity and culture
m) practise safer recruitment in checking the suitability of staff and volunteers to work with children
n) ensure that the school community follows the guidance set out in the publication "What to do if you're worried A Child is Being Abused" (see Appendix 1 – Key References and Useful Websites)
o) ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
p) educate pupils to be aware of the risks of grooming and radicalisation and exploitation from social media and the internet, as well as use of portable technology (e.g. mobile phones and sexting)
q) engage fully with the school and the Government's Prevent strategy

Procedures:

St Augustine's Priory, through the Governing Body and Headteacher will ensure that:

a) The school's Safeguarding Policy is in compliance with Keeping Children Safe in Education (2024) (KCSIE) Section 2:22, (see Appendix 1 – Key References and Useful Websites) so that it will be in line with the London Child Protection Procedures under the auspices of the Strategic Partnership from 29th September 2019, the London Safeguarding Children's Partnership (LSCP) and Ealing Safeguarding Children Partnership (ESCP).
b) We have a Designated Safeguarding Lead (DSL) who has the status and authority to carry out the duties of the post. The DSL undertakes all required training and regularly (a minimum of one day every two years) attends training in Safeguarding, Child Protection and Inter-Agency working. DSL refresher training will take place in January 2025. The two-yearly training is supplemented with online courses delivered by The Key and other professional organisations alongside informal updates, for example, e-bulletins. All Designated Safeguarding Leads at St. Augustine's Priory are members of the Senior Leadership team.
c) We have a Deputy Designated Safeguarding Lead (DDSL) for EYFS who has undertaken all required training and who has the status and authority to carry out the duties of the post.
d) We have a further Deputy Designated Safeguarding Lead who has undertaken all required training (date of last Designated Person Training May 2023) and who has the status and authority to carry out the duties of the post.
e) Each DSL/DDSL can deputise for the other(s) in their absence
f) The DSL (and in her absence the DDSLs) will liaise with local statutory children's agencies as appropriate and will also be designated responsible for Looked After Children, in conjunction with the Safeguarding Governor. The DSL, DDSLs and Headteacher will co-operate as required with their enquiries including attendance at case conferences.
g) All members of staff, volunteers, and staff from external & supply agencies, all pupils and parents are aware of the identity of the DSL and DDSLs, responsible for child protection matters.

h) We have a designated member of the Governing Body with responsibility for Safeguarding matters who has undertaken all required safeguarding training, local authority safeguarding training for governors and at that least one member of the Governing Body has undertaken 'Safer Recruitment in Education' training.
i) All staff must be provided with induction training that includes: the school's Safeguarding/Child Protection policy including Prevent training; Staff Code of Conduct; Whistleblowing policy and Acceptable Use of Technologies policy; the Pupil Behaviour policy; Children Missing in Education Policy, KCSIE Part 1 and Annex A. These are distributed electronically.
j) All staff, including temporary, part-time, and volunteer staff, receive training in Safeguarding and Child Protection as part of whole staff INSET, as well as specific training for new staff as part of their induction. All staff receive training in making a referral and school procedures for this. Safeguarding training is repeated annually and staff sign a declaration to say they've read the guidance at the beginning of each academic year. All members of staff develop their understanding of, and are alert to, the signs and indicators of abuse. Staff who do not work directly with children will read **either** part 1 of KCSIE or annex A of KCSIE (a condensed version of part 1).
k) All members of staff know how to respond to a pupil who discloses abuse.
l) A record is kept with the DSL of all Safeguarding, Child Protection and Inter-Agency training carried out in and on behalf of the school.
m) All staff, including temporary staff, part-time volunteers and contractors are aware of their responsibilities and of their duty to report any concerns as soon as possible to the DSL (see below).
n) Training is also required for the host families of pupils who are privately fostered. Where a pupil is hosted in a private fostering arrangement, a home visit will be undertaken by the school. The Local Authority will be informed.
o) For Looked After Children (LAC), a designated member of staff will have responsibility for their welfare and progress and have up-to-date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.
p) All staff understand 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.
q) All parents/carers and voluntary staff are made aware of the responsibilities of staff members with regard to safeguarding/child protection procedures and of their duty to refer any concerns to the DSL/DDSL.
r) The DSL will keep written records of all safeguarding concerns about children. Where such records are made a note will be made on the pupil's main file. The DSL and Headteacher will ensure all Safeguarding records are kept securely, separate from the main pupil file and in a locked location.
s) If an allegation is made against a member of staff, supply staff or a volunteer the Headteacher will make an immediate referral, no later than one working day, to the Local Authority Designated Officer (LADO). If an allegation is made against the Headteacher then the Chair of Governors will make an immediate referral to the Local Authority Designated Officer (LADO). See the Low Level Concerns Section for how to report a low level concern.
t) Safer recruitment practices are followed at all times. (See Safer Recruitment section of this Policy). In the EYFS we ensure that we adhere to the guidance for 'Suitable people'.
u) Written confirmation is sought from external agencies that all their staff have been appropriately checked with the Disclosure and Barring Service (DBS) and also that all checks have been carried out on their staff's identity, medical and physical fitness to work with children, references, right to work in the UK and their suitability to work with children. If the person is a teacher, a prohibition check will be completed. Where appropriate, an overseas check will be undertaken. As an all-through school, all staff have been requested to complete an annual Disqualification from childcare

self-referral. The School will undertake to confirm the identity of all agency workers and will seek independent confirmation of satisfactory DBS clearance.

v) In the cases where the school's pupils are supervised away from school by the staff of another organisation, assurance is sought that appropriate child protection checks have been carried out

w) Staff, parents and visitors will only use their personal mobile phone during non-contact time in non-pupil areas of the school, including the EYFS (see Use of Mobile, Cameras and other Digital Devices policy for EYFS Appendix 7). Pupils are required to lock away their phones and mobile devices during the school day. Sixth formers are allowed to use their personal mobile phones only in the Priory Sixth Common room Staff will only use the school's electronic equipment when photographing or videoing pupils. School cameras, videos or memory cards will not be removed from the school premises (unless being used on a school outing). Staff will ensure that all images of pupils are stored securely, and pupils' images are only used when parental permission has been given to do so either via the school's Terms and Conditions or via a separate consent form for EYFS. This will also apply to remote learning (see Safeguarding during Remote Teaching and Learning policy for more guidance).

x) 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.

y) All staff will be given a copy of the Safeguarding Children policy 7a and will be required to sign a record confirming that they have received and read the policy. Copies of these records are held in individual personnel files.

z) Two emergency contact numbers are kept for each pupil.

Responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

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

The Governing Body

a) Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and ensure that children know how to keep themselves and others safe.

b) The Governing Body will nominate a Safeguarding Governor to undertake the tasks specified below. The Governing Body will approve the Terms of Reference for the Safeguarding Committee. The Governing Body will receive a report from the Safeguarding Committee at each of its meetings. The Governing Body will undertake an annual review to evaluate the Safeguarding policy and the annual Safeguarding report, ensuring it complies with the law and will hold the Headteacher account for its implementation.

c) The Governing Body is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

d) Make sure:

- They are aware of the Provision of KCSIE 2024 Annex C
- That child protection files are maintained as set out in Annex C
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns when identified
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognized.

e) The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate. The Chair of Governors will immediately liaise with the LADO regarding any accusation made against the Headteacher or any DSL (see section 12).

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

g) All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge to provide strategic challenge to test and assure themselves
- that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding. Their training should be regularly updated.

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.

h) Governors will be made aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and their local multi-agency safeguarding arrangements and the potential applicability of the HRS in relation to harassment, violence and/or abuse, including of a sexual nature

Designated Governor

a) The Designated Governor for Safeguarding has received Local Authority Training in Safeguarding and Child Protection for Governors, appropriate Safeguarding Training and will ensure that at least one member of the Governing Body has completed Safer Recruitment Training. The Designated Governor chairs the Safeguarding Committee and works closely with the Headteacher and the DSL and DDSLs to promote safeguarding.

b) Together with the Headteacher, the Safeguarding Governor and DSL/DDSLs:

- Undertake an annual review and evaluation of the school's Safeguarding and Child Protection procedures and of the efficiency with which the related duties have been discharged to ensure that the school is safeguarding and promoting the welfare of pupils at St Augustine's Priory. The detail of this review is sufficient to demonstrate both breadth and depth. The review is reported to the school's Governing Body on an annual basis.
- Prepare an annual review of the Safeguarding policy for review by the full Governing Body.
- Ensure that any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay.
- Together with the Governing Body, approve amendments to Safeguarding and Child Protection arrangements in the light of changing regulations or recommended best practice at least annually.
- Monitor training and support given to the DSL.
- Ensure that the DSL and DDSLs have undertaken the requisite training for their roles, as specified in their job description and that they have sufficient time and resources to undertake their duties as specified below and are persons of recognised status of authority within the school.
- Regularly speaks to a number of staff and pupils across the school, to check their knowledge of their policies and their awareness of the DSL/DDSLs when visiting the school, and staff across the school to see if they would know who to go to in the case of suspected abuse and how they should speak to the child. The safeguarding governor will select two members of staff at random from the single central register for this. Evidence is recorded in Governors' visits records.
- Approves the DSL/DDSLs' job descriptions which includes key activities of the role.
- Reviews how children are taught about safeguarding.
- Advocate best practice in promoting good mental health and inclusion for those affected.
- Checks that the DSL/DDSLs would have the knowledge, skills and understanding necessary to keep safe children who are looked after by a local authority even if there are none on the school roll.

Headteacher

a) The Headteacher is responsible for ensuring that staff (including temporary staff) and volunteers:

- Actively creates a culture with zero tolerance of sexism, misogyny, misandry, homophobia, biphobia and sexual violence/harassment
- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

b) The Headteacher is responsible for appointing Designated Safeguarding Leads for the Seniors and Preps and Pre-Preps (EYFS). These are listed on the front of this policy and are all members of the Senior Leadership Team.
c) The Headteacher is responsible for liaising with the designated officer at the local authority (sometimes referred to the LADO) for child protection concerns in cases which concern a staff member or volunteer.
d) The Headteacher will communicate this policy to parents when their child joins the school and via the school website and ensure that parents know referrals about suspected abuse or neglect may be made and the role of the organisation in this.
e) The Headteacher will ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
f) The Headteacher is responsible for ensuring that all staff and volunteers have received appropriate safeguarding training and that this training is up to date, content is updated and a record is kept.
g) The Headteacher together with DSL and DDSLs is responsible for appropriately supporting, in line with legislation, all children and staff when abuse occurs or allegations of abuse are made.
h) The Headteacher is responsible for ensuring that support for DSLs is in place.
i) The Headteacher will act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
j) The Headteacher will make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
k) The Headteacher will ensure the relevant staffing ratios are met in EYFS, where applicable.
l) The Headteacher will make sure each child in the Early Years Foundation Stage is assigned a key person.

Designated Safeguarding Lead:

The DSL is responsible for:

a) Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them including overseeing a preventative
b) helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role includes ensuring that the school staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. This is also done in conjunction with the SENCO
c) understanding the assessment process for providing early help and statutory intervention, including the local criteria for action and ESCP children's social care referral arrangements. Taking the lead with referrals and establishing that the local authority has made a decision about the type of response within 24 hours or one working day. Where a colleague has made an initial referral, the DSL should follow up and support staff who have made a referral to the local authority
d) having a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and being able to attend and contribute to these effectively when required to do so
e) adhering to three safeguarding partners, ESCP and national guidance, London Child Protection Procedures, and school procedures with regard to referring a child if there are concerns about possible abuse

f) ensuring that all Safeguarding and Child Protection policies and procedures are in place and are enforced and that all staff, especially new and part-time staff are aware of their need to safeguard children at all times
g) keeping detailed and accurate written records of all safeguarding concerns about a child, including those on MyConcern
h) ensuring that all such chronological records are kept confidentially and securely and are separate from pupil records, including those on MyConcern, and ensuring that an indication of such further record-keeping is marked on the pupil's records in accordance with ESCP procedures
i) monitoring the attendance and development of all children lest they go missing and in particular any child who is on the Child Protection Register or is the subject of a Care Order
j) ensuring that any pupil currently on the Child Protection Register, who is absent without explanation for two days, is referred to Family Services and the Education Welfare Service in the Borough and after ten consecutive days for others
k) operating safer recruitment procedures (including DBS checks and compliance with Independent school Standards Regulations)
l) maintaining an overview of safeguarding within the school, opening channels of communication with local statutory agencies and monitoring the effectiveness of policies and procedures in practice
m) understanding the unique risks associated with online safety and being confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online and take a lead investigating Forensic Monitoring reports
n) being able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support send children to stay safe online
o) advocate best practice in promoting good mental health and inclusion for those affected
p) having a good understanding of harmful sexual behaviour
q) discussing the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
r) being confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
s) being aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
t) ensuring that any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay
u) liaising with other agencies to report or consult on the wellbeing of all pupils, e.g. Channel, ESCP, ECIRS, Ealing SAFE, CAMHS and so on. Contextual information should be shared where appropriate
v) using the resource 'NPCC- When to call the police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do. Refer cases to the Police where a crime may have been committed as required.
w) being available to staff during staff hours (if the DSL is off-site, staff are aware that they can talk to a Deputy DSL). The DSL is also available via the school emergency contact number outside school hours, or a Deputy DSL if the DSL is unavailable. Staff can also submit an online MyConcern referral at any time
x) act as a source of support, advice and expertise regarding safeguarding for all staff and volunteers
y) ensuring she updates her knowledge and skills annually and feeds back her knowledge to the Deputy Designated Safeguarding Leads and the Safeguarding Committee. This includes annual Prevent training and interagency working.

z) in addition to formal training her knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding officers, or simply taking time to read and digest safeguarding developments) at regular intervals as required to allow her to understand and keep up with any developments relevant to the role

aa) updating staff training on safeguarding at least annually in line with LSCP advice

bb) ensuring that safeguarding files have been transferred securely to the child's next school, separately from their pupil file and ensure confirmation of receipt. Best practice involves the DSL contacting the new school's DSL directly to share information where appropriate

cc) liaising with the Headteacher to inform her of issues especially any ongoing issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. Liaise with the school's strategic safeguarding manager to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations

dd) liaise with other relevant members of staff in school that have a role in children's welfare on matters of safety and safeguarding

Deputy Designated Safeguarding Leads:

The Deputy Designated Safeguarding Leads will deputise for the Designated Safeguarding Lead in her absence. They will be responsible for:

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

b) helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role includes ensuring that the school staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. This is also done in conjunction with the SENCO

c) understanding the assessment process for providing early help and statutory intervention, including the local criteria for action and local authority children's social care referral arrangements. Taking the lead with referrals and establishing that the local authority has made a decision about the type of response within 24 hours or one working day. Where a colleague has made an initial referral, the DSL should follow up and support staff who have made a referral to the local authority

d) having a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and being able to attend and contribute to these effectively when required to do so

e) adhering to three safeguarding partners, ESCP and national guidance, London Child Protection Procedures, and school procedures with regard to referring a child if there are concerns about possible abuse

f) ensuring that all Safeguarding and Child Protection policies and procedures are in place and are enforced and that all staff especially new and part time staff are aware of their need to safeguard children at all times

g) keeping detailed and accurate records of all safeguarding concerns about a child, including those on MyConcern

h) ensuring that all such chronological records are kept confidentially and securely and are separate from pupil records, including those on MyConcern, and ensuring that an indication of such further record-keeping is marked on the pupil's records in accordance with ESCP procedures

i) monitoring the attendance and development of all children lest they go missing and in particular any child who is on the Child Protection Register or is the subject of a Care Order

j) ensuring that any pupil currently on the Child Protection Register, who is absent without explanation for two days, is referred to Family Services and the Education Welfare Service in the Borough and after ten consecutive days for others
k) operating safer recruitment procedures (including DBS checks and compliance with Independent school Standards Regulations)
l) maintaining an overview of safeguarding within the school, opening channels of communication with local statutory agencies and monitoring the effectiveness of policies and procedures in practice
m) understanding the unique risks associated with online safety and being confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online and investigating Forensic Monitoring reports with the DSL
n) being able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support send children to stay safe online
o) advocate best practice in promoting good mental health and inclusion for those affected
p) having a good understanding of harmful sexual behaviour
q) discussing the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
r) being confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
s) being aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
t) ensuring that any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay
u) liaising with other agencies to report or consult on the wellbeing of all pupils, e.g. Channel, ESCP, ECIRS, Ealing SAFE, CAMHS and so on. Contextual information should be shared where appropriate
v) using the resource 'NPCC- When to call the police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do. Refer cases to the Police where a crime may have been committed as required.
w) being available to staff during staff hours (if the DSL is off-site, staff are aware that they can talk to a Deputy DSL). The DSL is also available via the school emergency contact number outside school hours, or a Deputy DSL if the DSL is unavailable. Staff can also submit an online MyConcern referral at any time
x) Act as a source of support, advice and expertise regarding safeguarding for all staff and volunteers
y) ensuring she updates her knowledge and& skills annually and feeds back her knowledge to the Deputy Designated Safeguarding Leads and the Safeguarding Committee. This includes annual Prevent training
z) in addition to formal training her knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding officers, or simply taking time to read and digest safeguarding developments) at regular intervals as required to allow her to understand and keep up with any developments relevant to the role

Staff Responsibility and Staff Training

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

- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

Induction Training

During Induction Training, all staff and volunteers will be provided with electronic copies of the following documents:

- St Augustine's Safeguarding and Child Protection Policy
- Role of DSL and DDSLs
- Staff Code of Conduct/Behaviour Policy which includes staff / pupil relationships, and comms and social media, the Low-Level Concerns Policy
- Pupil Code of Conduct/Behaviour Policy
- Whistleblowing Policy
- Acceptable Use of Technologies Policy and Online safety
- Children Missing in Education Policy
- KCSIE Part 1 & Annex A / Annex B for school leaders and all who work directly with children
- 3b Pupils with SEND and EAL Policy
- Inclusion, diversity and equity

On-going staff training, at least annually and including formal and informal updates

will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning and includes how to manage a report of child-on-child sexual violence and sexual harassment.
- Be in line with advice from the 3 safeguarding partners including Prevent awareness training
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All Staff and Volunteers must recognise their responsibility to be aware of:

a) part 1 and Annex A of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) 2024 and review this guidance at least annually **or** a condensed version for those who do not regularly work with children
b) the contents of this Safeguarding (Child Protection) Policy and have the opportunity to ask questions in relation to the Policy & Procedures. All staff will be required to sign to confirm that they have received and read this Safeguarding (Child Protection) Policy. All staff and volunteers will be required to sign and abide by the school's 'Staff Code of Conduct'. They will also sign an annual declaration regarding disqualification from childcare
c) the need to support children who have been abused in accordance with the agreed Child Protection Plan
d) the fact that children can be at risk of harm inside and outside of their home, at school and online
e) their role in the Early Help process and be prepared to identify children who may benefit

f) the signs of possible abuse, including child on child abuse (see below), and what to look for to identify children who may need help or protection
g) the need to respond appropriately to any significant changes in a child's general well-being – (including significant changes in children's behaviour, deterioration in children's general well-being, unexplained bruising, marks or signs of possible abuse or neglect, children's comments which give cause for concern, any reasons to suspect neglect or abuse outside the setting, inappropriate behaviour displayed by other members of staff or any other person working with the children) - this includes supporting systems which place the child at the heart of our practice
h) comments children make which give cause for concern
i) the need to be open, accepting and ready to listen to a child. The need to take the child's worries seriously and not to interrupt if she/he is recalling a significant event; the need to avoid asking leading questions; and the fact that confidentiality cannot be promised to a pupil giving evidence
j) the requirement to make a **handwritten** note of the discussion as soon as possible and at the latest within 24 hours to give to the DSL or a DDSL, noting time, date, place, people present and what was said. These notes may be required in a court proceeding. A MyConcern entry can be submitted as well. Handwritten notes can be scanned and added to this submission. All concerns, discussions and decisions should be recorded in writing.
k) the difference between "a concern about a child" and "immediate danger or risk of harm" – the latter being a safeguarding concern. When a child is in immediate danger or risk of harm, a referral should be reported to Children's Social Care immediately. If a member of staff has a concern about a child, this should lead to early help, inter-agency assessment and intervention using local processes, including the use of the Common Assessment Framework (CAF) and Team around the Child (TAC) approaches
l) the need to discuss concerns with the DSL or a DDSL and decide on a course of action where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately – this includes risk of abduction
m) understand that the DSL is best placed to make a referral but anyone can make a referral. In both cases (child in immediate danger or risk of harm), staff making a referral should inform the DSL as soon as possible. The local authority should make a decision about the type of response within 24 hours or one working day
n) that any member of staff has a duty to make a referral to external agencies if they consider that the school response has been inadequate and to persist with such until they are satisfied with the response
o) that parental consent is not required for referrals to statutory agencies where this might put the child(ren) at risk of harm but that otherwise parents will be informed
p) the need to pass on to the DSL and the local authority that a child may be in a private fostering arrangement
q) the need to maintain an appropriate level of confidentiality whilst liaising with relevant professionals
r) the need to support/monitor any child as required and know what to do if a child tells then he/she is being abused/exploited or neglected.
s) the school's reporting arrangements (see Appendices 4,5 & 6)
t) the contact details for agency involvement which are set out on page 1 of this policy
u) the guidance for staff, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example one to one tuition, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, in close one-to-one teaching, particularly in specialist performing arts and sports provision – see the Staff Code of Conduct for further guidance)
v) that safeguarding issues can manifest themselves via child-on-child abuse (see below) and the procedures for dealing with child-on-child abuse at St. Augustine's Priory

w) their duty to report all cases of FGM (female genital mutilation) as of 1st October 2015 to 101, the police non-emergency number. Suspected cases should also be referred to the DSL or a DDSL
x) the Prevent duty particularly with regard to young people and vulnerable young adults; being mindful of the increased risk of radicalisation via social media and the internet. In the case of pupils identified as being at risk of radicalisation, schools will need to consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care
y) Contextual factors that may put children at risk, such as the vulnerability of SEND pupils in particular
z) The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children

Staff will be trained formally on the above Safeguarding responsibilities during staff INSET days which occur throughout the year, as well as at whole staff meetings and through regular updates and notifications from the DSL/DDSL team. Where appropriate, external agencies will be used to supplement internal Safeguarding training e.g. MyOnStream package, Ealing Children's Safeguarding Partnership etc.

Specific online safety training (digital responsibility)

All staff must read and sign the school's Acceptable Use of Technology policy and adhere to the policy at all times.

The E-Safety committee and Digital Strategy committee also support specific online safety training needs.

Contextual Risk Factors

Early Help

Any child may benefit from early help. Help intervention may be required for pupils with the following risk factors and indicators:

- Eating disorders
- Self-harm
- Aggressive behaviour towards others
- Sudden unexplained absences from school or other risks associated with children missing from education and any risk from County Lines
- Drug/alcohol or substance misuse
- Drug/alcohol or substance misuse by family members and carers
- Running away/going missing/fear of going home
- The child is unnaturally compliant to/fearful of parents/ carers.
- Behaviour or signs in parents/carers which give or may give cause for concern
- Pupil mental health concerns or needs
- Parental mental health concerns or learning difficulties
- Domestic abuse or violence at home
- The child or family resist contact with school professionals and other professionals
- The child is a young carer
- The child is privately fostered
- The child may be involved with the Court system
- The child has special educational needs, whether with an EHCP or not
- The child has a disability or specific additional needs
- The child is at risk of being drawn into anti-social or criminal behaviour, or is at risk of exploitation, at risk of radicalisation, or cybercrime
- The child shows early signs of neglect and/or abuse

- Looked after or previously looked after children (LAC)
- Family bereavement
- Family separation or divorce, which may involve attending family courts
- The child has been a victim of crime or has witnessed a crime
- Family members in prison
- Homelessness or the threat of homelessness
- LGBT children are known to be more vulnerable to child-on-child abuse
- Child is at risk of modern slavery invoking the National Referral Mechanism

There are many ways in which child abuse may come to staff attention:

- the child may tell you
- a child's friend or relative may tell you
- you may notice injuries
- the child may behave in a very sexually explicit way
- community safety alerts sometimes enable staff to be proactive in keeping children safe.

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

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

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

See https://www.egfl.org.uk/services-children/early-help-assessment-and-plan-ehap for local procedures for Early Help.

Types of Abuse and Neglect

The details of the types of abuse listed below are taken from the London Child Protection Procedures (4thEd) Ch. 4.

Neglect

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 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.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. It may include FGM or other physical forms of abuse such as breast ironing – please see Honour Based Violence below.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes abuse of children through sexual exploitation.

Sexual abuse includes non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

This may include online grooming, the sharing of sexual images of a young person without their consent or with their consent if under age, or cyber bullying, and sexting. The perpetrator may also be a young person.

Sexual abuse can also take place between children, including, but not limited to, child on child sexual violence and child on child sexual harassment.

Emotional Abuse

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

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the 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; for example, where there is domestic abuse;
- Serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children;
- Exploiting and corrupting children;
- This may include radical indoctrination by extremist families;
- This may include coercive, controlling behaviour.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which

an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Terrorism

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Honour-Based Abuse (HBA)

So-called "Honour-Based Abuse" (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL or a DDSL. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be 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, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. 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 of definitions and indicators are included in Annex A KCSIE 2024.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Sharing of nude or semi-nude imagery/'sexting' (youth-produced sexual imagery)

See sections above and below on Sexual Abuse, Child Sexual Exploitation and Child-on-Child Abuse. Youth-produced sexual imagery or 'sexting' may occur in an apparently consensual manner but staff should be aware of the risks to pupils of exploitation and grooming, and legal concerns with sending illicit images. Children may feel shame about the images or messages concerned and may be highly secretive.
Sexting can be a form of child-on-child abuse which can include child-on-child sexual violence and child-on-child sexual harassment.

Your responsibilities when responding to an incident

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

If you are made aware of an incident involving the sharing of nude or semi-nude images or '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.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL
If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.
They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

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

Referring to the police
If it is necessary to refer an incident to the police, this will be done by dialling 101.

Recording incidents
All sharing of nude or semi-nude imagery or 'sexting' incidents and the decisions made in responding to them will be recorded.

Staff Training
Staff will receive on-going training to help identify and manage child on child abuse.

Curriculum Coverage
Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education and digital responsibility programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

Reporting Systems for our Pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- In the first instance, pupils should identify a trusted adult or adults they feel comfortable talking to. This may be their form teacher, Head of Year, Deputy Head, SENDCO, school nurse, pastoral assistant or any other teacher they have a good relationship with.
- Pupils aware of the reporting systems and processes through discussion in form time, assemblies, information pages in their planner and through relationship/sex education curriculum.
- Pupils will be made to feel safe in submitting any concerns, for example, when staff provide reassurance following disclosures.

Mental Health

See separate Mental Health and Wellbeing Policy.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. As such if staff have a mental health concern about a child that is also a safeguarding concern and immediate action should be taken including speaking to the DSL.

- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their Safeguarding Policy and speaking to the designated safeguarding lead or a deputy.
- The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and

young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

Domestic Abuse/Domestic Violence

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Older children may also experience domestic abuse and/or violence in their own personal relationships. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who live in families where domestic abuse occurs may be affected emotionally and may also be at risk physically. They may also be experiencing neglect. Staff should be aware that, although the child may not be the direct victim of the abuse, this is a safeguarding concern. Siblings, both at the school and elsewhere, should be included when addressing these cases. Staff are aware that this abuse may be verbal or emotional, or may be a form of coercive control. It may also be financial control and coercion.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass and we are also part of the London Borough of Ealing's `The Box' scheme.

The DSL will provide support according to the child's needs and update records about their circumstances.

Children Who Run Away or Go Missing

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Accurate and timely attendance procedures are followed rigidly, with immediate checks by office staff for unexplained or unauthorised absences. Staff are trained to raise concerns directly with the relevant DSL or DDSL. Regular checks on registers are carried out by pastoral managers such as the Deputy Heads (Seniors), Heads of Year and Prep Phase Leaders. A weekly update of registers is distributed to senior staff for further monitoring, including the Headteacher. Concerns about attendance are raised at regular meetings.

Pupils transferring to other schools at any point are kept on roll here until joining the school roll at their new school. For pupils where the new school cannot be confirmed, a referral is made to Ealing's Children Missing Education office via a CME form and a Reasonable Enquiry Form.

Please refer to the Children Missing Education Policy, Supervision of Pupils Policy and the Missing Child Policy.

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.

Recognition of Abuse and Neglect

The factors described below are frequently found in cases of child abuse or neglect. Their presence is not proof that abuse has occurred, but they:

- **must** be regarded as indicators of the possibility of significant harm;
- indicate a need for careful assessment and discussion with the school's DSL or a DDSL.

The DSL/DDSL may require consultation with and/or referral to the LA children's social care and/or the police. The DSL/DDSL will always take advice about thresholds. The school has a strong practice of the DSL and DDSLs working together with Headteacher to test each other's actions in a supportive framework to ensure that no-one slips through the net.

- Staff are reminded that abuse could be by one or more pupils against another pupil (child-on-child abuse)
- Staff must adopt an attitude of 'it can happen here'.

When there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm the school will report its concerns to the local authority social care department and/or the police.

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent or carer;
- Act in a way that is inappropriate to their age and development.
  The parent or carer may:
- Persistently avoid routine child health services and/or treatment when the child is ill;
- Have unrealistic expectations of the child;
- Frequently complain about / to the child and may fail to provide attention or praise (high criticism / low warmth environment);
- Be absent or leave the child with inappropriate carers;
- Have mental health problems which they do not appear to be managing;
- Be misusing substances;
- Persistently refuse to allow access on home visits;
- Persistently avoid contact with services or delay the start or continuation of treatment;
- Be involved in domestic violence;
- Fail to ensure the child receives an appropriate education.

The table below gives examples of possible indicators of abuse and/or neglect however this list is not exhaustive and the reader is referred to the London Child Protection Procedures (4th Ed) Ch. 4 for a more information. (See Appendix 1- Key References and Useful Websites)

Neglect	● Inadequate or inappropriate clothing

	● Appears underweight and unwell and seems constantly hungry ● Failure to thrive physically and appears tired and listless ● Dirty or unhygienic appearance ● Frequent unexplained absences from school ● Lack of parental supervision ● Unmanaged/untreated health/medical conditions ● Frequent absences, missing from education
Physical Abuse	● Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury ● Injuries in unexpected places or that are not typical of normal childhood injuries or accidents ● High frequency of injuries ● Parents seems unconcerned or fail to seek adequate medical treatment
Sexual Abuse	● Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development ● Sexual risk-taking behaviour including involvement in sexual exploitation/older boyfriend ● Continual, inappropriate or excessive masturbation ● Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy ● Unwillingness to undress for sports
Emotional Abuse	● Developmental delay ● Attachment difficulties with parents and others ● Withdrawal and low self-esteem ● Behavioural problems
Radicalisation	• Spending excessive amounts of time unsupervised using computers/the internet • Secretive behaviour • Expression of radical or harmful political views • Desensitised to violent, anti-social, extremist imagery • Isolated from others or sudden changes in friendship groups • Changes of religious views and/or commitment/devotion to religious cause (see Prevent Section of this policy)
Child Sexual Exploitation (CSE)	• Children who appear with unexplained gifts or new possessions; • Children who associate with other young people involved in exploitation; • Children who have older boyfriends or girlfriends; • Children who suffer from sexually transmitted infections and become pregnant; • Children who suffer from changes in emotional well-being; • Children who misuse drugs and alcohol; • Children who go missing for periods of time or regularly come home late; and

	• Children who regularly miss school or education or do not take part in education
Child Criminal Exploitation (CCE)	• children who appear with unexplained gifts or new possessions; • children who associate with other young people involved in exploitation; • children who suffer from changes in emotional well-being; • children who misuse drugs and alcohol; • children who go missing for periods of time or regularly come home late; and • children who regularly miss school or education or do not take part in education
"Honour-Based" Abuse (FGM)	● a female child is born to a woman who has undergone FGM; ● a female child has an older sibling or cousin who has undergone FGM; ● a girl or woman asks for help; ● a girl or woman confides in a professional that FGM has taken place; ● a mother/family member discloses that female child has had FGM; ● a family/child is already known to social services in relation to other safeguarding issues; ● a girl or woman has difficulty walking, sitting or standing or looks uncomfortable; ● a girl or woman finds it hard to sit still for long periods of time, and this was not a problem previously; ● a girl or woman spends longer than normal in the bathroom or toilet due to difficulties urinating; ● a girl spends long periods of time away from a classroom during the day with bladder or menstrual problems; ● a girl or woman has frequent urinary, menstrual or stomach problems; ● a girl avoids physical exercise or requires to be excused from physical education (PE) lessons without a GP's letter; ● there are prolonged or repeated absences from school or college (see 2015 guidance on Children Missing Education); ● increased emotional and psychological needs, for example withdrawal or depression, or significant change in behaviour; ● a girl or woman is reluctant to undergo any medical examinations; · a girl or woman asks for help, but is not be explicit about the problem; and/or ● girl talks about pain or discomfort between her legs.
"Honour-Based" Abuse (Forced Marriage)	● Persistent absence from school ● Request for extended leave of absence or failure to return from visits to country of origin ● Fear about forthcoming school holiday

	● Surveillance by siblings or cousins at school ● Decline in behaviour, engagement, performance or punctuality ● Poor exam results ● Pupil withdrawn from school by those with parental responsibility ● Removal from a day centre of a person with a physical or learning disability ● Pupil not allowed to attend extra-curricular activities ● Sudden announcement of engagement to a stranger ● Pupil prevented from going to higher/further education
"Honour-Based" Abuse (Breast ironing)	● A practice used to keep girls looking pre-pubescent by flattening breast buds in puberty, with the aim of reducing the risk of child marriage or sexual violence. Common in Cameroon with some evidence of up to 1000 cases in the UK. ● Use of heat, extreme heat, blunt force – can cause permanent and extreme harm
"Honour-Based" Abuse (Hazing type violence and rituals)	● Initiation ceremonies which involve activities that humiliate, degrade, abuse or endanger the person joining the group, regardless of a person's willingness to participate
Domestic Abuse	● See relevant paragraph above
Child on Child Abuse	● Any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations ● It may include, but is not limited to, sexual violence and sexual harassment ● It may take place face-to-face, online, and sometimes simultaneously between the two
Sharing of nudes or semi-nudes/Sexting	● See relevant paragraph above
Serious Violent Crime	● See relevant paragraph below
Upskirting	● The act of taking a sexually intrusive image up another person's skirt or under their clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear)

Identifying cases of female genital mutilation (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'.

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 the table above.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

They should use the non-emergency police number, 101, within 48 hours.

There are many different types of abuse but there are some that staff may be initially less aware of. Female genital mutilation (FGM) is a surprisingly common form of abuse in the UK, and the school does have measures in place to safeguard against this type of abuse. Any indications that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy. In support of this provision, the school will do everything that it can to ensure that:

- the school is an 'open environment', where students feel able to discuss issues that they may be facing;
- the Designated Safeguarding Lead (DSL) is aware of the issues surrounding FGM;
- materials explaining FGM and the issues that surround it are available for staff and students;
- advice and signposts are available for accessing additional help, e.g. the NSPCC's helpline, ChildLine services, and appropriate black and ethnic minority women's groups;
- girls have access to a private telephone, should they wish to use it;
- training about FGM is incorporated in the school's safeguarding training. Training will include:
    - an overview of FGM
    - the socio-cultural context
    - facts and figures
    - UK FGM and child protection law
    - FGM complications
    - examination of this policy – and what staff should do if they suspect FGM
    - the roles of different professionals

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- not to reveal to anyone other than the DSL that their enquires might be related to FGM, as this could increase risk to the pupil.
- not to engage initially with the pupil's parents or family, or others within the community;

- to alert the school's DSL to their concerns. The member of staff making the referral will then relay concerns directly to the police, which was made mandatory from October 2015. If a pupil has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the pupil's wishes.

Child-on-Child Abuse

Child-on-child abuse is recognised by the school as a form of abuse and is as serious as any other form of abuse. Staff should recognise that children are capable of abusing their peers, both within the school and outside it. It should never be tolerated or passed off as "banter", "having a laugh" or "part of growing up" (see also the Nudes and Semi-Nudes section above). It must not be regarded as an inevitable part of growing up as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

Forms of child-on-child abuse include, but are not limited to: bullying, cyberbullying, prejudice-based and discriminatory bullying, sexual violence, sexual harassment, sending abusive, harassing or misogynistic messages, physical abuse, financial abuse, gender related violence and consensual and non-consensual sharing of nude and semi-nude images and videos (youth-produced sexual imagery) or pornography to those who don't want to receive it. It can include hitting, kicking, biting, hair-pulling, shaking or otherwise causing physical harm. This may also include online or live grooming of pupils and sexual harassment (see part 5, KCSIE 2024). This could include being sexually touched/assaulted. Involvement in gangs or contact with gangs may also lead to various forms of child-on-child ranging from hazing and intimidation to violence, sexual abuse and exploitation, and coercion into criminal activity. It may take place face-to-face, online, and sometimes simultaneously between the two.

It can also take place within intimate partner relationships between peers, which is sometimes known as 'teenage relationship abuse'. It can also involve 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.

A new law makes particular acts of voyeurism, commonly known as 'up skirting', a criminal offence. Anyone of any age or gender may be a victim. KCSIE (2024) refers to up skirting as a specific example of abuse of a child by another child.

We recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Even if there are no reports, that doesn't mean that this type of abuse isn't happening.

We know it is likely to be complex and will require careful responses. When considering instances of harmful sexual behaviour between children, the school will consider their ages and stages of development.

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

- Embedding our RADIO toolkit which empowers all learners in establishing respectful relationships
- 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
- Ensuring our curriculum helps to educate pupils and encourage their use of their own voice about appropriate behaviour and consent through PSED, PSHEE, RSE, assemblies and workshops

- Ensuring pupils know how to report and that they can easily and confidently talk to staff by using the lines of communication in the pastoral team; training pupils in using our RADIO toolkit as a means of embedding Pupil Voice
- Ensuring pupils understand that staff realise, and will be sensitive to the fact, that disclosing can be embarrassing, worrying and pupils may be fearful of the consequences.
- Ensuring staff reassure victims that they are being taken seriously and that they will be supported.

We ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, sexual harassment or online sexual abuse it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns and that the DSL will follow local criteria for action and the local area protocol for assessments
- All actions and outcomes will be recorded on MyConcern
- How important it is to challenge abusive behaviours between peers

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

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

Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally), or simultaneously between the two

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers and flicking bras. Dismissing or tolerating such behaviours risks normalising them. Note that Upskirting is a specific criminal offence.
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Understanding that even if there are no reports, that doesn't mean this type of abuse isn't happening.
- Supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Understanding that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and we will offer them the appropriate support.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Staff are trained to be aware of what the signs of sexual harassment might appear to be and what the impact may be on a child. The procedures to be followed in the most serious of cases must follow the new guidelines 'Sexual Violence and Sexual Harassment between Children in Schools and Colleges' 2018 and in

KCSIE 2024 Part 5. It may be necessary to put structures in place to safeguard pupils who have made allegations against another pupil in school, as well as the pupil who is the subject of the allegation. The DSL, DDSLs and Headteacher will refer matters to the police when necessary and will also consult with the local authority and relevant agencies for support. Pupils are safeguarded against such experiences through the PSHE and PSED programmes in school, as well as on-going pastoral support. When considering instances of harmful sexual behaviour between children, the school will consider their ages and stages of development.
The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

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

Bulling and E-Safety/digital responsibility

Our policy on bullying is set out in a separate Policy (Anti-Bullying) and it acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying that leads to a child being at risk from harm is a safeguarding matter. Anti-bullying PSHEE lessons, assemblies and form periods take place each year and school council are involved.

The school seeks to minimise the risk of cyber bullying and online abuse by using forensic monitoring of pupils' use of school computers using firewalls and through the work of the e-safety committee. The school provides regular digital responsibility (e-safety) training for pupils, staff and parents at least once per year as part of the PSHEE programme and a regular digital responsibility (e-safety) talk for new parents at the start of each academic year.

All pupils and staff are required to read and sign our Acceptable Use Policy before they are allowed to access the school's computers. Pupils are required to lock away their phones and mobile devices during the school day. Priory 6 pupils are allowed to look at their phones at lunch time only, in the Priory 6 Common Room. Pupils in both the Preps, Pre-Preps and Senior phases of the school will be required to lock their personal computers/laptops away in lockers or the classroom when not in use, at the instruction of their form teachers. The school regularly advises parents to limit the amount of screen time their children have to two hours per night and to monitor their use of devices and the internet at home. See the Online Safety section for further information. Our Promoting good Behaviour Policy refers to searches and confiscation of devices if a disclosure includes an online element.

All of the above is designed to help children develop healthy relationships with technology, understand principles for managing digital risk and security, and build awareness about their duty to be responsible developers and consumers of technology.

Procedures for dealing with Child-on-child abuse

We have a zero-tolerance approach to child-on-child abuse. We acknowledge that even where there are no reported cases of child-on-child abuse, this does not mean it is not happening. Most cases of pupils hurting

other pupils will be dealt with under our school's behaviour policy and following guidance in KCSIE, 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, up skirting or sexually inappropriate pictures or videos (including sexting)

Procedures for dealing with child-on-child abuse are the same as for other types of abuse and staff who become aware of child-on-child abuse should immediately refer the matter to the relevant DSL/DDSL who will decide the best course of action. Depending on the nature and the severity of the abuse, staff may refer the matter directly to the police and/or Local Children's Services. In that case they should then discuss the matter with the DSL/DDSL.

a) Listen to the child and ascertain the seriousness of the situation. The Form Teacher or Head of Year will refer the matter to the DSL/DDSL. Do not be judgemental, listen carefully, only record the facts as the child presents them.
b) A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.
c) Bullying can be very subtle and staff should be aware of problems that can arise with older pupils misusing their power over younger pupils, as well as pupils of the same age and pupils with a dominant character. Please refer to the Policy - Anti-Bullying but all serious cases of bullying must be referred to the Headteacher.
d) Staff are made aware that child-on-child abuse can be a safeguarding concern when a child is at risk as a consequence.
e) Staff should reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
f) 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.
g) 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.
h) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
i) Staff need to consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
j) Staff should remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Important considerations:

- The wishes of the victim.

- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children;
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and
- Other related issues and wider context (contextual safeguarding)
- The fact that some children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will need appropriate support offered to them.

Prevent:

The national Prevent Strategy aims to stop people becoming terrorists or supporting terrorism. St Augustine's Priory, seeks to play a key role in ensuring that the children and young people who attend the school are safe from the threat of terrorism. Prevent is part of the school's wider responsibility for Safeguarding and this policy is therefore linked to the school's Policy for Safeguarding and Child Protection.

The Prevent strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives, including non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Government's Prevent Strategy defines extremism as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.'

We believe that St Augustine's Priory should be a safe place where children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge such ideas.

In order to fulfil our Prevent Duty, we undertake to do the following:

- Actively promote Fundamental British Values, including mutual respect, tolerance and democratic participation, as part of our wider SMSC/ PSHEE programmes as well as within other subject areas and assemblies;
- Seek support and resources from the Educate Against Hate website.
- Respect learner and staff diversity, encouraging freedom and openness;
- Assess the risk of children in our schools/ settings/ activities being drawn in to terrorism;
- Maintain robust safeguarding policies which take in to account the policies and procedures set out by Ealing Safeguarding Children Partnership and identify extremism/ radicalisation as issues to be reported promptly to the Staff lead;
- Identify a nominated Staff Lead, usually the DSL (Assistant Head);
- Train staff so that they have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism; and to ensure that the DSL has had higher level training in Ealing Safeguarding Children Partnership's Prevent Strategy;
- Safer Recruitment procedures are followed with a regard to this duty and policy;
- Conduct due diligence checks on groups/ individuals seeking to hire or use school premises;
- Conduct due diligence checks on visitors to school, particularly visiting speakers and clergy, whether invited by children or staff;

- Visiting speakers may be required to provide a resume of their talk in advance and are required to sign our Visitors Safeguarding information and form on arrival, to wear a visitor's lanyard and are to be accompanied at all times on the school site unless they have completed a DBS check for St Augustine's Priory school;
- Conduct due diligence checks on contractors working on the school sites who might have access to pupils;
- Ensure children are safe from terrorist and extremist material when accessing the internet in school;
- Review our policies annually;
- Directly challenge unacceptable views and ideologies when they are manifested in a timely and appropriate manner;
- Refer relevant individuals to Ealing Safeguarding Children Partnership and Ealing Channel services where necessary and appropriate;
- Seek advice about such referrals from Ealing's Prevent Officer.

Possible Indicators of Risk

- Racist graffiti/ symbols/ comments made in school;
- Speaking out or writing in favour of extremist ideas in school work or lessons or any school organised event;
- Extreme comments shared on social media;
- Distribution of extreme or terrorist propaganda among other pupils;
- Vulnerable students being influenced by others (although we are aware of a need to avoid over-simplified assessments of who might be 'vulnerable'), because of the existence of one or more factors, which may include:
  - An identity crisis, involving an individual's distance from their cultural/ religious heritage, including peer / family/ faith group rejection;
  - A personal crisis, including family tension/ social isolation/ friendship issues;
  - Personal circumstances, such as migration, experience of racism;
  - Unmet aspirations;
  - Criminality;
  - Experience of poverty, disadvantage, discrimination or social exclusion;
- Association with those known to be involved in extremism (including via the internet);
- A significant shift in the child/ young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group;
- Travel for extended periods of time to international locations known to be associated with extremism;
- Disguising of a child's identity, e.g. in documentation;
- A simplistic or flawed understanding of religious/ political/ global issues;
- A significant adult or other in the child/ young person's life who has extremist views or sympathies particularly family members;
- Critical risk factors, being:
  - Contact with extremist recruiters;
  - Articulation of support for extremist causes/ leaders;
  - The possession of extremist literature;
  - Using extremist narratives and a global ideology to explain personal disadvantage;
  - Justifying the use of violence to solve societal issues;
  - Membership of extremist organisations.

Supportive Interventions

- Channel is the multi-agency approach to protect people at risk from radicalisation and aims to: identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk; develop the most appropriate support plan for the individuals concerned.
- Staff should inform the DSL as soon as possible if they make a referral to local authority children's social care about any extremism concerns.
- Should concerns require additional support from other agencies, the following are ways in which terrorism and extremism can be reported:
  - Anti-terrorist hotline: 0800 789 321
  - Crime stoppers: 0800 555 111
  - Relevant police force: 101
  - www.gov.uk/report-suspicious-activity-to-mi5
  - Channel DfE Helpline 020 7340 7264
- To report any online terrorist-related material: www.gov.uk/report-terrorism

Serious Violent Crime

All staff need to be alert to indicators that may signal that children are at risk from, or involved with, serious violent crime:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Online Safety, including digital responsibility

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors that are reviewed annually
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Use of school communications to reinforce the importance of children being safe online
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures and systems with them so they know how to raise concerns about online safety including the sites they will be asked to access and who their child is going to be interacting with online
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones. Phones will be immediately confiscated and a detention will be issued.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems both in school and at home when logged into the school account.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Resources that could support schools include:

• Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
• Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography
• Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
• PSHE association provides guidance to schools on developing their PSHE curriculum
• Teaching online safety in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
• Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources https://www.ceopeducation.co.uk/
• UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

Personal devices at St Augustine's Priory

- Pupils from Year 3) to Year 13 will need access to a Chromebook or a laptop. The device must have an attached keyboard so iPads and tablets are not advised for the new academic year. Preps and Pre-Preps will need their devices on specific days and Seniors and Priory 6 will need their devices in school every day. This approach ensures that our pupils maintain the IT skills they have developed in the last few months as well as providing the flexibility for running the ambitious programme we have already established. We will continue to offer appropriate training for our pupils. YONDR pouches are issued to all pupils in Year 7-11 for storing mobile phones during the day.

Protecting children through Forensic Monitoring and the Acceptable Use Policy

At St Augustine's Priory we are doing all that we reasonably can to limit children's exposure to online risks from the school's IT system, especially with more pupils using devices more regularly. As part of this process, we have appropriate filters and monitoring systems in place.
Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. We have a clear policy on the use of mobile technology in the school, in the form of our Acceptable Use Policy. Staff will monitor where reasonably possible, but it is the parent/guardians responsibility to ensure their child is safe outside school hours and during holidays.

Opportunities to teach safeguarding

- Governing bodies and proprietors should ensure that children are taught about safeguarding ensuring online safety is a running and interrelated theme so that they become digitally responsible learners for the 4th Industrial Revolution. We consider this as part of providing a broad and balanced curriculum.

- This includes covering relevant issues through 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 is compulsory from September 2020. We recognise that RSHE has a crucial role in preventative education.
  The following statutory guidance is referred to in our RSE Policy:
  Statutory guidance: relationships education relationships and sex education (RSE) and health education.
  The following resources may help schools:
  • DfE advice for schools: teaching online safety in schools
  • UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected world
  • National Crime Agency's CEOP education programme: www.thinkuknow.org.uk
  • Public Health England: Rise Above 95.

We are careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding. To that end we use regular training from Forensic Monitors to maintain emerging best practice and trends.

Use of School Facilities

Should the school receive an allegation relating to an incident that took place on the school grounds. Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO. (Paragraph 377 - KCSIE 2024)

The Management of Historical Abuse

The school will inform the Police about any allegations of historical abuse at the earliest opportunity. Historical abuse (also known as non-recent abuse) is an allegation of negligence, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years of age,

Any records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and for 75 years after leaving school.

When a child makes a disclosure:

Do the following:

- Act immediately. Listen to them. Allow them time to talk freely and do 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.
- Explain what will happen next and that you will have to pass this information on.
- Write up your conversation as soon as possible in the child's own words and stick to the facts.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

Do not:

- Ask leading questions
- Tell them they should have told you sooner
- Use your own words to describe events, or put your own judgement on it
- Investigate
- Promise secrecy or confidentiality
- Discuss with anyone other than the relevant DSL/DDSL/Children's Services/police. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

Process and Participation, including referrals:

The school acknowledges the requirement to differentiate between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. The former will be reported to Children's Social Care immediately; the latter will lead to multi-agency assessment using local processes. At all times we work hard to ensure the participation of all stakeholders. We are always learning.

If a member of staff has concerns about a child:

a) They should immediately consult the DSL/DDSL **and** complete a MyConcern entry.
b) The DSL/DDSL will assemble all that is known about the child from school records and other staff, and will check the MyConcern/safeguarding chronology for this child where appropriate. We know that chronologies save lives and will be careful in making sure we triangulate our knowledge of what it is like to be that child.
c) The DSL/DDSL will report to Ealing Social Care on 0208 825 8000 (or the child's home Local Authority Social Care) or will support any staff who make a referral. This will be done within 24 hours or one working day.
d) The procedures to be followed are shown in Appendix 3 which are in accordance with the Ealing Safeguarding Children Guidance 2014, Policy & Procedures and include procedures for dealing with abuse by one or more pupils against another pupil where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Any such abuse will be referred to local agencies.
e) If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
f) The DSL will contact the police if a crime has been committed within 24 hours or one working day.

When deciding whether to make a referral, the DSL/DDSLs will discuss the matter with Social Services where it is not clear whether the thresholds have been met. This may be done without giving names in the first instance. Staff should be aware that an allegation of child abuse or neglect may lead to a criminal

investigation, thus the school should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegation of abuse. The DSL/DDSLs will ensure that the procedures recognise the difference between those who have suffered or who are at risk of suffering serious harm and those who need additional support from one or more agencies.

Partnership with Children

a) The DSL/DDSLs will take the lead in all early help strategies and any processes that follow.
b) Children are supported by strong pastoral systems and monitoring. These structures include fortnightly Head of Year Committee meetings and weekly Preps and Pre-Preps team meetings. Form teachers are trained annually at INSET and in the Seniors meet with their Head of Year fortnightly. Prep and Pre-Prep Form Teachers and Teaching Assistants have extensive pastoral contact through teaching their pupils. Form teachers meet with pupils twice a day in the Seniors and throughout the day with Pre-Prep pupils.
c) Central monitoring documents are maintained, reviewed and shared. The DSLs monitor vulnerable pupils lists and liaise closely with the SENDCO and the Learning Support staff.
d) The school has an onsite Specialist Mental Health Lead who is a trained counsellor.. Pupils can attend drop in sessions at lunchtimes (typically Senior pupils). Children can be referred members of the pastoral team. The School Counsellor meets once per half term with the DSL & Deputy Head (Pastoral) or more frequently if a case requires this.
e) The School Nurse offers advice and support to pupils across the school and liaises closely with the DSL/DDSLs. The school's pastoral Assistant acts as a mentor in particular for inclusion, diversity and Equity matters.
f) There is very strong culture of shared support and advice for parents through workshops, parents' meetings, SEN and EAL review meetings and ad hoc meetings when concerns arise.
g) All staff, both teaching and support staff, are proactive with sharing information and concerns about pupils and demonstrating care for these pupils.
h) Where necessary, Wellness Plans are agreed between children, their families and the school to offer support and guidance.

Partnerships with Pupils once a referral has been made

a) We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self -blame.
b) We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
c) Children will be told as far as possible what is happening because we understand the impact a disclosure can have on a whole family.
d) We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to behaviour which could be regarded as aggressive or withdrawn.
e) Our school will support all pupils by:

- Providing many means of acting on Pupil Voice;
- encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying;
- promoting a caring, safe and positive environment within the school; this includes clear guidance for those engaged in specialist music or sports provision and arrangements for changing from nursery through to Sixth Form;
- liaising and working together with all other support services and those agencies involved in the safeguarding of children;

- notifying Social Services as soon as there is a concern; within 24 hours of a disclosure or suspicion of abuse;
- following up with a written referral within 48 hours;
- providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school.

f) If staff have concerns that the DSL/DDSL has not responded to safeguarding concerns they may make a referral themselves. In such cases they are asked to inform the DSL and Headteacher that they have done so.

g) If there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' any such abuse will be referred to local agencies. It is an expectation that in the event of disclosures about pupil on pupil abuse that all children involved, whether perpetrator or victim, are treated as being "at risk".

Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

*Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

* Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

* The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

* Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes: one-to-one support with specialists from the SEND department; additional support with speech and language; peer mentoring; additional pastoral support from form teacher, Head of Year or pastoral assistant or any other bespoke support where reasonable to meet the individual's needs. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Partnership with looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained governor, James Davies, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

Partnership with Staff

a) We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
b) We will support such staff by providing an opportunity to talk through their anxieties with the Headteacher and/or the DSL/DDSLs, and to seek further support as appropriate.
c) The DSL/DDSL will be given sufficient time, funding, supervision and support to fulfil his/her child welfare and safeguarding responsibilities effectively.

Partnership with Parents/Carers

a) Where appropriate the DSL/DDSL will work transparently with parents/carers about a referral.
b) Where appropriate the DSL/DDSLs will be able to recommend sources of specialist support to parents/carers, e.g. Ealing SAFE, parenting classes, DV support teams, substance misuse support clinics, and referrals to family psychotherapists.
c) Workshops for parents/carers on a variety of pertinent issues are held each year e.g. drug abuse, parent conversations, e-safety, and so on.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

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. The school keeps a photocopy of each transferred file and retains this until the child reaches 25 years old (seven years after they reach the school leaving age). We hold a copy of safeguarding records of all pupils, regardless of which year group they are in when they leave the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for 75 years.

When the retention period finishes, confidential records will be shredded in the presence of the DSL (or DDSL in her absence) and all electronic versions of the record must be purged.

Confidentiality

a) We recognise that all matters relating to Child Protection are confidential.
b) The Designated Safeguarding Lead (or Headteacher in her absence) will disclose any information about a pupil to other members of staff on a need to know basis only.
c) All staff must be aware that they have a professional responsibility to share information in a timely and appropriate manner with other agencies in order to safeguard children.
d) All staff must be aware that they cannot promise a child to keep secrets as this may not be in the child's best interests. Nor must staff 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
e) If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:

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

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

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

f) Regarding anonymity, all staff will:

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

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

g) 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.

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

i) 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.

j) 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.

k) If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

Transferring Records

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.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily 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.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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 as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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.

Allegations and Safeguarding Concerns against Staff, including Supply Staff, DSL/DDSLs, Headteacher, Volunteers and Contractors

This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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 - this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

a) We understand that a pupil may make an allegation or have a safeguarding concern against a member of staff, the Headteacher, a DSL/DDSL, supply staff, volunteer or contractor. The school will ensure there is a follow up for children and families who have made an allegation of abuse against staff. Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.
b) If any allegation is made against a member of staff, the Headteacher, a DSL/DDSL, supply staff, volunteer or contractor, the LSCP procedures will be followed and we shall have regard to the guidelines on practice and procedures given in Part 4 of Keeping Children Safe in Education 2024 (KCSIE) (see Appendix 1- Key References and Useful Websites). Where the allegation is made against supply staff, allegations must be dealt with using the LSCP procedures. The school cannot simply cease to use the supply staff.
c) A clear priority of the school will be to enable a quick and confidential resolution of the allegation to the benefit of all concerned. We will balance our duty of care to staff with our duty of care to pupils, and all parties will be carefully supported during and after the allegation.
d) If such an allegation is made, the member of staff (including supply staff) or volunteer/contractor receiving the allegation will immediately inform the Headteacher, or in her absence, the allegation should be reported to the Chair of Governors. The school will not conduct its own investigation without consulting the designated officer/LADO.
e) If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors, without telling the Headteacher. The Chair of Governors will immediately consult with the Local Authority Designated Officer (LADO) or their deputy, within one working day.
f) Where there is a conflict of interest in reporting a concern or allegation about a member of staff

(including a supply teacher, volunteer or contractor) to the Headteacher, it must be reported directly to the local authority designated officer (LADO).

g) If an allegation is made directly to The Headteacher or Chair of Governors, on all such occasions they will immediately (within one working day) discuss the content of the allegation with the Local Authority Designated Officer (LADO) or their deputy. In an emergency the police should also be called. In borderline cases, discussions with the LADO will be held informally and without naming the school or individual. GDPR cannot stand in the way of safeguarding children.
h) The Headteacher or Chair of Governors ('the case manager') will record in writing any information about dates, times, location and potential witnesses and the date and time of contact with the LADO. The nature, context and content of the allegation will be considered, with reference to whether the person may pose a risk of harm. A course of action will be agreed with the LADO about communication with the individual subject to the allegation, and communication with the parents (see Part 4 KCSIE 2024). Where a strategy discussion is required or when the police or children's social care are involved, the individual subject to the allegation may not be informed by the case manager until those agencies have been consulted.
i) An individual will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the school and the individual and the parents of the child/children as agreed. The school will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The school will give due weight to the views of the LADO, *KCSIE*, *WT* and to the policy when making a decision about suspension. See below for more details.
j) A named contact will be provided for colleagues who have been suspended, appointed by the case manager. Staff should be given access to counselling advice and advised to contact their trade union or a colleague for a support. Further guidelines about contact with colleagues and support are in Part 4 of KCSIE 2024.
k) If, following discussion, the LADO determines that the allegation does not reach the threshold for referral to Social Services then the Headteacher or the Chair of Governors will follow all necessary internal procedures and complete a record which will be retained and refer back to LADO if any further concerns.
l) If an accusation is made against a member of staff living on school premises (e.g. the Headteacher, the Estates Manager), alternative accommodation may need to be found in the event that an investigation takes place and for the duration of the investigation.
m) If, following discussion, the LADO determines that the allegation reaches the threshold for referral then investigations will involve:
    a. Social Services
    b. Police
n) In cases of serious harm or risk, the police should be informed from the outset.
o) The police should also be contacted in cases of historical allegations of abuse.
p) If the person against whom the allegation has been made has left, the police should be contacted.
q) Investigations should use the definitions outlined in Part 4 of KCSIE 2024 when determining the outcome; i.e.: substantiated, malicious, false, unsubstantiated or unfounded (see definitions below).
r) If abuse is reported, in addition to investigating the allegation, a social services inspection will decide:
    a. to what degree the school did or did not safeguard and promote the welfare of the child
    b. decide whether the school acted appropriately according to Child Protection Procedures
    c. decide what lessons may be learned from the experience.
s) A referral will be made to the DBS if an allegation is substantiated and it is thought that the individual has or may have engaged in conduct that has harmed or is likely to harm a child, or that they might pose a risk of harm to a child.

t) A referral will also be made to the TRA (Teachers Regulation Authority) – see below for more information.
u) If an allegation is not substantiated and the person returns to work, the school will support the person.
v) The Headteacher will keep a written record of all allegations. Details of allegations that are found to have been malicious should be removed from personnel records. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached the normal pension age or for 10 years from the date of the allegation if it is longer.
w) Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The school should therefore consider whether to apply an appropriate sanction (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).
x) As the school takes children aged three and above, it is not a registered provider for EYFS so there is no requirement to inform Ofsted of allegations or investigations.
y) The procedure to be followed is shown in Appendix 5 which is in accordance with the Ealing Child Protection Policy & Procedures 2014.
z) The school will make every effort to act in a timely manner, to maintain confidentiality and to guard against unwanted publicity.

Low-Level Concerns – see Low Level Concern Policy for more detail.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the 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 designated officer at the local authority

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

- Being overly 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
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns as per this policy
- Ensuring that staff can share low-level concerns confidentially
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Regularly refreshing staff training in Safer Working Practices and the Staff Code of Conduct

Responding to low-level concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

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

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

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

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described above, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified. The rationale for all decisions and actions taken must be recorded.

References

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

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

  See Low Level Concerns Policy for more detail.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the London Borough of Ealing.

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

Definitions for outcomes of allegation investigations

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

Concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Referral to the DBS & TRA

If anyone who is employed, contracted, a volunteer or a member of staff or student working in the school is deemed unsuitable to work with children, and thus their services are no longer required, the Headteacher will report to the Disclosure and Barring Service (DBS) within one month of that person leaving the school and inform the Chair of Governors. Any such report will include evidence about the circumstances as far as possible. If the referral relates to the Headteacher, the Chair of Governors is responsible for making this referral. The contact address is DBS, PO Box 181, Darlington DL1 9FA (tel 0300 123 1111). The school is aware that failure to make a report constitutes an offence, leading to its possible removal from the Department for Education register of Independent Schools. "Compromise agreements" cannot apply in this connection. It is an offence not to refer to the DBS details of anyone who is removed from regulated activity, or who leaves while under investigation for allegedly causing harm or posing a risk of harm.

Referrals to the DBS will be made by the school, as a legal duty, for anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult according to the terms set out in para 53 of KCSIE 2024.

The school will consider referring to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate and should make reference to this in their policies. The reason such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction at any time, for a relevant offence".

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

Safer Recruitment and Employment Practices

St Augustine's Priory follows the Government's recommendations for Keeping Children Safe in Education 2024 (KCSIE). (See Appendix 1- Key References and Useful Websites)

All members of teaching and non-teaching staff, governors, including part time staff, temporary and supply staff and visiting staff such as music teachers and volunteers are subjected to a Disclosure and Barring Service (DBS) check and all other required suitability checks before starting work, to ensure their suitability to work with children. Additional checks are carried out on staff/people who have lived or worked outside the UK using the TRA Teacher Services Systems.

Each person that is appointed will need to sign a self-declaration regarding Disqualification from childcare, before the appointment is confirmed.

Confirmation of DBS status from supply agencies and external organisations is received prior to commencing work. Further identification checks are carried out on arrival at school.

The Headteacher, the DSL, the DDSLs and at least one member of the Governing Body have completed the NSPCC online training in Safer Recruitment or local authority training as a minimum.

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

All recruitment will be planned to ensure that candidates know that St Augustine's Priory is fully committed to safeguarding the children in our care. Interview questions will ensure that a candidate has secure safeguarding knowledge and realises the centrality of safeguarding at the school. This will deter unsuitable people from applying to work in our School. The school conducts checks to ensure that no member of staff carries out work at school, or intends to do so, in contravention of a prohibition order, or any direction made under section 128 of the 2008 Act that they may not take part in the management of an independent school (paragraph 18920(b)) and in accordance with EYFS regulations.

Further information can be obtained in the school's 'Statement of Policy and Practice: Recruitment'.

The Single Central Register

a) The Headteacher, all members of staff, peripatetic staff, and governors are subject to enhanced DBS clearance and all other required suitability checks. Identity checks include sight of passport, qualifications, utility bill, bank statement and driving licence. Records of identity are kept in the individual's personnel file in a locked cabinet in the Bursar's office.
b) DBS checklists are housed centrally and securely in the Bursar's office.
c) There is a single central register of all staff, supply staff and includes Governors and other volunteers. This is maintained on a day to day basis by the HR manager and is retained in the Bursary. The overall responsibility for ensuring that it is maintained correctly lies with the Headteacher who will, with the Chair of Governors, review the SCR at the beginning of each term and each month with a DSL/DDSL. The Headteacher meets weekly with those involved in recruitment to ensure that constant monitoring is in place.

Whistleblowing (protected disclosure)

a) We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
b) All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. (See separate Whistleblowing Policy).
c) All staff should be aware of the duty to persist with a concern until they are satisfied that the safeguarding needs of the child are being met. This duty may require reporting directly to other agencies such as the Ealing Safeguarding Children Partnership.

Physical Intervention

a) Corporal punishment of any kind is not allowed in the school. Our policy on physical intervention by staff is set out in a separate policy (See separate Policy - Promoting Good Behaviour) and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times, it must be the minimum force reasonably necessary to prevent injury to another person.
b) We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. (See separate Policy - Promoting Good Behaviour).
c) It may be necessary to draw up particular behaviour plans to anticipate and avoid as much as possible the need for reasonable force when managing pupils with particular medical, SEND or physical needs.

Health & Safety

Our Health & Safety Policy reflects the consideration we give to the Safeguarding and protection of our children both within the school environment and when away from the school when undertaking school trips and visits. (Health and Safety Policy and Risk Assessment).

APPENDIX 1: Key References and Useful Websites

- Prevent Duty Guidance: for England and Wales (July 2015) (Updated 2023)(*Prevent*), incorporating The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015), and The Use of Social Media for On-line Radicalisation (July 2015). RSHE 2019
- The Education Act 2002 http://www.legislation.gov.uk/ukpga/2002/32/contents
- Education (Independent School Standards) (England) Regulations 2014 www.legislation.gov.uk/uksi/2010/1997
- Safeguarding Vulnerable Groups Act 2006 http://www.legislation.gov.uk/ukpga/2006/47/contents
- The Children Act 2004 http://www.legislation.gov.uk/ukpga/2004/31/contents
- What to do if you are worried a Child is being Abused (March 2015) https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- Working together to Safeguard Children DfE (September 2023 – https://www.education.gov.uk/publications/standard/publicationDetail/Page1/DFE-00030-2013 Working together to safeguard children 2023: statutory guidance (publishing.service.gov.uk)
- Keeping Children Safe in Education (September 2024) (KCSIE) which also incorporates Disqualification Under the Childcare Act 2006 (Feb 2015)
- The National Crime Agency's CEOP Education team aim to help protect children and young people from online child sexual abuse https://www.ceopeducation.co.uk/
- The use of social media for on-line radicalisation (DfE) https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation
- Promoting the Education of looked after and previously looked after children https://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children
- SEND Code of Practice 0-25 years (2015) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf
- Mental Health and behaviour in schools (November 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf
- Counselling in schools: a blueprint for the future (February 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf
- UK Safer Internet Centre: appropriate filtering and monitoring https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring
- UK Council for Internet Safety https://www.gov.uk/government/organisations/uk-council-for-internet-safety
- The use of social media for on-line radicalisation (DfE)
- Sexting in Schools – UK Council for Child Internet Safety (UKCCIS): Sexting in schools and colleges
- Searching, screening and confiscation – DfE (January 2018)
- Information sharing advice for safeguarding practitioners https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
- Statutory Framework for the Early Years Foundation Stage – September 2021 https://www.gov.uk/government/publications/safeguarding-children-and-protecting-professionals-in-early-years-settings-online-safety-considerations
- https://www.ncsc.gov.uk/guidance/early-years-practitioners-using-cyber-security-to-protect-your-settings
- London Safeguarding Children Procedures and Practice Guidance https://www.londonsafeguardingchildrenprocedures.co.uk/
- Multi-agency statutory guidance on FGM (April 2016) https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O__Leaflet_A4_FINAL_080321_WEB.pdf
- Multi-agency guidelines: Handling cases of Forced Marriage (June 2014) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf
- Preventing and Tackling Bullying – Advice for Headteachers, staff and governing bodies. DfE July 2017
- Children and Social Work Act 2017

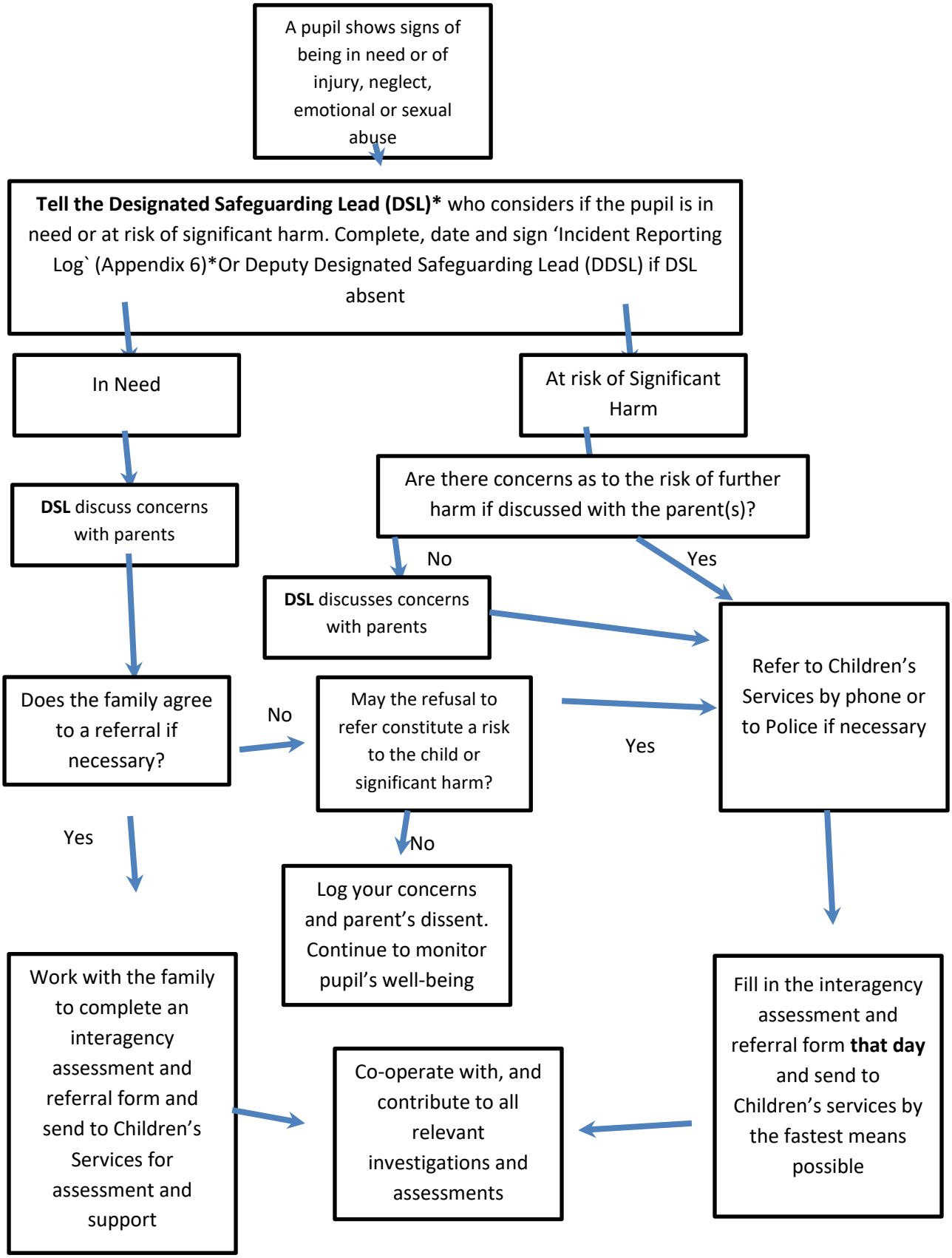
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)
- Educate Against Hate
- Harmful Sexual Behaviour Support Service for the children's workforce. 8 am – 8 pm Tel: 0344 2250623 – hsbsupport@swgfl.org.uk

APPENDIX 2: Associated Policies and Procedures

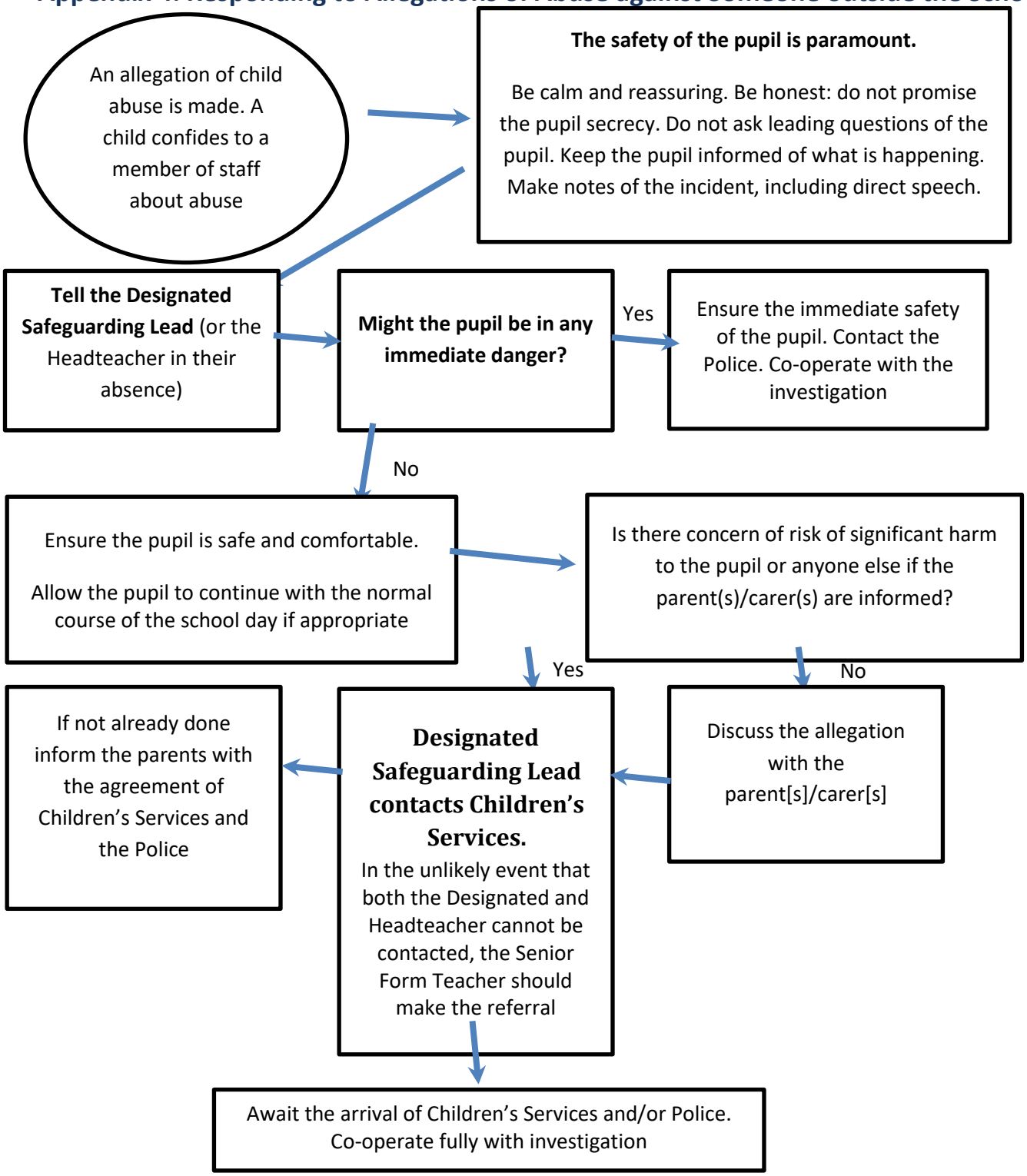
This is a list of some of the related policies and procedures, it is not exhaustive.

- Annex 1 and 2 to existing Safeguarding policy dealing with Covid-19
- Safeguarding during Remote Teaching and Learning Policy
- Promoting Good Behaviour Policy (including rewards, sanctions, physical restraint, dealing with bullying)
- Staff Code of Conduct
- Anti-Bullying Policy
- Drugs Education Policy
- Whistleblowing (protected disclosure) see Employment Manual
- Health & Safety Policy
- Risk Assessment
- Missing Child Policy (includes EYFS)
- EYFS Uncollected Child Policy
- EYFS Outings Policy
- EYFS Personal Care Policy
- EYFS Behaviour Policy
- EYFS Camera, Mobile Phone and other Digital Devices Policy (see Appendix 7)
- Guidance for Staff in Safeguarding
- Pupils with Special Education Needs and Disabilities Policy
- Safer Recruitment procedures in Recruitment Policy
- Employment Manual
- ICT - Acceptable Use Policy
- First Aid Policy
- Administration of Medicines Policy
- E-Safety Policy
- PSHEE Policy
- Supervision of Pupils Policy
- Visiting Speaker Policy
- RSE Policy
- Low-Level Concerns Policy

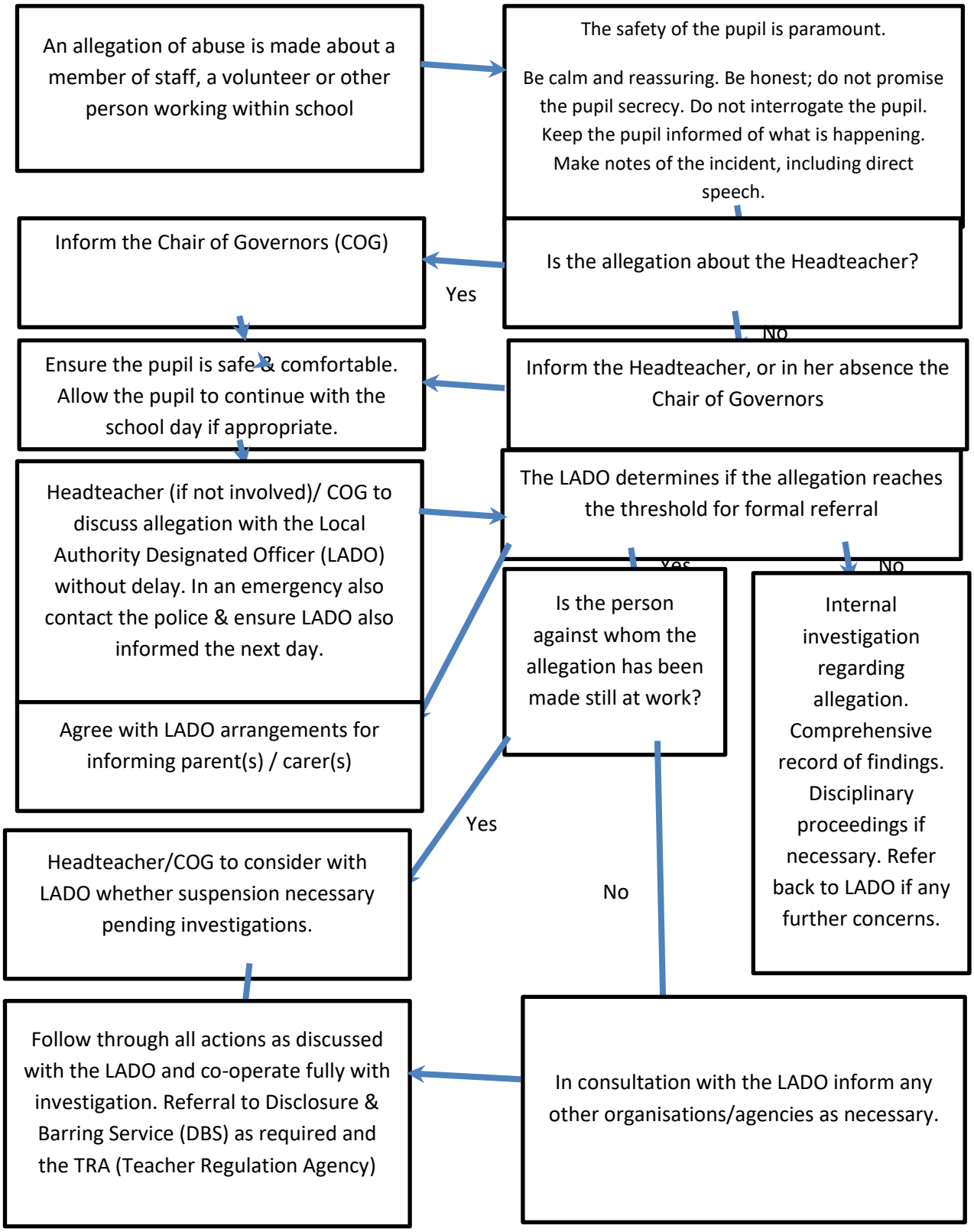
Appendix 3. Responding to a Pupil in Need and to Signs of Abuse



Appendix 4. Responding to Allegations of Abuse against Someone outside the School



Appendix 5. Dealing with an Allegation of Child Abuse against an Employee, Supply Staff, Contractor, Volunteer or any other Person Working in the School



Appendix 6. Complex Family Cases and the School's Response

Sometimes families experience complex situations where children can be caught in the middle of conflict and family tension. Such cases include, but are not limited to:

*separation and divorce

*parental alienation

*mental health issues

*drugs and alcohol

*domestic violence

As a school, we will work in partnership with all parties in a neutral way to ensure that we listen to the voice of the child/children and put their needs first. We may create Welfare Plans, offer school counselling or signpost families to private therapists, suggest working with external agencies as part of our Early Help provision or liaise with other agencies where appropriate. It will be for the school, on a case-by-case basis, to consider the level of information (if any) that is provided to parents where referrals have been made to children's social care.

Staff will be trained on how to deal with the above complex family situations in line with regular safeguarding training.

Staff must treat all parents equally, unless a court order limits a parent's ability to make educational decisions, participate in school life or receive information about their children.

In the cases of a court order, we will adhere to the court order and support the child/children throughout the process.

Where a parent's action, or proposed action, conflicts with the school's ability to act in the child's best interests, we will try to resolve the problem with that parent but avoid becoming involved in conflict. However, there may be occasions when we need to decline requests for action from one or more parents.

The welfare of the child must be the paramount consideration for schools. In the event of a concern being raised where the school is unclear how to act, independent legal advice will be sought to ensure that a parent's rights and responsibilities are not infringed and the actions of the school are compliant with education law.

We will also use the following document when dealing with complex family situations:
https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility

Appendix 7. Use of Mobiles, Cameras and other Digital Devices in the EYFS

This policy applies to all Staff, Supply Staff and Visitors to the Early Years Foundation Stage (EYFS).

i. Staff should only use photographic equipment, including cameras, iPad and mobile phones as guided by these criteria.
ii. Any school device e.g. iPad that is used for assessment purposes and to store photographs and taken off site, must be security locked by a password. Passwords must be confidential.
iii. Staff mobile phones are to be kept out of sight of children and used at times when the member of staff is not responsible for children, in designated areas of the school.
iv. Photographic equipment will be designated for work related purposes only. The use of personal photographic equipment is to be avoided. Should it be considered that such use is not to be precluded for a given reason, explicit authorisation must be obtained from the Designated Safeguarding Lead.
v. Images of children and young people must only be taken when they are in suitable dress. In no circumstances are images to be taken of children or young people in any state of undress. Should children and young people be participating in sporting activities, careful consideration must be taken to the appropriateness of taking such images, in particular the angle of which shots may be taken. In no circumstances are photos to be taken in the cloakroom area. Published photos of pupils swimming are only to show above the waist.
vi. The DSL must reserve the right to view any images taken and/or to withdraw or modify an individual's authorisation to take or make images at any time. Staff must ensure that all images are available for scrutiny and to be able to justify any images in their possession.
vii. On admission to the school all parents complete a parent contract, stating whether their child can or cannot be included in photographs.
viii. Staff must not use their mobile phones during working hours, and these must be stored securely in staff bags out of sight. They must not receive or make calls on their mobile phones during lessons.

Appendix 8. Low Level Concerns Policy and Form

To be read in conjunction with the Safeguarding Policy

1. Introduction

At St Augustine's Priory, we take safeguarding very seriously. This includes ensuring that all adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. We set out to create and embed a culture of honesty and transparency in which the school's values and expected behaviour which is set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff. Being able to report low level concerns, or indeed to self-report if a mistake has been made is an important part of that culture. Adults must model safe relationships and must adhere to the school's safer working practices. These make sure that everyone in our community is safe.

This policy builds on learning from best practice across the world and sets out the detail and processes for staff regarding low-level concerns they may have. We are a community where we constantly reinforce the importance of being a telling school, our school motto is Veritas, our culture embeds feedback from a variety of sources like the Wellbeing Committee to show that we are an open and listening school. SLT have an open-door policy.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but which nevertheless is concerning. A member of staff who has a concern about another member of staff should inform the Head about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead. Members of staff have the right to remain anonymous as far as reasonably possible.

3. Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024

431. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

432. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What a low-level concern is

433. The term 'low-level' concern does not mean that it is insignificant. 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 or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not 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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

434. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

435. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

436. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Staff code of conduct and safeguarding policies

437. As good practice governing bodies and proprietors should set out their low-level concerns policy within their staff code of conduct and safeguarding and child protection policies as set out in Part two of this guidance. They should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e., to create and embed a culture of openness, trust and transparency in which the school or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

438. As set out in Part two of this guidance, the governing body or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

439. Schools and colleges can achieve the purpose of their low-level concerns policy by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)

- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system.

Sharing low-level concerns

440. Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.

441. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

442. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

443. Schools and colleges should ensure they create an environment where staff are encouraged and 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.

Recording low-level concerns

444. All low-level concerns should be recorded in writing. 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.

445. Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

446. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to

occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

447. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

References

448. Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Responding to low-level concerns

449. The school or college low-level concerns policy should set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the headteacher/principal (or a nominated deputy) should collect as much evidence as possible by speaking:

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

450. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

451. A good low-level concerns policy will simply be a reflection and extension of the school or college's wider staff behaviour policy/code of conduct.

452. More detailed guidance and case studies on low-level concerns can be found in: Developing and implementing a low-level concerns policy: a guide for organisations which work with children (farrer.co.uk).

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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 they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

5. Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the Headteacher. This will be done in accordance with the Data Protection Act 2018 and UK GDPR.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

Reports about supply staff and contractors will be notified by the Headteacher to their employers so any potential patterns of inappropriate behaviour can be identified.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave St Augustine's Priory, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

6. Process to follow when a Low-Level Concern is raised

Do not discuss with another colleague. Complete the LLC form and return it to the Headteacher. You may also want to discuss the concern in the first instance with the Headteacher. The Headteacher will collect as much evidence as

possible by speaking where possible with the person who raised the concern, to the individual involved and any witnesses.

7. Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2024. It provides excellent case studies and the learning from Serious Case Reviews about opportunities for reporting low level concerns which were missed and which led to abuse occurring.
https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf

8. Low Level Concern Form

This form will be available to staff via:

- Staff Resources SharePoint
- DSL / DDSLs

9. Monitoring and Review

The school will monitor records so that any potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms thresholds, in which case it will be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimize the risk of it happening again.

The Headteacher has a very strong relationship with the LADO and will consult the LADO in most cases if there is any doubt as to whether a concern meets the harm threshold. This also ensures that the school balances its duty of care to the child as well as to the member of staff.

The Headteacher will report on low level concerns (anonymised) to the Safeguarding Committee.

Low-Level Concern Form

Please return this form to the Headteacher. If the concern is about the Headteacher please return to the Chair of Governors.

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with St Augustine's Priory's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of concern

Name of staff member:	**Department & Role:**
Signed:	**Time & Date:**
Received by	**At: (Time)** **On: (Date)**
Action Taken: (Specify)	

Rationale for decisions and action taken:
Signed: **Time & Date:**

This record will be held securely in accordance with St Augustine's Priory's Low-Level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but St Augustine's may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.