



# BUCKINGHAM PREPARATORY SCHOOL

'Together we nurture, we inspire, we achieve'

## A6 – Safeguarding and Welfare of Children Policy

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Reviewed SMT + DSL's	September 2021

To be reviewed by:	Review date:
SMT + DSL	September 2022

Reviewed by Governors : November 2021

## BUCKINGHAM PREPARATORY SCHOOL SAFEGUARDING AND THE WELFARE OF CHILDREN POLICY

The most recent ISI inspection was May 2017.

“Arrangements are made to safeguard and promote the welfare of pupils by means that pay due regard to current statutory guidance;”

**[This is a whole school policy including Early Years Foundation Stage]**

*In compliance with:*

- *Keeping Children Safe in Education (KCSIE) (September 2021)*
- *Working together to safeguard children (March 2018)*
- *What to do if you're worried a child is being abused (March 2015)*
- Disqualification under the Childcare Act (June 2016)
- 'Prevent' Duty Guidance for England and Wales (2021)
- Education Act 2002 Section 175
- Coronavirus (COVID-19) Safeguarding in schools, colleges and other providers and Safeguarding and remote education during coronavirus (COVID-19)
- Guidance for safer working practice for those with children and young people in education settings (May 2019)
- Education and Training (Welfare of Children) Act 2021
- Education (Independent School Standards) Regulations 2014

This policy has been authorised by the Governors of the school and is reviewed annually.

Staff with safeguarding experience may contribute to writing the policy.

This policy is made available to parents on the school website and in hard copy on request.

This policy can be made available in large print or other accessible format if required: Its procedures apply wherever staff, governors or volunteers are working with pupils even where this is away from the school, for example on educational visits; and it also applies to the Early Years Foundation Stage (EYFS) provision.

### LINKED POLICIES

This policy should be read and adhered to in conjunction with the following Buckingham Preparatory School policies:

- Anti-Radicalisation Policy
- Health and Safety Policy
- Internet and E-Safety Policy
- Staff Code of Conduct
- Whistleblowing policy
- Safer Recruitment Policy
- Anti-bullying & Cyber Bullying Policy
- Behaviour and Sanctions Policy

- Risk Assessment Policy
- Missing Child Policy
- Uncollected Child Policy
- First Aid/Medicines at School Policy
- Parent Handbook
- PSHEE Curriculum
- Mobile Phone Policy
- Attendance, Truancy and Missing in Education Policy
- Intimate Care Policy
- PSHEE/RHE Curriculum Policy (2020)
- Covid Policies

## STATEMENT OF INTENT

The safety and welfare of all our pupils at Buckingham Preparatory School is our highest priority. We will provide a safe and caring environment so that every pupil can learn in safety. It is essential that everyone who works within the school understands their safeguarding responsibilities. Safeguarding is **everyone's** responsibility and anyone can make a referral to Children's Social Care. Every child has a voice and will be treated with tolerance and respect. The best interests of the child will be kept at the forefront at all times. All staff understand the importance of taking victims seriously, of reassuring them that they will be supported and kept safe, of not ever being made to feel ashamed for making a report.

The school will take the following steps to promote and safeguard the welfare of pupils at the school:

We ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers, (including staff employed by another organisation) to work with children. We ensure sufficient relevant staff are trained in safer recruitment processes. The guidance is provided in **KCSIE 2021, Disqualification under the Childcare Act 2016, The Education Independent Schools Standards 2014; the Statutory Framework for the Early Years Foundation Stage, Education and Training Act 2021.**

We always ensure that no member of staff starts work before a barred list check has been undertaken and is clear. For teachers the same applies to Prohibition Order Checks (required since 2012) and Prohibition from Governance/Leadership roles for anyone appointed to senior roles of Governors since September 2016. Please see the School's **Safer Recruitment Policy**.

We ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff or volunteers;

We follow the inter-agency procedures of the Harrow Strategic Safeguarding Partnership and where appropriate liaise with them when needed.

We are alert to the signs of abuse both in the school and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;

We deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his/her agreed child protection plan;

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

about a child that is also considered a safeguarding concern, safeguarding procedures will be followed.

We are alert to children's physical and mental health needs and to promote their welfare in the context of early help:

**Prevention** - the school creates a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about material wellbeing through the curriculum and reinforcing this teaching through school activities and ethos.

**Identification** - recognising emerging issues as early and accurately as possible.

**Early support** - helping pupils to access evidence based early support and interventions  
Access to specialist support – working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

We operate robust and effective Health and Safety procedures;

We provide adequate filtering systems to keep the children safe when accessing the internet at school;

We are alert to the wide range of harm which may affect children either directly or indirectly, including Child Sexual Exploitation, substance misuse, domestic violence, missing from education, Female Genital Mutilation (FGM), upskirting;

We are alert to the risk of children being drawn into terrorism or becoming radicalised, including support for extremist ideology, based on an understanding of the potential risks in the local area. Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Knowing what steps to take to obtain the best help and support for children in these circumstances;

Please see the **Anti Radicalisation Policy Sept 2021**.

We teach children about how best to keep themselves safe through the appropriate inclusion of safeguarding matters in the curriculum, for example, the safe use of electronic devices and internet, promoting British Values and respecting different needs and cultures in society.

**See Internet & E-safety Policy, Anti-bullying and Cyberbullying Policy and PSHEE/RHE Curriculum.**

We ensure the school premises are secure at all times and have CCTV fitted with a recording system in 3 areas around the school exits.

We take into account government guidance on coronavirus (COVID-19) during the outbreak. This helps us continue to have appropriate regard to KCSIE and so keep our children safe.

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

## **DEFINITION OF SAFEGUARDING**

KCSIE defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children

grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. As a school we are alert at all times to the different needs and risks to children. We are prepared to take steps to promote pupil welfare and to contact other agencies when required. The list in **KCSIE 2021** is not exhaustive.

The **'Prevent'** duty guidance emphasises the need for schools to give due regard to the need to prevent children being drawn into terrorism.

We will be vigilant to the ever changing needs of our children based on issues in the local community and emerging national themes and issues. Staff will be kept up to date and supported on such matters by the DSL.

"All staff should be aware of the process of making referrals to children's social care and for statutory assessments under the **Children Act 1989**, especially **section 17** (children in need) and **section 47** (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments".

We will pay special attention to children with are 'looked after' by the local authority.

If required the school will provide a designated member of staff to have responsibility or the welfare and progress of looked after children. They will be trained for the role.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children. It is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

We will pay special attention to the needs and vulnerabilities of children with Special Educational Needs or who have a disability as they can be more prone to peer group isolation than other children. To address these additional challenges we will consider extra pastoral support for children with SEN and disabilities.

### *Key legislation and policies:*

- **Section 17 Children Act 1989** – Duty on the local authority to provide relevant services to children 'in need'
- **Section 47(1) The Children Act 1989**, which places the duty on the local authority to investigate the circumstances when it is thought a child may be suffering, or is likely to suffer significant harm.
- **Education and Training Welfare Act 2021**
- **Staff Code of Conduct**
- **Whistleblowing policy**
- **Safer Recruitment Policy**
- **Anti-bullying and Cyberbullying policy**
- **Conduct and Behaviour Policy**
- **Internet and E-Safety Policy**
- **Risk assessment policy for the promotion of pupil welfare**
- **Missing pupil policy**
- **First Aid Policy and Medicines at School Policy**
- **Attendance and Truancy Policy (Missing in Education)**

## THE DESIGNATED SAFEGUARDING LEAD(S) DSL(S)

Designated safeguarding leads will be given the time, funding, training, resources and support to enable him/her/them to support other staff or volunteers on all safeguarding matters, to contribute to strategy discussions and inter-agency meetings and to contribute to assessments (Common Assessment Framework (CAF), Team Around the Child (TAC)). DSL(s) will also establish and sustain clear working relationships with children's services, and Local Authority Designated Officer (LADO) as a pre-requisite to good safeguarding practice in order to ensure the smooth operation of referrals and provision of advice and guidance. DSL(s) will work locally with the three safeguarding partners, the local authority, a clinical commissioning group for an area within the local authority and the chief officer of police for an area. The designated Safeguarding Lead will be on the Senior Management Team. On-line safety comes under the remit of the DSL.

### Contact details for DSL(s) are as follows:

The Designated Safeguarding Lead (DSL), **Michael Doyle (Assistant Headteacher, DSL, EYFS Lead), Ed Arghebant (Assistant Headteacher) , Kiera Feely (Pre-School)** will then follow the Harrow Child Protection Procedures. DSL's can be contacted via the school phone number 020 88662737. The Governors have approved a job description for the DSL who have been trained to the required level in respect of inter-agency working.

In Pre-school, **EYFS, Michael Doyle** is the DSL for safeguarding children and **Kiera Feely** is the Deputy and they will liaise with local statutory children's agencies as appropriate.

The main responsibilities of the DSL are managing referrals, training and raising awareness. (Please refer to **Appendix 2** for more details).

They are to make prompt contact with children's social care where there are concerns that a child may be in need of help or at risk and/or with the LADO in relation to allegations against someone working in the school and/or with the police if a criminal offence is suspected.

The DSL should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC-When to call the police helps DSL understand when they should be calling the police and what to expect when they do so.

As a school we will be persistent in making and chasing up referrals if we feel that the appropriate action is not being taken by the statutory agencies. Records will be kept of this.

## TRAINING

Any DSLs and DDSLs will undertake appropriate training in child protection and inter-agency working (up to date and at least annually). All staff are aware of the systems within Buckingham Prep School which support safeguarding and are explained to them as part of their staff induction.

Child protection training will be provided for all staff including the Head Teacher annually and refreshed and updated as necessary. New staff, will read the Safeguarding policy and Part one/Annex A of the current KCSIE before they start or on their first day provided by the DSL as part of their induction. All staff and Governors must receive annual training, which can be delivered through the DSL or external experts, in line with Harrow Strategic Safeguarding Partnership advice to include Prevent and on-line safety. All staff to be trained to manage a report of child sexual violence and sexual harassment, and peer on peer/Child on child abuse. Additionally, there will be regular updates by email, notices on boards etc. about changes in school policy, procedures or national guidance.

All staff, including temporary staff and volunteers, have been given the **School Code of Conduct / Behaviour and Sanctions Policy/ Staff Handbook/ Internet and E-Safety Policy/ Truancy, Attendance and Missing in Education Policy**. All new staff are provided with these policies as part of their induction. Staff read key policies including the **Safeguarding and Promoting the Welfare of Pupils** and the **KCSIE Part 1 and Annex A** at the beginning of each academic year and as part of their induction. School leaders and those who work directly with children also read **Annex B**.

All staff use the Brook Sexual Behaviours Traffic Light Tool as a guide to any pupil's sexual behaviour (<https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>).

Where possible the school will ensure that staff of contractors regularly in school have some basic safeguarding training and know who the DSL is.

The School has robust anti-bullying policies and procedures (which include anti-cyber-bullying). These are regularly discussed and refreshed in light of experience and best practice. Staff understand that children can abuse other children, can recognise the indicators and signs of peer on peer abuse, and know how to identify it and respond to reports.

## **DUTY OF STAFF, GOVERNORS AND VOLUNTEERS**

All staff, Governors and volunteers of the school are under a general duty to:

- Protect children from abuse;
- To be aware of the child protection and safeguarding procedure and their respective responsibilities;
- To know how to access and implement the procedures in this policy and to take personal responsibility for ensuring actions are taken to promote the welfare of pupils. Consequently, safeguarding is **everyone's responsibility** and staff/volunteers can report concerns directly to children's services if they feel concerns are not being appropriately acted upon; we are aware of abuse that 'it could happen here' and will take appropriate measures to deal with any disclosures.
- All staff should be aware of the of indicators of abuse, neglect and sexual harassment.
- All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events.
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. Staff should be aware that peer on peer abuse can happen both in and out of school.
- All staff 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.
- To keep sufficient records of any significant complaints, conversations or events concerning the welfare or protection of pupils;
- To report any matters of concern to designated staff in accordance with this policy.

Governors will undertake an annual, and ideally more frequent, review of the school's child protection policies and procedures and the efficiency with which the related duties have been discharged. The Governors should oversee the DSL job description and account abilities and



coverage of the role during term times, holidays and out of hours.

- Governors are under a duty to act on any deficiencies or weaknesses in the child protection policy or its implementation and to remedy them without delay.

Note: **Mrs Lynn Grimes** is the **Child Protection Governor** ([chairofgovernors@buckprep.org](mailto:chairofgovernors@buckprep.org)) and she has completed the necessary level of safeguarding training.

Child protection records are held securely on the Engage Portal and any hard necessary hard copies and records are in a locked cupboard in the Assistant Head's office.

## PROCEDURES

Buckingham Preparatory School has a policy of partnership between home and school, but with child abuse, or suspicion of child abuse, it is our duty to place the interests of the child as being paramount in all considerations. This may mean that parents are not informed or consulted in some instances. We may not be able to prevent child abuse, but by following child protection procedures, we are trying our best to protect all our children and ensure their welfare is being actively promoted and safeguarded. As far as is consistent with this primary duty the school will keep parents and carers involved at all stages and ensure that active steps are being taken to listen to the wishes and feelings of the child.

The school is **not empowered to investigate cases of significant harm (actual or likely)** as this is the sole responsibility of child protection agencies (Children's Services and/or the police). However, the school is committed to the active promotion of general welfare and will take necessary steps to ensure any concerns outside formal child protection matters are suitably assessed and acted upon. Where necessary, this action will involve relevant external agencies such as children's services to ensure children receive timely and appropriate help and support.

Staff and volunteers are in contact with children all day and are in a position to detect possible abuse or changes in behaviour or attitude which may reflect issues in a child's life. Staff must feel confident to freely raise concerns with the DSL (see **Whistleblowing Policy**). The criteria should be that they have a reasonable belief that a child's welfare is at risk or the child may suffer significant harm (actual or likely),

### Reasons for Following Procedures

- It protects the child to the best of our ability
- It avoids delay
- It provides consistency
- It protects all staff
- It ensures that, if further action is taken by another agency, then the school has followed the correct processes and procedures

## GUIDELINES

In line with 'Working Together' when reporting concern or suspicion, all adults in the school and in all settings must follow the following procedures:

- Every complaint or suspicion of abuse from within or outside the school will be taken seriously and acted upon in accordance with this policy and local and national guidance.



- Child protection training provides staff with information on the main types of abuse and other potential sources of harm. Staff must be aware of signs of abuse or harm and be prepared to take action to report where these exist;
- If a member of staff or volunteer is concerned about the welfare of a child the matter must be reported to a designated member of staff as soon as possible. There should be no delay in reporting. Pastoral support as appropriate or referral to children's social care will be made.

If a member of staff or volunteer feels a child is at risk the matter must be reported to a designated member of staff immediately (or within 24 hours). The DSL will refer to children's social services or the police (if a crime has been committed). This should be done immediately (or within 24 hours).

- Staff are advised on guidelines of respect, safety and physical contact when working with children in certain environments. I.e. Changing for PE or swimming, music, drama, games lessons (where physical contact may take place to demonstrating positions.)
- All doors in school have a glass panel to help ensure the safety of both children and staff if 1: 1 meetings take place.
- Further details on reporting are set out in the Appendices.

**If at any point, there is a risk of immediate significant harm to a child a referral will be made to children's services without any delay. It should be noted that anyone can make a referral and it is the responsibility of all concerned to push for action where this is felt to be necessary including escalation of concerns to higher organisational levels.**

From October 2015 teachers must report to the police where they discover that an act of Female Genital Mutilation appears to have been carried out. In such situations the matter should also be discussed with the DSL(s).

Normal referral processes must also be followed where there are any concerns about children who may be at risk of being drawn into terrorism.

### **Action by the DSL(s) – See Appendices**

On being notified of a complaint or suspicion of abuse/harm, the DSL will follow the procedures in the flowcharts in **Appendix 5 and 6**. The action which must be then taken by the DSL(s) will take into full account:

- Harrow Strategic Safeguarding Partnership policies and procedures;
- Local information sharing protocols (including for 'prevent');
- The nature and seriousness of the suspicion or complaint
- The wishes and feelings of the child.
- Ensure victims are reassured that they are being taken seriously and that they will be supported and kept safe.

- It is important that the victim is never given the impression that they are creating a problem by reporting and form of abuse, sexual violence or sexual harassment. No victim should ever be made to feel ashamed of making a report.
- Duties of confidentiality so far as they do not hinder appropriate action being taken.

If there is any doubt about the nature of the concern the DSL(s) will consult with children's services and act on the advice given.

Where concerns exist a referral must be made to children's services within **24 hours and preferably sooner.**

If the referral is made by telephone the DSL(s) will confirm the referral in writing and will expect a formal acknowledgement of action to be taken. If this is not forthcoming the DSL(s) will follow up immediately with children's services.

Where the threshold for referring a child to children's services because of significant harm or abuse has not been reached the DSL(s) will consider how best the welfare of a child can best be promoted. This is usually done in conjunction with parents or carers. Children's services are empowered to offer advice and support to children in need in accordance with duties under **Section 17 Children Act 1989**. Such help may take the form of a CAF, or TAC or other form of support service to help a child.

Where relevant, the school will cooperate with the Channel panel and police to bring help and support to bear on a child who may be at risk of getting involved in terrorism.

In all situations staff and volunteers must record in clear and precise ways what a child has said and what action was taken in response.

## **DEALING WITH ALLEGATIONS AGAINST STAFF, SUPPLY STAFF, GOVERNORS, VOLUNTEERS AND CONTRACTORS**

The following procedure applies when a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerns about staff, supply staff or volunteers that do not meet this "harms threshold" are referred to by KCSIE as "low level concerns" and the procedures for these are discussed at the end of this section.

As part of their Safeguarding Induction all staff discuss and sign to confirm that they have read the Safeguarding Policy and KCSIE guidance. They also discuss and sign the staff code of conduct and all related safeguarding policies prior to starting at the school. Therefore, the expectations for staff behaviour are made clear to all staff. Governors realise that because of their daily contact with children in a variety of situations, including the caring role, teachers and other school staff are vulnerable to accusations of abuse. The Governors, therefore expect all staff to follow the Government procedures set out in *'Dealing with allegations of abuse against teachers and other staff (part 4 of KCSIE)*.

Members of staff who hear an allegation of abuse against another member of staff, supply staff or volunteer or who witness abuse should report the matter immediately to the Head Teacher so that appropriate action can be taken; this includes allegations against the DSL. Where there is a conflict of interest in reporting the matter to the head, staff must report to the LADO direct. If the allegation is against the Head Teacher, it should be taken directly to the Chair of Governors/Safeguarding Governor without informing the Head Teacher. An allegation against a teacher who is no longer teaching at the school or historical allegations will be referred by the Head Teacher to the police.

Any allegation made against a teacher, other member of staff, supply staff, volunteer or contractor will be dealt with quickly and in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. In the first instance, before any investigation is undertaken, the Head Teacher or Chair of Governors will immediately or certainly within one working day contact the Harrow Strategic Safeguarding Partnership using the LADO Referral Form (or Tel: 020 8901 2690) to discuss the allegation and agree a course of action including any involvement of the police; if a crime has been committed the police must be informed. The school will not undertake their own investigations of allegations without prior consultation with the Local Authority Designated Officer (LADO) (or designated officer or team of officers), or in the most serious cases, the Police, so as not to jeopardise statutory investigations. GDPR cannot be allowed to stand in the way of safeguarding children. The school does not require parental consent before reporting allegations to the LADO (or designated officer or team of officers). In borderline cases, discussions with the LADO (or designated officer or team of officers) can be held informally and without naming the school or individual.

Discussion with the LADO should be recorded in writing, and communication with both the individual and the parents of the pupil(s) agreed. Consideration must be given as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The Designated Officer will provide advice and will preside over the investigation of the allegation; weight will be given to the views of the LADO (or designated officer or team of officers), KCSIE, WT and School policies when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer. The school will make every effort to maintain confidentiality while an allegation is being investigated or considered. Any investigation will follow the procedures suggested in Part Four of *KCSIE*.

If the School dispenses with a person's (employed, contracted, a volunteer or a student) services, or would have dispensed with their services had they not resigned, because they have caused harm or posed a risk of harm to a child then this will be reported within one month to the Disclosure and Barring Service (DBS). If a teacher is dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence a referral will be made to the Teaching Regulation Agency (TRA).

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

## **“Low Level Concerns”**

Concerns that do not meet the harms threshold laid out above should still be treated seriously and appropriately. According to KCSIE, 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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.

Should someone have any concern about a staff member, supply teacher volunteer or contractor which does not meet the harms threshold that would require informing the Head Teacher, then they should still raise these concerns with either the DSL or the Head Teacher.

Reports about supply staff or contractor will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

When a low level concern has been raised by a third party the Head Teacher will collect as much evidence where possible by talking to the person who raised the concern, to the individual involved and to any witnesses.

Reports of low level concerns should be recorded in writing, with details of the concern, the context in which it arose and the action taken. The name of the person reporting should be noted wishing the person to remain anonymous as far as reasonably possible.

Records of low level concerns should be reviewed to identify any patterns of concerning, problematic or inappropriate behaviour. Where a pattern of behaviour is identified action should be taken, either internally or by referral to the LADO if the harms threshold is met. The school must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of reoccurrence.

The rationale for all decision and actions taken must be recorded.

## REGULATED ACTIVITY

The **Safeguarding Vulnerable Groups Act 2006** provides that the type of work (Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children or work in schools or colleges with the opportunity for contact with children, but not work done by supervised volunteers) will be regulated activity if “it is carried out frequently by the same person” or if “the period condition is satisfied”. Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

- Any arrangements for staff/volunteer supervision pending receipt of an enhanced DBS must be in writing, must be shared with the person concerned and be the subject of regular review.
- Identify the process for reporting staff/volunteers to the DBS where issues of criminal behaviour (caution or conviction) have been identified. Similarly, the Secretary of State should be advised of any teachers who have been dismissed or would have been dismissed because of conduct issues.

## ALLEGATIONS AGAINST PUPILS

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyber bullying), sexual violence, sexual harassment and sexting. All staff should be clear as to the school's procedures on peer on peer abuse. All staff should be trained to manage reporting child on child sexual violence and sexual harassment.

Staff should be aware that peer on peer abuse can occur on any setting. In order to minimise peer on peer abuse it is important to

- Create an open environment where children feel able to talk freely and their voice be listened to.
- Supervision is consistently strong
- Recognise and manage risks
- Providing a strong and positive PSHEE curriculum
- Staff training and CPD about abusive behaviours
- Resources are readily available for children
- Effective use of the school council
- Reinforcing with children what is acceptable behaviour

Allegations against pupils must be reported in accordance with the procedures set out in this policy. A bullying incident will be treated as a child protection concern if there is cause to believe that a child is suffering or is likely to suffer significant harm. The school believes that abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘just having a laugh’ or ‘part of growing up’. We recognise the gendered nature of peer on peer abuse but that all peer on peer abuse is unacceptable and will be taken seriously. This may include abuses such as physical, sexual violence or harassment, emotional, sexting, banter, Initiation/hazing type violence and rituals, upskirting, gender based or a combination.

Victims of peer on peer abuse may require support / counselling to be made available. Whole class

discussions around behaviour and the continued use of PSHEE/RHE to support. It may be necessary to implement a risk assessment. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

The child who has committed the harming may require support / counselling to be made available. There should be a consequence for the actions. Off-site education may need to be put in place and the school will continue to monitor the behaviour of the individual. It may be necessary to implement a risk assessment. A pupil against who such allegations are made may be suspended from school during an investigation and the school's policy on pupil conduct and behaviour will apply.

However, at all times the welfare of both the alleged victim and alleged perpetrator must be considered and assessed, including the potential impact of actions following the identification of concerns.

The school will take advice from Children's Services on any investigations which may be required, including police involvement, and will act on any advice provided. Clear records are kept of all incidents.

Staff should be aware that sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a child or group of children. Staff should be aware that this can happen online or face to face and is never acceptable.

The School will respond to all reports and concerns of child sexual violence and sexual harassment including both those which happen in and out of school. Any report of sexual violence or sexual harassment will be taken seriously, and all victims will be reassured that they are being supported to be kept safe.

## SEND

Staff are made aware that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

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

## MISSING CHILD

A separate procedure is available for staff to respond to a child who goes missing whilst in the care of the school. Please refer to the **Missing Child Policy**. (Please note this is not the same as a child missing from education).

## CHILD MISSING FROM EDUCATION

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. 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. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

There are procedures in place to identify and respond to children who go missing, particularly on repeat occasions (see *Attendance, Truancy and Missing in Education Policy*). The school will inform the local authority (within which the child resides when not at the school) of any pupil who is going to be deleted for the admission register where he/she:

- Has been taken out of school by his/her parents and are being educated outside the school system such as home education;
- Has ceased to attend the school and no longer lives within a reasonable distance of the school;
- Has been certified as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Is in custody for period of more than 4 months due to a final court order and the school believes he/she will not be returning to school at the end of that period;
- Has been permanently excluded or
- Has been withdrawn from the school and the school is unable to confirm the name of his/her new school.

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

## SECURE SCHOOL PREMISES

The school will take all practicable action to ensure school premises are secure in order to protect children from harm.

A school visitor's signing in system is maintained at all times to capture details of all visitors arriving and departing the school. Visitors will wear a Visitor Badge at all times when in the school and will be escorted if they have not been DBS cleared to work with children.

The school premises are fitted with 3 CCTV cameras which are able to record information. There are screens for each of these cameras placed in areas of access to the school.

## SAFETY WITHIN THE SCHOOL AND EARLY YEARS FOUNDATION STAGE

It is the responsibility of **all the staff**, not just the Head Teacher, Assistant Heads, SMT, Caretakers or Health and Safety Coordinator, to ensure the school environment is safe for children.

- Through PSHEE and RHE lessons children should be made aware of safeguarding, including online, and 'Stranger Danger' without alarming them.



- Useful resources to help this include – Be internet legends  
Disrespectnobody  
Thinkuknow  
UK Safer Internet Centre
- Assemblies, Circle Time, PSHEE and RE lessons are used to promote tolerance and mutual respect and understanding.
- Children are provided with regular lessons on e-safety and we ensure that all pupils understand and adhere to the school guidelines in this area. (see **Anti-Bullying and Cyber Bullying Policy**).
- Children are given the opportunity to be listened to through PSHEE/RHE lessons, assemblies, circle time, form time and individual form teacher opportunities.
- Staff should ensure that they are not putting themselves in a situation that will risk harm or allegations of harm to a pupil (e.g. in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil and so on).
- Any visitors that are invited into school must be cleared through School Office, signed in and wear a Visitor's Badge.
- Tradesmen may not carry out repairs in normal working hours where it would bring them into possible contact with the children unless supervised at all times.
- The suitability of a visiting speaker will be decided upon by the Head teacher, and checks will be made if it is felt necessary (google searches, references from other schools where they have spoken, check of content of delivery).
- Once the visit is confirmed the visitors will report to reception upon arrival, show photographic proof of identification and be given a visitor's badge. They will be met by the teacher organising the activity and accompanied around school for the duration of the visit. Visiting speakers should be talking to or working with children with other members of staff present. They will be signed out at the end of their visit and return the visitor's badge.
- For all visiting speakers and other professionals visiting the school a record of their identification and if appropriate their DBS is checked.
- The security system on the doors leading into and out of the school must be maintained at all times. People are buzzed in via the office where they are seen on a screen or via the staffroom when staff must go to the door to meet them, Visitors/tradesmen/prospective parents/governors etc. must sign-in using the signing in system in the Office and wear a Visitors Badge.
- Any hazard encountered within the building or grounds must be reported immediately to **Mr Evans, the Health and Safety Officer** or a Caretaker.
- Rules are in place to ensure the safe movement of people about the building and these must be followed at all times. Children are reminded frequently about these in assembly.
- Staff, visitors and parent helpers must not use their own personal mobile phone or cameras to take pictures of the children at any time, either within the school or on any educational visits unless by prior agreement with the Head. The school will provide a camera and/or mobile within the school premises or on educational visits.

- In the Early Years classrooms/Pre-School and any location where Early Years children might be present, mobile phones, or any personal communication devices must be stored securely and not used within the setting whilst the children are present. Staff are permitted to use their phone in their non-contact times and during breaks when children are not present.
- School cameras and I-pads can be used to record events such as sports day and class assemblies. In EYFS photos/videos are taken for recording a child's progress on their online learning Journal – Tapestry. The Tapestry on-line Learning Journey system is hosted on secure dedicated servers based in the UK. Access to information stored on Tapestry can only be gained by a unique user id and password, only supplied to staff.
- Only designated school cameras or I-pads are to be used by staff to take photos within the setting or on an outing. Images taken and stored on the camera must be downloaded on the school system where they are saved securely.
- School mobile phones, video cameras and iPads are locked away every evening and are under no circumstances to be taken home, unless by prior agreement with the Head teacher. A spot check can be done at any time to ensure that the devices are being used according to the guidelines.
- The exception to the use of personal cameras is:

**Miss Havers/Miss Wilson** who, with permission from the Head, may use their own camera to take images for advertising, website or school social media account purposes. BPS does not post photographs with names on any social media account.

**Mr Evans** who, with permission from the Head may use their own camera or mobile phone to take pictures during sporting fixtures which take place off site.  
These images will then be deleted from the camera after uploading to the shared area.

- In the case of school productions/school events, parents are permitted to take photographs/videos of their own child, however, these images are strictly private.
- At least one authorised adult is present when children are changing for PE and swimming lessons.
- At least one authorised adult will supervise a child who has soiled themselves and the door will remain open.

## DISQUALIFICATION DECLARATION

All staff have a duty to declare to the Head Teacher if there have been disqualifications from childcare made against them.

All existing staff are reminded annually that it is their duty to immediately make any disclosures if they have been disqualified from childcare.

## POLICY MONITORING AND REVIEW

The DSL(s) will ensure that this policy, procedures and their implementation are routinely and

regularly updated and will keep managers, staff, volunteers and Governors informed of any deficiencies in the policy which need to be remedied. It is the responsibility of Governors to ensure that any deficiencies in the policy or procedures are resolved.

Governors will undertake a review of the policy, procedures and their effective implementation at least annually. The review must cover staff training on safeguarding and child protection, referral information, staffing issues and themes which may have emerged in the school and how these have been managed, and the contribution the school has made to joint working with external agencies either on an individual pupil level or corporately.

## KEY CONTACTS

### Harrow Strategic Safeguarding Partnership Procedures

Reference: Harrow Safeguarding Children's Board 'A guide to Safeguarding children – what to do if you are worried about a child in Harrow and <https://www.harrowscb.co.uk/>

**FGM Helpline** on 0800 028 3550 or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk). If you think a child is at immediate risk call the police on 999. Regulated health and social care professionals and teachers in England and Wales must **report** 'known' cases of **FGM** in under 18s to the police (Home Office, 2016).

**NSPCC Whistleblowing Advice Line** Call [0800 028 0285](tel:08000280285) Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**CHILDREN & FAMILY SERVICES:  
CHILDREN'S ACCESS TEAM GOLDEN NUMBER  
TEL: 020 8901 2690**

In the event of any allegations of serious harm or abuse by any person looking after children, the school will contact the local safeguarding team and, following their advice, complete a Common Assessment Framework Form (CAF Form) which is downloadable from <https://www.harrowscb.co.uk/report-a-concern/general-referral-form-for-practitioners/> or available from **Michael Doyle** (DSL).

**Michael Doyle** - Buckingham Prep School DSL – [doylem@buckprep.org](mailto:doylem@buckprep.org)

**Ed Arghebant** - Buckingham Prep School DSL – [arghebante@buckprep.org](mailto:arghebante@buckprep.org)

**Sarah Hollis** - Buckingham Prep School DDSL – [head@buckprep.org](mailto:head@buckprep.org)

**Kiera Feely** – Buckingham Prep School DDSL (Pre-School) – [feelyk@buckprep.org](mailto:feelyk@buckprep.org)

**Lynn Grimes** – Chair of Governors and Safeguarding Governor: [chairofgovernors@buckprep.org](mailto:chairofgovernors@buckprep.org)

### Additional Contacts:

	Harrow Civic Centre 1, 2nd Floor, South Wing Station Road, Harrow, HA1 2XY	The LADO Paulette Lewis	DBS (for referrals) PO Box 181 Darlington DL1 9FA
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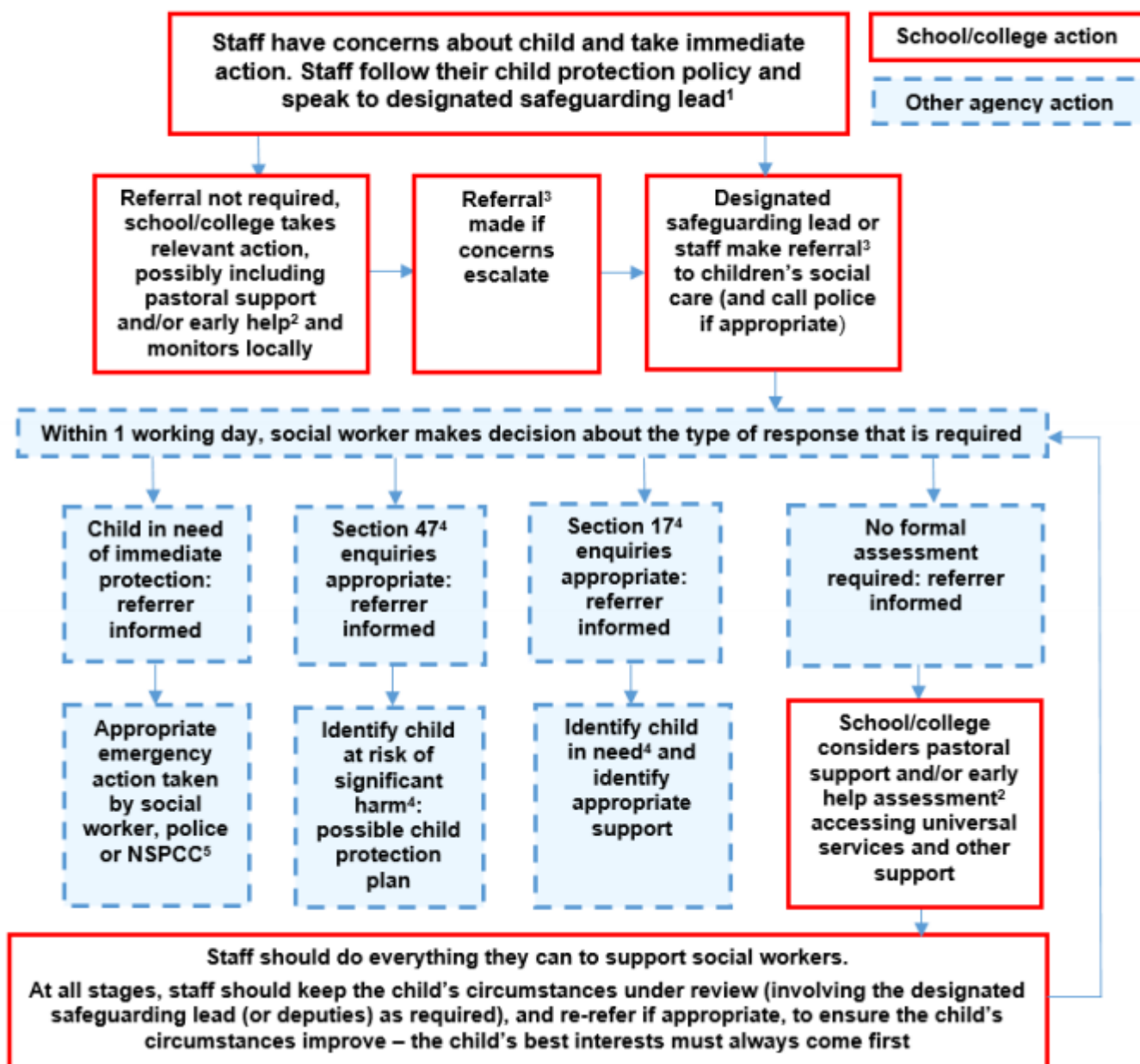
Telephone:	020 8863 5544	020 8901 2690	01325 953
Out of Hours:	020 8424 0999	020 8424 0999	795
e-mail:	<a href="mailto:lscb@harrow.gov.uk">lscb@harrow.gov.uk</a>	<a href="mailto:Paulette.lewis@harrow.gov.uk">Paulette.lewis@harrow.gov.uk</a>	

NSPCC Whistleblowing Advice Line Call 0800 028 0285 Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Childline: 0800 1111

Disclosure and Barring service: <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

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

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## APPENDIX 2: WHAT TO DO IF A CHILD DISCLOSES TO YOU

When a child tells you they have been abused, the child may be feeling scared, guilty, ashamed, angry, and powerless. You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief.

However, it is important for you to remain calm and in control of your feelings in order to reassure the child that something will be done to keep him or her safe. The child's feelings about themselves may be influenced by your initial reaction to the abuse.

- **Listen to the child and what they are saying**
- **Inform the DSL/Head/Assistant Head as soon as possible and outline the concerns**
- **Complete a Child Protection Disclosure Form (available on Engage, or Print from Staff Shared Area)**
- **DSL/Head/Deputy will make a decision about what to do next.**

You can show your care and concern for the child by:

- **DO listen to the child, being aware of the distress they may be experiencing.**
- **DO control expressions of panic and/or shock. Be sensitive, caring and LISTEN.**
- **DO express your belief that the child is telling the truth.**
- **DO use the child's language or vocabulary.**
- **DO tell the child that this has happened to other children, and that they are not the only one.**
- **DO reassure the child that to disclose is the right thing to do.**
- **DO emphasize that whatever happened was not the child's fault, and that the child is not bad.**
- **DO tell the child that you know some adults do wrong things.**
- **DO acknowledge that it is difficult to talk about such things.**
- **DO let the child know that you will make a report to the appropriate authorities so that they can help stop the abuse.**
- **DO tell the child you are pleased they told you.**
- **DO tell the child you will do your best to support and protect them.**

You will not be helping the child if you:

- **DON'T make promises you cannot keep, such as promising that you will not tell anyone.**
- **DON'T push the child into giving details of the abuse. Your role is to listen to what the child wants to tell you and not to conduct an investigation (beware of asking any direct questions of the child as this may prejudice any subsequent investigation).**
- **DON'T indiscriminately discuss the circumstances of the child with others not directly involved in helping the child.**

## **APPENDIX 3**

### **Types of abuse and neglect**

#### **Abuse:**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

#### **Physical abuse:**

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

#### **Emotional abuse:**

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

#### **Sexual abuse:**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. See Peer on Peer Abuse in policy.

#### **Neglect:**

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);



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

### Peer on Peer Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. All staff should be clear as to the school's policy and procedures with regards to peer on peer abuse.

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- consensual and non-consensual sharing of nudes and semi nudes images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse. Additional information regarding peer on peer abuse and all the areas listed below can be found in KCSIE - Annex A (2021)

### OTHER TYPES OF HARM TO WHICH STAFF, VOLUNTEERS AND GOVERNORS SHOULD BE ALERT

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and NSPCC websites. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

child sexual exploitation (CSE)	bullying including cyberbullying (as abuse can take place wholly online or technology can be used to facilitate offline abuse)
forced marriage	drugs and county lines
domestic abuse	faith based abuse
fabricated or induced illness	gangs and youth violence
female genital mutilation (FGM)	mental health
gender-based violence/violence against women and girls (VAWG)	private fostering

preventing radicalisation	protecting children from radicalisation
peer on peer abuse	trafficking and modern slavery and the National Referral Mechanism
abuse	honour-based abuse (HBA)
criminal exploitation of children (CCE) and vulnerable adults county lines	child missing from home or care
children missing education	hate
child sexual exploitation advice for practitioners	missing children and adults
relationship abuse	sexual violence and sexual harassment between children in schools and colleges
sexting	Child abduction and community safety incidents.
Upskirting	'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
Children in the court system	Children with family in prison
Cyber crime	Homelessness

As a school we are alert at all times to the different needs and risks to children. We are prepared to take steps to promote pupil welfare and to contact other agencies when required. The list in KCSIE 2021 is not exhaustive.

## PREVENTING RADICALISATION

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach. See full *Anti Radicalisation Policy* for guidance, curriculum details and risk assessment details.

## DOMESTIC ABUSE

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

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

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

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

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

*NSPCC- UK domestic-abuse Signs Symptoms Effects*

*Refuge : what is domestic violence/effects of domestic violence on children*

*Safelives: young people and domestic abuse*

## FGM

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

## CHILD SEXUAL EXPLOITATION (CSE) & CHILD CRIMINAL EXPLOITATION (CCE)

Both child sexual exploitation and Child criminal exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. The abuse may be in exchange for something the victim wants or needs and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- 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; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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.

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

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who go missing for periods of time and

- children who regularly miss school or education or do not take part in education.

## HONOUR BASED ABUSE

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

## **APPENDIX 4**

### **ROLE OF THE DESIGNATED SAFEGUARDING LEAD**

Governing bodies, proprietors and management committees should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead.

The designated safeguarding lead/s should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads: It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

#### **Manage referrals**

The designated safeguarding lead is expected to:

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

#### **Work with others**

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

#### **Training**

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

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the **Data Protection Act 2018** and the **General Data Protection Regulation**.
  - understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
  - are able to keep detailed, accurate, secure written records of concerns and referrals;
  - understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
  - are able to understand the unique risks associated with online safety and be confident that they have the appropriate knowledge, filters and monitoring systems and up to date capability required to keep children safe whilst they are online at school or college;
  - can 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;
  - obtain access to resources and attend any relevant or refresher training courses; and
  - encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

### **Raise Awareness**

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

### **Child Protection Records**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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.

Where children leave the school the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

**Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.



## APPENDIX 5

### General advice to staff and volunteers

There are circumstances when it is appropriate for staff to use reasonable force.

If a child discloses abuse or staff are suspicious, there are three things to do:

- Report immediately to one of the designated DSL(s)
- Do not speak to the parents.
- Do not promise the child that it will be kept a secret.

It is very important in these cases that the policy and procedures are applied without delay and comply with the procedures of the Harrow Strategic Safeguarding Partnership.

The reporting teacher will be told of any further action taken i.e. Child Protection Service referral, monitor, etc. If the reported case is taken up and investigated by an external agency, then any meetings, case conferences or action taken will be followed through and the teacher concerned informed.

Staff have an important role in hearing what children have to say. The school can provide a neutral place (Library) where the child feels it is safe to talk. Sensitivity to the disclosure is vital. Staff must listen carefully to what the child is saying, treat it seriously, and value what they say.

Children may feel they will not be believed, or that they will be punished. Staff will need to say that whatever has happened, it is not their fault. Fear of the consequences of telling is very common. It can be very tempting to offer a promise of confidentiality to the child. This is not realistic. The child needs to hear the truth about what will happen, together with a commitment to support the child. It is crucial not to ask leading questions. Our role is to enable the child to speak and then know what to do next.

A list of children causing concern is kept by the DSL and Head Teacher. This includes all children who, for whatever reason, need to be monitored. Staff are kept informed of any child in their class who is on this list at Monday morning staff meetings. Teachers must inform the Head Teacher of any changes/additions so that this list can be kept up to date.

Where a child may be in need of pastoral care but is not at risk of significant harm and the child or family would benefit from a coordinated support from more than one agency (for example: education, health, housing, police) there should be an inter-agency assessment. As a school, we acknowledge our duty to support and care for both children in need and children at risk.

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

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

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is frequently missing /goes missing from care or home;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges for a child, such as substance abuse, adult

- mental health problems or domestic abuse; and/or
- has returned home to their family from care

In the unlikely event of the Head Teacher or designated DSLs not being available to deal with an emergency involving Child Protection issues, then the teacher must speak to the **Chair of Governors, Lynn Grimes, E. Ivor Hughes Foundation, Buckingham Preparatory School, 458 Rayners Lane, HA5 5DT Tel: 0208 866 2737** who will deal with the matter. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. (see **Anti-bullying and Cyber Bullying policy**)

### **Definitions of Child Abuse**

An abused child is a boy or girl under the age of 18 who has suffered from physical injury, physical neglect, failure to thrive, emotional or sexual abuse, which the person who has had custody, charge or care of the child either caused or knowingly failed to prevent. Having custody, charge or care includes any person, in whatever setting, who, at the time, is responsible for that child. It also include radicalisation (see **Anti Radicalisation Policy**)

### **Dealing with all disclosures/allegations of abuse**

1. Allegations must immediately be reported to the DSL(s) who must keep the Head Teacher fully informed. If the allegation is about the DSL, the Head Teacher should be informed. In the absence of the Head Teacher, or in cases where the Head Teacher is the subject of the allegation or concern, the Chair of Governors should be informed without informing the head first.
2. Any allegation against teachers and other staff should be reported to the DSL(s) who will then report them to the Head who will consult the **LADO** within one working day. Any allegations against the Head should be reported to the **Chair of Governors at E. Ivor Hughes Educational Foundation Office, 458 Rayners lane Harrow HA5 5DT**, without notifying the Head first. The Chair of Governors will then contact the **LADO**. In case of serious harm, the Police should be informed from the outset.
3. If the disclosure/allegation of abuse is made against someone outside school e.g. a parent/guardian then it must be referred to the Children Social Care.
4. The outcome of an investigation of an allegation will record if it is substantiated or not; false or malicious. If it is established that the allegation is malicious no details of the allegation will be retained on the individual's personal file. In all other circumstances, a written record will be made of the decision and retained on the individual's personal file in accordance with DFE advice.

## APPENDIX 6

### Signs and Symptoms of abuse or harm to children

This is intended as a guide. Please remember that the presence of one or more factors does not necessarily give proof that child abuse has occurred. It may, however, indicate that investigation should take place.

#### Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes - they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry; Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements

There are four main categories of abuse and neglect.

#### Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds;
  - or bite marks.

#### Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;

- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

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

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

**Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and Parents who fail to seek medical treatment when their children are ill or are injured.

## APPENDIX 7

### Safeguarding Policy update in response to the coronavirus (COVID-19) outbreak

Settings should consider whether any refresh or review of their child protection arrangements is needed in light of coronavirus (COVID-19). This could take the form of a coronavirus (COVID-19) annex and include:

- Ensuring the DSL can advise during periods of closure or remote working or if the usual DSL is unavailable for any reason such as illness. If the DSL is unavailable in person the DDSL will be the first point of call. Followed by the Headteacher.
- Safeguarding arrangements cover the safety of pupils while using online learning.
- how to identify and act on new safeguarding concerns about individual children as they return to childcare
- how contact will be maintained with pupils who are not yet able to return to school
- any updated advice received from the local safeguarding partners
- any updated advice received from local authorities, for example EHC plan risk assessment, attendance and keep-in-touch mechanisms
- working arrangements with children's social workers and the local authority virtual school head (VSH)
- what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children
- how the updated policy links to the broader risk assessment to be conducted before opening, described in the guidance on actions for education and childcare settings to prepare for wider opening

All staff and volunteers should be made aware of the new policy and be kept up to date as it is revised.