



## SAFEGUARDING AND CHILD PROTECTION POLICY Whole school and EYFS

IMPORTANT: For the academic year 2021 – 2022, head/headteacher will be the Principal and therefore these titles are interchangeable.

The headteacher undertakes a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed: Mr Tim Cannell

Date reviewed: 6 September 2021

Date of next review: 1 September 2022

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## 1. INTRODUCTION

Parsons Green Prep aims to safeguard and promote the welfare of children who are pupils at the School, including EYFS, complying with Keeping Children Safe in Education (September 2021), Working Together to Safeguard Children (September 2018), London Child Protection Procedures (2015); the Prevent Duty Guidance for England and Wales (March 2015); RSHE (2019); Departmental advice for schools and childminders (June 2015); The use of social media for on-line radicalisation (July 2015); Non-statutory interim supplements to KCSIE: Coronavirus (COVID-19); safeguarding in schools, colleges and other providers (2020 subject to DfE updates) and Safeguarding and remote education during coronavirus (COVID-19).

The purpose of this policy is to set arrangements to safeguard and promote the welfare of our children. This policy will be reviewed at least annually and updated in-between as necessary.

### Covid-19

This policy takes account of the DfE Guidance for full Opening; Schools updated 7 January 2021 and should be read in conjunction with our Covid-19 protocols as set out in the **Covid-19 Risk Assessment 2021 (as updated)**, a copy of which is on our website and available to staff in the staffroom and with the **Safeguarding and E-Safety for Remote Learning 2021 policy**.

Should the DSL fall ill the DDSL will take over. The DDSLs are Mr Lee Bradshaw and Miss Samantha Porter. Should all three be away from school, e.g. with Covid-19, Mr Tim Cannell will be DSL (who is trained to the appropriate level but not with the Local Authority).

This policy also includes guidance on procedures when a member of staff, a volunteer, the Designated Safeguarding Lead (DSL), the Headteacher or the proprietor faces allegations of abuse.

### Our Aims

Our aims are to:

- Establish and maintain an environment where children feel secure, are encouraged to talk and



are listened to.

- To ensure that children's mental as well as physical health is monitored, protected and promoted in everything we do.
- Establish and maintain a safe environment through our safer recruitment procedures and our visitors to site procedures.
- Work with parents to build their understanding of, and commitment to, the welfare of all our children.
- Help children to establish and sustain satisfying relationships within their families, with peers, and with other adults.
- Enable children to have the self-confidence and the vocabulary to resist inappropriate approaches.
- Ensure that we recognise our duties not only to children at risk of significant harm, but also to children in need. It is not necessary for schools to use the legal phrase "child in need" to show an understanding that our role includes recognising when a child needs support, preventing problems escalating and working with external agencies to this end if that is what is called for.

## 2. DEFINITION OF SAFEGUARDING

Safeguarding is defined for the purposes of this policy as:

- protecting children from maltreatment
- 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
- promoting the welfare of children
- taking action to enable all children to have the best outcomes

## 3. OUR APPROACH

### Prevention

Employees will endeavour to ensure that all children and young people at school can attend safely and appropriately, and are treated with respect and understanding. The school organises its services and activities for children with a preventative, safeguarding purpose in mind. We will establish and maintain an environment where children feel secure, are encouraged to talk and are listened to. We will include opportunities in the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse. We will teach e-safety and how to keep safe online through our computing curriculum and this will be supplemented through the teaching of our PSHE programme, including promotion of fundamental British Values.

### Protection

The school takes all reasonable steps to safeguard and protect the rights, health and wellbeing of children who take part in activities organised within its facilities, as well as those of children who staff may come into contact with in the course of their work. We recognise that because of the day-to-day contact with children school staff are well placed to observe outward signs of abuse. We will also ensure that our children know that there are adults in the school whom they can approach if they are worried.

### Support

Child protection training is made available to all members of staff who work with or come into regular contact with children in the course of their job. The school recognises that child protection issues can be emotive and offers suitable, impartial support to any member of staff affected by this policy, whether directly or indirectly.



## Early Help

The School recognises the importance of providing early help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.

Pupils are encouraged to raise concerns as soon as they are identified, either to their class teacher or directly to the Designated Safeguarding Lead, so that effective early support can be provided.

If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account Hammersmith & Fulham Safeguarding Board threshold criteria, consider what action should be taken.

If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.

The School has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, the School's pastoral and tutor system, the PSHE and RSE programmes and various policies, including Anti-Bullying and Cyber-bullying and e-safety. Staff training also prepares staff to identify children who might benefit from early help.

The School recognises the increased vulnerability of young people to whom any or all of the following apply:

- They are disabled or have special educational needs (whether or not they have a statutory Education, Health and Care Plan).
- They do not have English as a first language.
- They are living away from home for the first time.
- Are faced with challenging family circumstances.
- They are looked after children.
- They are acting as a young carer.
- They are showing early signs of abuse, neglect or mental health problems.
- They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled child's understanding of abuse.

## 4. ROLES & RESPONSIBILITIES

Safeguarding and promoting the welfare of children in our school is the responsibility of the whole school community. All adults working in this school (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the



Designated Safeguarding Lead, who is a member of the school's leadership team.

<p align="center"><b>Designated Safeguarding Lead DSL (including EYFS)</b></p> <p align="center">Marina Hobden <a href="mailto:marina.hobden@parsonsgreenprep.co.uk">marina.hobden@parsonsgreenprep.co.uk</a> via school office 020 7371 9009</p>	<p align="center"><b>Deputy Designated Safeguarding Lead DDSL</b></p> <p align="center">Lee Bradshaw and Samantha Porter <a href="mailto:lee.bradshaw@parsonsgreenprep.co.uk">lee.bradshaw@parsonsgreenprep.co.uk</a> <a href="mailto:samantha.porter@parsonsgreenprep.co.uk">samantha.porter@parsonsgreenprep.co.uk</a> k via school office 020 7371 9009</p>
	<p align="center"><b>Other Trained Staff (not with Local Authority)</b></p> <p align="center"><b>In case of Covid-19 Principal</b></p> <p align="center">Tim Cannell <a href="mailto:principal@parsonsgreenprep.co.uk">principal@parsonsgreenprep.co.uk</a> via school office 020 7371 9009</p>
<p align="center"><b>Other Trained Staff</b></p> <p align="center"><b>Proprietor</b></p> <p align="center"><b>Lucinda Waring</b> <a href="mailto:Proprietor@parsonsgreenprep.co.uk">Proprietor@parsonsgreenprep.co.uk</a> via school office 020 7371 9009</p>	

**a. The Designated Safeguarding Lead (DSL)**

- The Designated Safeguarding Lead is Marina Hobden.
- The Designated Safeguarding Lead takes the lead responsibility for safeguarding and child protection issues, including e-safety. He has the overarching responsibility to promote the welfare of children at PGP.
- The Designated Safeguarding Lead is responsible for safeguarding and promoting the welfare of every child across the school and for managing all child protection issues, including liaison with other agencies.
- The Designated Safeguarding Lead is the first point of contact for external agencies that are pursuing child protection investigations and coordinates the school's representation at child protection conferences and core group meetings (including the submission of written reports for conferences).
- When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, the DSL will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue.
- Where there is any doubt as to the seriousness of this concern, or disagreement between



the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Lead, the LA's Strategic Lead Officer for safeguarding in education services or the Hammersmith & Fulham Initial Consultation and Advice Team (ICAT).

- If a child is in immediate danger or is at risk of harm, a referral will be made to children's social care and/or the police immediately.
- Anyone can make a referral.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead will be informed, as soon as possible, that a referral has been made.

## b. Deputy DSL (DDSL)

The Deputy DSL is trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, is able to carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the DDSL will assume all of the functions above.

## c. The Proprietor

Safeguarding duties are the responsibility of the proprietor. She will ensure that arrangements are made to safeguard and promote the welfare of children and that the arrangements have regard to any guidance issued by the Secretary of State.

The proprietor will ensure that:

- The school has an effective Safeguarding policy in place and the arrangements described in the policy must be implemented fully in practice.
- The school has a code of conduct in place, which includes acceptable use of technologies, staff/pupil relationships and communications including the use of social media.
- The Safeguarding policy and child protection procedures in place are in accordance with locally agreed inter-agency procedures, and the policy is made available to parents on request.
- The school operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff, volunteers and visiting speakers who work with children (see the Safer Recruitment policy).
- The school has procedures for dealing with allegations of abuse against a member of staff, agency worker, contract worker, consultant, student or volunteer.
- A senior member of the school's management structure is designated to take lead responsibility for dealing with child protection issues and liaising with other agencies where necessary.
- The Designated Safeguarding Lead (DSL) receives updated child protection training at least every two years.
- For looked after children, the DSL has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- All staff are trained in child protection regularly, in line with advice from the Local Safeguarding Children Partnership (LSCP).
- Children are taught about safeguarding, including on-line, through the curriculum and PSHE/RSE. Particular attention is paid towards children adjusting their behaviours in order to reduce risks and build resilience, including to radicalisation (Prevent), with particular attention to the safe use of electronic equipment and the internet.
- Staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local education authority, if they have such children on roll. This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up-to-date assessment information for the relevant local authority, the most recent care



- plan and contact arrangements with parents and delegate authority carers.
- Any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.
- There will be an annual review of the school's policies and procedures relating to safeguarding, and how the above duties have been discharged.

#### d. School staff

- All staff are responsible for ensuring that children are protected from harm and that there is satisfactory growth and development of each individual.
- All staff are expected to understand and follow the school's Safeguarding and Child Protection policy.
- All staff are expected to provide a safe encouraging environment in which children should be treated with respect and listened to.
- All school staff have the responsibility to identify and report any suspected abuse and to ensure the safety and wellbeing of all children.
- All staff should know how to recognise signs of abuse and how to report a concern immediately.
- All staff to liaise with the Designated Safeguarding Lead (DSL) and in their absence a Deputy DSL, over any issues and keep written records detailed and accurate.
- Any member of staff may raise concerns or make a referral directly to external agencies; however, they should inform the Designated Safeguarding Lead (DSL) as soon as possible.
- All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

#### e. Managing referrals

The Designated Safeguarding Lead will ensure that:

- The school works closely with the Hammersmith and Fulham Local Safeguarding Children's Partnership (LSCP as of Sept 2019), which sets the local procedures. See pages 35-37 for main contacts and details. The school will operate the safeguarding procedures in line with the locally agreed multi-agency safeguarding procedures put in place by the LSCP.
- All cases of suspected abuse are referred to the local authority children's social care. For children who have suffered or are likely to suffer harm will be reported immediately to Children's Social Care. For those who are in need of additional support from one or more agencies will be reported to Fulham Initial Consultation and Advice Team (ICAT) within 24 hours.
- All cases of suspected radicalisation are referred to the Channel programme.
- The Channel programme act as a source of support, advice and expertise to staff on matters of safety and safeguarding and support staff who make referrals to local authority children's care or to the Channel programme.
- All cases where a person is dismissed or has left due to risk/harm to a child is reported to the Disclosure and Barring Service.
- All cases of suspected abuse which concern a staff member are referred to the Designated Officer for child protection concerns.
- All cases where a crime may have been committed are referred to the police immediately.

#### f. Raising awareness

The Designated Safeguarding Lead will ensure that:

- The school's safeguarding policy is reviewed annually and the procedures and implementations



- are updated and reviewed regularly. This policy is reviewed with the proprietor annually and
- minutes are kept.
  - The school's safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
  - Links are made with Hammersmith and Fulham Local Safeguarding Children Partnership (LSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
  - Where children leave Parsons Green Prep, their child protection file is copied for their new school as soon as possible and transferred separately from the main pupil file.
  - Parsons Green Prep will contact the previous schools or nurseries of any new pupils to request information on safeguarding and child protection issues concerning that particular pupil.

## 5. ABUSE (as identified in KCSIE 2021):

Abuse is the maltreatment of a child. Somebody may abuse a child by inflicting harm (or by neglecting to prevent harm – section 6). Mental health problems can be a sign or indicator of abuse, neglect and/or exploitation, and staff should be aware of the indicators and should follow the processes set out in Appendix 2.

Children may be abused by an adult or adults or by another child or children. It is important to note that abuse can take place online. Likewise, technology can be used to facilitate abuse offline. It is recognised that children with SEND issues are more vulnerable to abuse including peer on peer abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet).

### a. 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.

### b. 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.

### c. Sexual abuse, sexual Violence and Sexual Harassment

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



ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face-to-face (both physically and verbally) and are never acceptable. It is essential to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

Evidence shows girls, children with special educational needs and disabilities (SEND) and 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
- having a zero-tolerance approach to abuse and it should never be passed off as “just banter” or “part of growing up” or “just having a laugh” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

**NB All staff must read section 5 of KCSIE September 2021 in addition to the information below.** See also section under peer-on-peer abuse.

If harmful sexual behaviour is alleged to have occurred, the School will have regard to Part 5 of KCSIE (2021) and take into account the local response of the police and local Safeguarding Children Partnership.

In instances of peer-on-peer abuse where pupils are involved in harmful or abusive sexual behaviour the School will follow the Department for Education Advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (May 2018).

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the School's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under Safeguarding rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. The management of children and young people with sexually harmful behaviour is complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the Safeguarding procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour should speak to the DSL as soon as possible.

### **What is meant by sexual violence and sexual harassment?**

- Sexual violence and sexual harassment can be between two children, or a group of children.
- Both sexes may be affected.
- Children with SEND are likely to be more vulnerable.
- Sexual violence refers to rape, assault by penetration, or sexual assault.



- Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of sexual images (“nudes”) or videos (sexting) or making inappropriate sexual comments. (Note this list is not exhaustive.)
- It includes sexually harmful and aggressive behaviour involving the use of mobile phones, such as ‘upskirting’, where a picture is taken under a person’s clothing without them knowing, with the intention of viewing their buttocks or genitals to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. Upskirting was made a criminal offence in April 2019; perpetrators could face up to two years in prison if convicted.
- Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive or violent.

When considering harmful sexual behaviour, the ages and developmental stages of the children involved are always considered. Disclosures should be made in the same way as with other safeguarding concerns. Staff are advised not to view any images. The DSL will engage the local Safeguarding Children Partnership.

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

The risk and needs assessment will consider:

- the victim, especially their protection and support
- the alleged perpetrator, and
- all the other children (and, if appropriate, adult students and staff) at the School or especially any actions that are appropriate to protect them.

Risk assessments will be recorded (written or electronic) and will be kept under review. The DSL (or a deputy) will ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required and the DSL will engage the Local Safeguarding Children Partnership in doing so. Further guidance on the considerations to have in mind in these cases can be found in KCSIE (2021).

The following guidance is also useful in relation to sexual behaviour between children in school:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014224/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

In all of the categories above, staff should be mindful of the following:

- Banter
- Additional support
- Bullying, including cyberbullying
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Child abduction and community safety incidents
- Children and the court system
- Children with family members in prison
- children who run away or children missing in education (CME)
- children who may be at risk of being drawn into terrorism
- Cybercrime



- Channel
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- Female Genital Mutilation (FGM)
- forced marriage
- County lines and/or gangs and youth violence
- Modern slavery and the National Referral Mechanism
- gender-based violence/violence against women and girls (VAWG)
- honour-based abuse / violence (HBV)
- homelessness
- mental health
- private fostering
- preventing radicalisation
- The Prevent Duty
- sexting
- teenage relationship abuse
- trafficking
- upskirting
- serious violence & child exploitation
- peer-on-peer/child-on-child abuse
- Sexual violence and sexual harassment between children in schools

## 6. 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 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.

## 7. SPECIFIC SAFEGUARDING ISSUES

### a. Child Sexual Exploitation (CSE)

Child Sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### b. Child Criminal Exploitation (CCE) and County Lines and / or Gangs

Criminal exploitation of children is a geographically widespread form of harm: drug networks or gangs groom and exploit children and young people to carry drugs, money or weapons from urban



areas to suburban and rural areas, market and seaside towns (County Lines); forced labour, such as in cannabis factories; forced to shoplift, pickpocket or commit vehicle crime; or threaten or commit serious violence to others. Key to identifying potential involvement in CCE are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (January 2020) will be considered. This can affect any child or young person (male or female) under the age of 18 years.

It:

- can still be exploitation even if the activity appears consensual;
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

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

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the Local Authority.

### c. Female Genital Mutilation (FGM)

Female Genital Mutilation is the partial or total removal of external female genitalia for non- medical reasons. It's also known as female circumcision, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. FGM is most commonly carried out when a girl is 5-8 years old. However, it can happen at any age before a girl or woman is married or pregnant. Some girls are babies when FGM is carried out. In the UK, girls from the Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian communities are most at risk of FGM. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Signs that a girl could be at risk of FGM or has been subjected to the procedure might include:

- Families making preparations for the girl to take perhaps an extended holiday, including arranging vaccinations
- A girl talking about a special procedure or ceremony that is going to take place
- Prolonged absence from school with noticeable behaviour change on return
- Possible bladder or menstrual problems
- Younger girls finding it difficult to sit still, looking uncomfortable, complaining about pain between their legs, or talking of something somebody did to them that they are not allowed to talk about.

It is mandatory for teachers to report to the police any suspicions that an act of FGM has been carried out on a girl who is aged under 18. Teachers who fail to report such cases will face disciplinary sanctions. Regulated



professionals, ie teachers, social workers and healthcare professionals, have a duty under the Serious Crime Act (2015) to report any cases of FGM identified in a female under 18 years of age to the Police via the non-emergency number: 101. Unless the teacher has reason not to, they should still consider and discuss such a case with the school's DSL and involve children's social care as appropriate.

The guidance asserts that professionals should make a safeguarding referral in accordance with their local procedures. If a professional feels that a child is at risk of immediate significant harm, they should not discuss the referral with the parents/carers/family until a strategy meeting has been convened.

#### d. Radicalisation and the Prevent strategy

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo, or reject and/or undermine contemporary ideas and expressions of freedom of choice. The Counter-Terrorism and Security Act places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism.

Signs and indicators of a child who is in the process of being radicalised may include:

- Self-identification, such as naming new ideological leaders/role models, lingering concerns with questions of meaning and identity, concentrated self-image
- Very strong devotion to a particular cause, newfound patriotism
- An 'us versus them' societal view, e.g. seeing society as the enemy, verbal expression against the government, expressed feelings of disconnection, change in personal narrative
- Social interaction markers, such as disconnecting with former community, initiating personal violence, forcing customs on others, untouchable demeanour, dependence on communication technology
- A change in personality, particular emotional expressions
- Association, such as associating with extremist groups, word choice, changes in physical appearance and/or attire (although this is to be treated with caution), internet identity, travel.

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

**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.

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

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL/DDSLs making a Prevent referral.



## The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty. The Prevent Duty is seen as part of the School’s wider safeguarding obligations.

All academic staff have completed an Educare on Prevent which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process. This awareness and training is in accordance with current statutory guidance.

The DSL (and DDSL) have additional online training on the Prevent Duty and this is in accordance with current statutory guidance. The DSL will ensure that any new information around Prevent is disseminated with staff and review how the School protects children online.

### e. Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist-related activity. It is led by the Police Counter-Terrorism Unit and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

### f. Bullying

A bullying incident should be treated as a child protection concern; where there is reasonable cause to believe that a child is suffering or likely to suffer significant harm. It is important to recognise that abuse is not always carried out by an adult on a child; the abuser may be another child or group of children, for example, in the case of bullying.

Bullying is one-off or repeated behaviour that intentionally hurts another pupil or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer. It may occur directly or through cyber-technology. A full description can be found in our anti-bullying policy.

Although anyone can be a target for bullying, victims are typically shy, sensitive and perhaps anxious and insecure. Sometimes they are singled out for physical reasons - being overweight, physically small, having a disability or belonging to a different race, faith or culture.

Bullying can and does occur anywhere where there is inadequate supervision - on the way to and from school for example. Bullies come from all walks of life; they bully for a variety of reasons and may have been bullied or abused themselves. Typically, bullies have low self-esteem and can be excitable, aggressive and jealous. Crucially, they have learned how to gain power over others. The damage inflicted by bullying is often underestimated. It can cause considerable distress to children, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).



Bullying may be:

- Physical, e.g. hitting, kicking, theft.
- Verbal, e.g. name-calling, constant teasing, sarcasm, racist or homophobic taunts, threats, graffiti, gestures.
- Emotional, e.g. tormenting, ridiculing, humiliating, ignoring.
- Sexual, e.g. unwanted physical contact, abusive comments.

### **g. Cyber-bullying**

Cyberbullying is bullying that takes place over digital devices like cell phones, computers, and tablets. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour. Staff should be aware that pupils may use mobile phones out of school and which some of them may abuse to sexually harass their peers, share indecent images consensually and non-consensually and view and share pornography and other harmful content.

Pupils should not bring mobile phones to school. If they need to for any reason they should be handed in to the office on arrival and collected on leaving.

The most common places where cyberbullying occurs are:

- Social Media, such as Facebook, Instagram, Snapchat, and Tik Tok
- Text messaging and messaging apps on mobile or tablet devices
- Instant messaging, direct messaging, and online chatting over the internet
- Online forums, chat rooms and message boards
- Email
- Online gaming communities

There are a number of signs that may indicate that a child is being bullied either in person or online:

- Behavioural changes, such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, erratic mood swings, reluctance to go to school, activities or sports clubs. A drop in performance at school or standard of play.
- Physical signs, such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching, bruising, damaged clothes, and bingeing, for example on food, cigarettes or alcohol.
- A shortage of money or frequent loss of possession.

### **h. Cyber Crime**

To address the risk of fraud, theft and/or irregularity, education providers should as a minimum:

use firewalls, antivirus software and strong passwords

routinely back up data and restrict devices that are used to access

We train our staff to ensure that they:

check the sender of an email is genuine before, for example, sending payment, data or passwords

make direct contact with the sender (without using the reply function) where the email, for example, requests a payment or change of bank details



if telephoning the sender to confirm authenticity, do not use the contact number within the email without first checking it is genuine

understand the risks of using public Wi-Fi

understand the risks of not following payment checks and measures

<https://www.gov.uk/government/publications/indicators-of-potential-fraud-learning-institutions/guide-on-cyber-crime-and-cyber-security-for-education-providers>

#### i. Domestic Violence and Abuse

This 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. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will usually inform the designated safeguarding lead (DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

#### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

#### k. Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

#### l. Children with Family Members in Prison

Children who have a family member in prison are at risk to a number of of poor outcomes such as

Poverty

stigma



isolation and  
poor mental health.

The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

#### m. Child Abduction and Community Safety Incidents

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

#### n. Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The guide to support children at PGP is found below:

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

The guide explains each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### o. Youth Produced Sexual Imagery / Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

#### p. Online Risks

Internet safety is of great importance to the school and along with the teaching of e-safety to our pupils through the PSHE / RSE curriculum and the Computing Curriculum (Purple Mash). The school has appropriate filters in place which are monitored on a regular basis for their effectiveness. Pupils do not have unsupervised access to the internet and pupils are not permitted to bring in mobile phones or their own devices that may enable them to access the internet unsupervised.



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. The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users, for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, or online bullying.
- **commerce:** risks such as gambling, inappropriate advertising, phishing and or financial scams. If you feel our pupils are at risk please inform the DSL who will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

As we increasingly work online, including asking children to learn from home (during ongoing COVID-19 measures) it is essential that our children are safeguarded from potentially harmful and inappropriate online material. As such, senior leaders ensure that appropriate filters and monitoring systems are in place. Pupils are given opportunities to explore their online safety through teaching and learning, as part of providing a broad and balanced curriculum. Particular relevant issues are covered through personal, social, health and economic education (PSHE) and Relationships and Sex Education (RSE) throughout the School.

#### **q. Missing children, frequent/prolonged absence and withdrawal from the school.**

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. It is important that all staff consider the risk that missing children might be travelling to conflict zones, be victims of FGM (Female Genital Mutilation) or forced marriage. The DSL will monitor unauthorised absence, particularly where children go missing on repeated occasions.

The DSL must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more. When pupils of compulsory school age are to be deleted from the admission's register PGP will check that progression to another school is confirmed and inform the local authority. The DSL will report any concerns about children of compulsory school age who are at risk of missing education to the local education authority. It is recognised that these children may be at higher risk of abuse or neglect. In the event that pupils of compulsory school age are leaving PGP to enter a home-schooling contract the DSL will also inform the Local Education Authority.

#### **r. Potential Victims of Modern Slavery and Child Human Trafficking**

Modern slavery, including child trafficking, is child abuse. If, as a school, we become aware or have suspicions that a child may have or is being exploited or trafficked, we will contact the Local Safeguarding Children Partnership in the normal manner to seek advice and support. All children, irrespective of their immigration status, are entitled to Safeguarding and protection under the law. This School recognises this as any normal child protection referral and potential victims of trafficking and modern slavery can be of any nationality and may include British children. This may cover not only those trafficked for sexual exploitation but those trafficked as drug carriers internally in the UK (see also CSE and County Lines).

#### **s. Honour-based abuse and forced marriage**



There is a clear difference between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the young people.

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved. Duress can include physical, psychological, financial, sexual and emotional pressure. Forced Marriage is an abuse of human rights and, where a child is involved, an abuse of the rights of the child.

Forced marriage involving anyone under the age of 18 constitutes a form of child abuse. A child who is forced into marriage is likely to suffer significant harm through physical, sexual or emotional abuse. Forced marriage can have a negative impact on a child's health and development, and can also result in sexual violence including rape. If a child is forced to marry, he or she may be taken abroad for an extended period of time which could amount to child abduction. In addition, a child in such a situation would be absent from school resulting in the loss of educational opportunities and possibly also future employment opportunities. Even if the child is not taken abroad, they are likely to be taken out of school so as to ensure that they do not talk about their situation with their peers.

**Honour-based abuse** is a collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. For young victims it is a form of child abuse and a serious abuse of human rights. It can be distinguished from other forms of violence as it is often committed with some degree of approval and/or collusion from family and/or community members. Women, men and younger members of the family can all be involved in the abuse.

Involving families in cases of honour-based abuse is dangerous:

- It may increase the risk of serious harm to the victim. Experience shows that the family may punish them for seeking help.
- Relatives, friends, community leaders and neighbours should never be used as interpreters in case they are linked to the group suspected of carrying out the crime - despite any reassurances from this known person.
- In cases of violence in the name of honour and of forced marriage, it is essential to consider other siblings in the family that may be experiencing, or are at risk of, the same abuse.

Accurate record keeping in all cases of violence/abuse in the name of honour is important. Records should:

- Be accurate, detailed, clear and include the date
- Use the person's own words in quotation marks
- Document any injuries - include photographs, body maps or pictures of their injuries
- Only be available to those directly involved in the person's case

Practitioners must take care that information which increases the risk to the child is not inadvertently shared with family members.

#### t. Children of parents with mental health problems



Mental health problems are proportionately common in the overall population, the term does not in itself have one clear definition, and therefore the existence of mental health problems should not be taken as a risk factor without contextual information.

The state of a person's mental health is usually not static and can vary according to several factors, correspondingly their capacity to parent safely may also be variable, and therefore, an understanding of the factors which may increase risk is an important part of any assessment.

Many adults who suffer from mental health problems also have substance misuse problems, which is described as Dual Diagnosis, and there may be several agencies and services, for both adults and children, who are working with the family.

National Serious Case Reviews and Domestic Homicide Reviews have identified domestic abuse, parental mental ill health and drug and alcohol misuse as significant factors in families where children have died or been seriously harmed.

The Local Safeguarding Children Partnership have identified the following risks to children of parents with mental health problems:

“A child who has suffered, or is likely to suffer significant harm or whose well-being is affected by parental mental illness could be a child:

- Who features within parental delusions
- Who is involved in their parent's obsessional compulsive behaviours
- Who becomes a target for parental aggression or rejection
- Who has caring responsibilities inappropriate to their age and should be assessed as a young carer
- Who may witness disturbing behaviour arising from the mental illness
- Who is neglected physically and/or emotionally by an unwell parent
- Who does not live with the unwell parent, but has contact (eg formal unsupervised contact sessions or the parent sees the child in visits to the home or on overnight stays)
- Who is at risk of severe injury, profound neglect or death
- Who is an unborn child of a pregnant woman with any previous major mental illness.

Where it is believed that a child of a parent with mental health problems may have suffered, or is likely to suffer significant harm, a referral to Children's Social Care should be made in accordance with the referral procedure.

#### **u. Children of parents who misuse substances**

Substance misuse refers to the abuse of drugs and/or alcohol. Whilst there may be different treatment methodologies for adults with these problems, they are considered together because the consequences for the child are quite similar. Substance misuse refers to both illicit drugs, alcohol, prescription drugs and solvents, the consumption of which is either dependent use, or use associated with having a harmful effect on the individual or the community.

Many substance misusing adults also suffer from mental health problems, which is described as Dual Diagnosis, and there may be several agencies, from both Adult and Children's social care, who are working with the family. Substance misuse can consume a great deal of time, money and emotional energy, which will unavoidably impact on the capacity to parent a child. This behaviour also puts the child at an increased risk of neglect and emotional, physical or sexual abuse, either by the parent or because the child becomes more vulnerable to abuse by others.



Children's physical, emotional, social, intellectual and developmental needs can be adversely affected by their parent's misuse of substances. These effects may be through acts of omission or commission, which have an impact on the child's welfare and protection.

A suspicion or disclosure of a child being at risk due to their parents' misuse of substances should lead to a referral to the Local Safeguarding Children Partnership.

#### v. Domestic abuse

Domestic violence and abuse is defined as:

"Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional.

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition includes 'honour'-based violence (see Honour-based Violence Procedure), Female Genital Mutilation (FGM) (see Female Genital Mutilation (FGM) - Pan Cheshire Practice Guidance) and forced marriage (see Forced Marriage Procedure), and it is clear that victims are not confined to one gender or ethnic group. While the cross-government definition above applies to those aged 16 or above, 'Adolescent- to-Parent violence and abuse' (APVA) can involve children under 16 as well as over 16.

Where there is domestic violence and abuse, the wellbeing of any children in the household must be promoted and all assessments must consider the need to safeguard the children, including unborn children.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, the 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.

- The emotional responses of children who witness domestic violence and abuse may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the violence and at the other parent for being unable to protect them).
- Physical responses may include stress-induced aches and pains, bedwetting, and inability to concentrate. Some children are the direct victims of other types of abuse or are injured while trying to intervene on behalf of their parent or sibling.
- The behavioural responses of children who witness domestic violence and abuse may include acting out, withdrawal, or anxiousness to please. A change in achievement or behaviour at school can be an indicator of problems at home.



Domestic violence and abuse may have a long-term psychological and emotional impact in a number of ways:

- Children may be greatly distressed by witnessing (seeing or hearing) the physical and emotional suffering of a parent, or witnessing the outcome of any assault.
- Children may be pressurised into concealing assaults and experience the fear and anxiety of living in an environment where abuse occurs.
- The domestic violence and abuse may impact negatively on an adult victim's parenting capacity.
- Children may be drawn into the violence and themselves become victims of physical abuse.

For children living in situations of domestic violence and abuse, the effects may result in behavioural issues, absence from school, difficulties concentrating, lower school achievement, ill health, bullying, substance misuse, self-harm, running away, anti-social behaviour and physical injury.

A suspicion or disclosure of domestic abuse should lead to a referral to the Local Safeguarding Children Partnership.

## 8. PEER ON PEER / CHILD ON CHILD ABUSE

Peer-on-peer sexual abuse is sexual abuse that happens between children. It can happen between any number of children and can affect any age group. It is important that staff report any concerns to the DSL as soon as possible.

The school recognises that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

It can be harmful to those who display it (perpetrator) as well as those who experience it (victim). Staff should be aware that harmful sexual behaviour may be an indicator that the perpetrator themselves has been abused.

Children can experience per-on peer abuse in a wide range of settings and the school will take seriously and act appropriately with all forms of peer-on-peer abuse wherever it takes place:

- At school
- At home or in someone else's home
- In public spaces
- Online

As children develop healthily, it is normal for them to display certain types of sexualised behaviour. It is important that all staff can identify if sexualised behaviour has become harmful or abusive, and respond proportionally to keep all the children involved safe.

Everyone should recognise that children are capable of abusing their peers. It is recognised that it is more likely that girls will be victims and boys perpetrators but all peer-on-peer abuse is unacceptable, will be taken seriously and action taken.

Indicators that a child has experienced peer-on-peer sexual abuse may be physical or behavioral. They may appear withdrawn, frightened or begin to act differently from usual. They may also display physical signs such as noticeable discomfort in their genital or anal area.



The school has an attitude of zero tolerance towards any form of peer-on-peer abuse.

Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Anything linked to peer-on-peer abuse will be taken as serious misbehaviour and will be dealt with seriously.

Peer-on-peer (child-on-child) abuse – staff recognising the signs of peer-on-peer abuse and knowing how to respond to reports.

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/college 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.

This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate personal relationships between peers; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment (refer to part 5 of KCSIE 2021); consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery); 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; in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos (sexting or youth-produced imagery) will not be tolerated and all instances will be investigated, whether they take place within school time or happen out of school and are brought to the attention of the school. The DSL/Headteacher will lead any investigation and work with the authorities by taking advice from the Hammersmith & Fulham Initial Consultation and Advice Team (ICAT).

Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm from abuse by another child or group of children, then such abuse will be notified to Children's Social Care. It is expected that all children involved, whether perpetrator or victim, are to be treated as being 'at risk'. PGP has a zero-tolerance approach to peer-on-peer abuse and it should never be passed off as "just banter" or "part of growing up" or "just having a laugh" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children

The school makes it clear how the school minimises the risk for dealing with peer-on-peer abuse.

- The school has a no phone policy for children attending school. If children have a phone to travel to and from school it will be handed in to the school office for safe keeping during the time the child is in school.
- Training staff and keeping them up to date with latest guidance and practice including regular updates in safeguarding and child protection for all staff.
- Children will be appropriately supervised at all times.
- Staff have an attitude of it could happen here.



- The school takes a zero tolerance towards all forms of peer-on-peer abuse and all staff are expected to challenge abusive behaviours between peers.
- Working with children in class and PSHE and developing a culture of children feeling happy to talk to an adult if at any time they are unhappy or feel they are being abused. Classrooms have anonymous concerns boxes which children may use freely. These are monitored regularly by class teachers.
- The school has a well-planned, integrated and implemented PSHE/RSE curriculum
- Ensuring that all staff and children know how to keep safe online
- Working with the pupils to raise awareness of the importance of reporting all incidents of peer-on-peer abuse, through education of what abuse is and its unacceptability in all forms and at all times, strong teacher-pupil relationships, anonymous worry/concerns boxes and opportunities for children to ask questions and discuss issues in PSHE and RSE.

## 9. ACTIONS TO BE TAKEN

### Reporting Concerns

Staff to follow these steps:

1. Concerns about a child in need. It is important to act immediately and notify the DSL. The DSL will then contact either early help/ pastoral support/ children's social care, as appropriate.
2. Child at risk – pass onto DSL immediately. DSL will then contact children's social care/ police if crime committed within 24 hours.
3. Anyone can make a referral at any time. Referrals do not require parental consent to statutory agencies.

a. When a disclosure is made

Where a child makes a disclosure to a member of staff, that member of staff must:

- React calmly so as not to frighten the child.
- Listen carefully.
- Reassure the child that they are right to tell.
- Not make promises of confidentiality, but let them know that you will have to tell another adult.
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child.
- Keep questions to an absolute minimum to ensure a clear and accurate understanding of what has been said.
- Questions should not be leading and should consist of Who? What? When? Where?
- Tell them what you will do next and with whom the information will be shared.

A full written record of what has been said (using the child's own words) will be reported using the safeguarding niggles form that can be found on the teacher's server (appendix 3). A copy will be given to the Designated Safeguarding Lead (DSL) the same day, who will keep it in a secure place.

All allegations will be investigated. The action will depend on the severity of the abuse. In some cases it may be necessary to immediately report the incident to the police and local authority, whilst for less serious but still distressing incidences the DSL/Headteacher may decide to investigate further. It is important that both the victim and perpetrator are listened to and are supported by a member of staff or parent when the investigation is taking place. When making any decisions as to action being taken reference will be made to KCSIE (Sep 2021). Should any disciplinary action be deemed necessary, this will be taken in line with the school Behaviour Policy.



It is essential that victims are reassured that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

Support will be provided for victims, perpetrators and any other children affected.

The Designated Safeguarding Lead (or Deputy DSL) is likely to have a complete safeguarding picture and be the most appropriate person to decide on the school or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.
- the nature of the alleged incident(s), including: might a crime 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 (e.g. is the alleged perpetrator significantly older);
- is the alleged incident a one-off or a sustained pattern of abuse;
- whether there are ongoing risks; and
- other related issues and wider context.

b. Upon noting a potential safeguarding issue

Staff have an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff always act in the best interests of the child. If they have any grounds for suspecting that there are safeguarding concerns around a child, they should raise it at the earliest opportunity. This may be at a staff meeting or in person with the DSL.

If staff have a concern about the mental health of a child either directly or as an indicator (changes to behaviour, attitude, performance, friendships, interests, energy) it must be treated as a safeguarding concern, therefore immediate action should be taken following the procedures in this safeguarding policy and speaking to the DSL as soon as possible.

c. Contextual safeguarding

The school recognises that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL, will consider the context within which such incidents and/or behaviours occur and whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare

Further information may be found in: Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014224/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

## 10. TAKING CONCERNS FORWARD



The Designated Safeguarding Lead (DSL) will assess the concern and will follow the safeguarding procedure flow chart (Appendix 4) to decide whether to do one or a combination of the following depending whether the child is a 'child in need' or a 'child at risk.'

- If the child is a 'child in need', staff should act immediately and contact DSL. The DSL may advise on early help, pastoral support or contact the Hammersmith and Fulham Initial Consultation and Advice Team (ICAT). for advice about how to proceed. Contact will be made ASAP or at least within 24 hours.
- Monitor the situation, which may include early help. This will be if the concern is not serious and no other concerns have been raised.
- Discuss the concern with the child's parents where appropriate.
- If the child is a 'child at risk', DSL will immediately contact the Hammersmith and Fulham Family Service (Initial Consultation and Advice Team) (ICAT). with a referral or at least within 24hours/ one working day.
- If necessary contact will be made the police if a crime has been committed.

All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing. Any member of staff may make a referral to the Fulham Initial Consultation and Advice Team (ICAT). Parental consent is not required for referrals to statutory agencies.

#### **a. Liaising with other bodies**

We work within the multi-agency safeguarding arrangements put in place by Hammersmith and Fulham Local Child Safeguarding Partnership (LCSP) guidelines which confirm locally agreed criteria for action and the local protocol for assessments and inter-agency protocols. Where our concerns involve safeguarding children who have suffered or are likely to suffer significant harm, those concerns will be reported to Children's Social Care immediately. Where we identify those children who are in need of early help from one or more agencies, then we will seek inter-agency assessment using local processes, including use of the Common Assessment Framework (CAF).

If a report is to be made to the authorities, we act within the Hammersmith & Fulham Local Safeguarding Partnership (LSCP) guidance, and they will advise on next steps, including consulting with staff and/or parents. The Designated Safeguarding Lead (DSL), who will usually make the referral, should record the name and designation of the Hammersmith and Fulham Family Service officer or police officer to whom the concerns were passed, together with the time and date of the call, in case any follow-up is needed. A note of any crime report number should also be taken. If another member of staff has made the referral they should follow the same procedure and inform the Designated Safeguarding Lead (DSL) as soon as possible.

#### **b. Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. This is required in order to:

- Protect children.
- Facilitate enquiries.
- Avoid victimisation.
- Safeguard the rights of the person about whom the allegation has been made and others who might be affected.
- Manage disciplinary/complaints aspects.

It is expected that those involved on a need-to-know basis would include the following:

- Members of the team overseeing any investigation.
- The parents of the child alleged to have been abused.
- The person making the allegation.
- Hammersmith and Fulham Family Service Team and the police.



- The alleged abuser (and parents if the alleged abuser is under 18 years of age).

Any information will be stored in a secure place with access limited to the investigation team and in line with data protection. Confidentiality restrictions will apply up to the point where the accused person is charged with an offence.

Whilst the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

### **Children requiring mental health support (see related Mental Health and Emotional Wellbeing Including EYFS Policy)**

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can also, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: the creation of a safe, calm school 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 stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping pupils to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs with support of SENDCo;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision and other events may also have an impact on pupils.

These include: • loss or separation – resulting from death, parental separation, divorce, hospitalization • loss of friendships (especially in adolescence)

- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school



- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder.

Only appropriately trained professionals can make a diagnosis of a mental health problem. School 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. If staff have a concern about the mental health of a child they should report this to the DSL following the procedures outlined in this policy. More information can be found in the DfE

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755135/Mental\\_health\\_and\\_behaviour\\_in\\_schools\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf)

## 11. SUPPORT FOR CHILDREN

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting all children involved in a safeguarding issue:

### a. Support for the Victim

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.



- Consider the proportionality of the response. Support should be tailored on a case-by-case basis.
- The school makes clear that victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support all children through:

- The content of the curriculum.
- The school ethos, which promotes a positive, supportive and secure environment and gives children a sense of being valued.
- Liaison with other agencies that support the child such as Social Services, Child and Adult Mental Health Services, the Education Welfare Advisory Service and the Psychology in Education Service.
- Ensuring that, where a child on the Child protection Register leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

#### **b. Support for the Perpetrator**

- The school has a duty to balance safeguarding the victim (and the wider student body) and on the other hand providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions.
- In its response the school will consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviour in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials.

Advice will be taken, as appropriate, from children's social care, specialist services and the police.

#### **c. Children with special education needs and disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

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

## **12. ALLEGATIONS AGAINST A MEMBER OF STAFF**

### **a. Reporting**



It is vital for all staff at PGP to feel free to raise any concerns they may have about the conduct, behaviour of another of staff including the Head or Proprietor. This is to ensure that a culture of openness, trust and transparency as reflected in our values and expected behaviour as set out in the code of conduct are fostered, monitored and reinforced by all staff. We ensure that a culture of openness so that that staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

**Low-level concern /concerns that don't reach the threshold (Refer to Staff Code of Conduct: Appendix 6 of this document)**

It is vital that all staff are fully committed to ensuring that PGP continually strives to create and embed a culture of openness and trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff is fostered within the organisation. It is therefore important for staff to share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

All low-level concerns should be reported to the Head and if about the Head to the Proprietor, i.e. in the same way as allegations that meet the harms test.

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern – no matter how small, and 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.

**Allegations**

This section applies to all staff who work at or for Parsons Green Prep, including supply staff and those supplied by outside agencies. While the agency will be informed and fully involved in any investigation, it is the responsibility of Parsons Green Prep to investigate fully and act according to this policy where a safeguarding issue is raised. The responsibility cannot be delegated to the supplier.

If an allegation is made against a member of staff the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. We will not undertake our own investigation of allegations without prior consultation with the Hammersmith and Fulham Designated Officer (LADO) or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the Designated Officer will be held informally and without naming the school or individual.

For allegations against staff by another member of staff (may also be referred to as 'whistleblowing'), the school follows the guidance in Part 4 of KCSIE 2021. Any person working on behalf of Parsons Green Prep who suspects that a colleague may be abusing a child or young person must act on their suspicions. Action should also be taken if it is felt that colleagues are not following the code of conduct. This action will serve not only to protect children but also colleagues from false accusations. We acknowledge that this is an extremely sensitive issue and assure all employees and persons working on its behalf that it will fully support and protect anyone who in good faith reports a concern or an allegation that a colleague is, or may be, abusing a child.

These procedures and guidance apply whenever it is alleged that a member of staff, agency worker, contract worker, consultant, student or volunteer has:

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



Staff can also contact NSPCC's dedicated helpline: 0800 028 0285 Please see our Whistleblowing Policy for more information.

### Action to be taken

- All allegations against a member of staff, DSL, supply staff or volunteers must be reported straight away to the Head who will inform the LADO immediately. In the absence of the Head the concern should be reported to the Proprietor.
- If the allegation is against the Head it should be reported to the Proprietor who will immediately inform the LADO. The Head must not be informed prior to contacting the Proprietor or LADO.
- Should there be a conflict of interest in reporting a matter to the Head it should be reported to the LADO directly.
- It is important that the Head or Proprietor (as appropriate) receives a written record with details, names and dates.
- The Head / Proprietor will immediately report the allegation to the LADO, to agree a course of action including the involvement of the police. After which taking on board their advice, KCSIE (2021) and WT (2018) will decide on the next course of action which may or may not involve suspension of the member of staff. All discussions will be recorded in writing and any communication with the individual and the parents of the child/children agreed.
- The Head or proprietor will ensure that steps are taken to make the child in question feel secure and safe.
- The school will not investigate any allegation against a member of staff before a referral to the LADO has been made.
- Relating to allegations in EYFS, the school will inform OFSTED of allegations against people working at the premises or of any other abuse alleged to have take place on the premises as soon as practical or within 14 days the latest

### b. Internal inquiries and suspension

Irrespective of the findings of the borough or of police inquiries, Parsons Green Prep will assess all individual cases under its own disciplinary procedures to decide whether a member of staff can be reinstated and how this can be sensitively handled.

Parsons Green Prep will reach a decision based on the available information and decide on a balance of probability basis whether an allegation is true. If the practice is deemed 'unacceptable professional conduct' and leads to dismissal or resignation the school will consider making a referral to the TRA.

Any information will be stored in a secure place with access limited to the investigation team and in line with data protection. Confidentiality restrictions will apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case. The proprietor has a legal duty to respond to requests from the DBS for information promptly.

The DBS will consider whether to bar the member of staff. Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance.

### c. Resignation and dismissal

If a person (whether employed, contracted, a volunteer or student) dismissed/ removed (or would have been) Parsons Green Prep because their services are no longer used in regulated activity because



he/she is considered unsuitable to work with children, the school will make a prompt report to the DBS where their referral criteria are met (a person who has caused harm or posed a risk of harm to a child). It is important that the report uses as much evidence about the circumstances of the case as possible. Compromise agreements cannot apply in this connection.

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.
- Voluntary withdrawal from supply teaching, contract working, a course for initial teacher training or volunteering.

The school will make a referral to the Disclosure and Barring Service (DBS) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a probation order may be appropriate. If the teacher is dismissed (or would have been dismissed had he/she not resigned) removed for professional misconduct, a referral will be made to the Teaching Regulation Agency (TRA). The reasons 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.'

### c. Other Procedural points

#### i. Support for the subject of allegations

Subject to the specific procedures, the subject of the allegations should be:

- Advised at the outset to contact his/her union representation if a member.
- Treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes.
- Kept informed of the progress of the case and of the investigation.
- Clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.
- Provided with appropriate support (via occupational health or GP surgery).

#### ii. Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child by a member of staff who is still currently working with children). Where such an allegation is made, the procedures as detailed above should be used and the matter reported to the police by the Designated Safeguarding Lead (DSL) or proprietor. This is because other children may be at risk from this person. Anyone who has a previous criminal conviction for offences related to child abuse is automatically excluded from working with children. Local support paths for the abused person will be located.

#### iii. Misuse of the procedure

Malicious complaints about an employee or employees and/or serious and/or persistent abuse of these safeguarding children and child protection procedures will not be tolerated and will be dealt with through the disciplinary process. Employees may not discuss any allegation of child abuse, whether substantiated or not, with:

- Anyone other than the Designated Safeguarding Lead (DSL).
- Any member of any external agency, other than as part of the formal reporting procedure as



set out in this policy or as part of the investigative process.

- Any other interested party, including parents, carers, and relatives of the child or young person without the express permission of the person with overall responsibility for the investigation.

This does not exclude the employee from the need or right to consult with a solicitor, trade union representative, Human Resources, or other bona fide legal adviser.

Any enquiries from the media concerning an allegation of child abuse must be referred to the lead investigating agency's press office.

## 13. MISCELLANEOUS POINTS TO MINIMISE SAFEGUARDING ISSUES

### a. Children Missing in Education

Every child of statutory school age is entitled to an education; this entitlement is enshrined in legislation.

- Children who are missing education (CME) are children of compulsory school age who are not on roll at a school and are not in receipt of suitable education otherwise than at school, such as a placement in alternative provision or electively home educated by their parents or carers.
- CME miss learning opportunities, which is likely to lead to poor outcomes in later life. CME are less likely to take up further education opportunities or find employment after they reach school-leaving age.
- In addition, CME miss the daily monitoring and oversight that is ordinarily available through contact with professionals to children who are on roll at a school; this in turn can mean missed opportunities to support families and vulnerable children. CME have also been found to be at greater risk of harm, including exploitation and radicalisation.
- The reasons for CME are various and include the following: families newly arrived in the area (from the UK or abroad), failure to take up provision offered at 5+ or secondary transfer, parental reluctance to utilise alternative provision after a permanent exclusion, failure of a parent to ensure that a child being home educated is in receipt of suitable provision or a child's name being removed from a school roll in error.

Staff are aware that children going missing can be a warning sign that safeguarding issues may be present. This may include abuse and neglect, including sexual abuse or exploitation or child criminal exploitation. Also, it may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, FGM, or forced marriage.

Parsons Green Prep monitor closely attendance, looking for patterns that may trigger a concern. The H&S manager will check absences every day and contact parents to find out a reason why. The DSL will be notified if there is a concern as to why the child is missing.

The school ensures that, where possible, there are more than one emergency contact numbers. If the H&S manager is unable to make contact with parents/carers, the school will try the emergency contact details. Contact will be made with H&F ACE team in all instances of CME

The school operates in accordance to statutory guidance 'Children Missing Education' (DFE 2016.)

### b. Attendance



The school has a legal duty to report certain attendance issues to the LA: ten days of unauthorised absence (other than for reasons of sickness or leave of absence), failure to attend regularly, and deletion from the school admissions register when the next school is not known. In this last case, the school is required to report circumstances as soon as possible to the LA in which the child lives.

To identify children missing in education the school will complete and submit to the local authority a template Starters and Leavers form via the "s2s" secure access portal.

Children occasionally leave school for long periods of time in situations which are understood and authorised by the school. Even if the parents have indicated that the child may return at the end of the period of absence, the school may nevertheless remove him/her from the roll and inform the local authority as above. Alternatively, the school may merely authorise the absence, keep the child on the roll and ensure that sufficient work is made available to the child while he/she is absent. Whether one route is favoured over another is at the discretion of the Head and depends on all the circumstances.

Staff are aware of the Missing Child Policy, which should be followed should a pupil go missing in school or on an educational visit.

### **c. Transporting Children**

Since transport to outings could provide greater risks, we increase our levels of care. We assess the staff/child ratios required for each outing and whether the staff are suitable to be unsupervised with children. We always accompany children and a driver would not be unaccompanied. We do keep insurance details about vehicles and a list of named drivers.

### **d. One to One Tuition**

Specific attention is given to safeguarding arrangements where children are engaged in close one-to-one teaching, particularly in specialist music and sports provision. All our classrooms have a clear viewing panel.

### **e. Recruitment**

We operate safer recruitment procedures, which includes enhanced DBS checks, Barred List and Prohibition checks for all posts within the school, which are the requirements set out in KCSIE (2021) and Independent Schools Standards regulations. At least one person on our recruitment panel has received safer recruitment training. In addition, we check all references including confirmation by phone of at least two referees and scrutinise application forms.

We take appropriate steps to ensure that no staff members are disqualified from working with children. This applies to all staff even though they may not work directly with children under 8 years of age.

Applicants for posts within Parsons Green Prep are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974. Candidates are informed of the need to carry out checks before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We abide by the DfE requirement - in respect of references and police checks for staff, volunteers and staff of contractors - to ensure that no disqualified or unfit person works in the school or has access to the children.

Please see our Safer Recruitment policy for more information.



## 14. STAFF TRAINING

The Designated Safeguarding Lead will:

- Receive updated child protection training at least every two years. The required training content for the DSL is set out in Annex C of KCSIE (Sep 2021) and covers inter-agency working and Prevent, participation case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. The training will include local inter-agency working protocols and training in LSCP's approach to Prevent duties.
- Receive Prevent awareness training.
- Receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as and when required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

The Designated Safeguarding Lead will ensure that staff:

- Are trained in child protection at least annually, in line with advice from the Local Safeguarding Children Partnership (LSCP). Prevent awareness training will be part of this. Staff who do not attend a staff training session for whatever reason will receive the appropriate training from the DSL to ensure all staff are kept up to date.
- Part One (or Annex A if determined by the Proprietor) KCSIE (2021) should be read and understood by all staff and in addition Annex B by school leaders and those who work directly with children.
- Including temporary staff and volunteers, read at least part one of KCSIE (2021) and updated as appropriate.
- Including temporary staff and volunteers, receive the school's safeguarding policy.
- Including temporary staff and volunteers, receive the staff code of conduct.
- Including temporary staff and volunteers know the identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads
- Receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as and when required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Training is adapted to meet the needs of our community, such as children at risk of being drawn into terrorism, child sexual exploitation, female genital mutilation, cyberbullying and mental health. Staff are trained to manage a report on peer-on-peer abuse including sexual violence and sexual harassment.
- Training in Safeguarding is recorded.
- Staff should be aware of their role in the early help process; be aware of the process for making referrals to children's social care, know what to do if a child tells them he/she is being abused, exploited or neglected, reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- All Deputy DSLs attend two-yearly inter-agency working plus informed updates.

He will also ensure that all new staff, including temporary staff and volunteers that work with children, are provided with either electronically or physically the following documents as part of their induction training that includes:

- Safeguarding basic training at Parsons Green Prep (Appendix 5).
- The school's Safeguarding and Child Protection policy \*



- The Staff Code of Conduct, which includes the whistleblowing procedure, acceptable use of IT, staff/-pupil relationships; reporting low-level concerns (see code of conduct) and communications including use of social media (Appendix 6) \*
  - The Behaviour Policy. Including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying \*
  - The E-safety Policy \*
  - The Safeguarding response to children who go missing in education \*
  - A copy of part 1 of KCSIE + Annex B (September 2021) \*
  - An online Educare course on safeguarding or whole-school INSET training.
  - Role and identity of DSL and DDSL\*
- \*copies of these give to inductees.

## 15. MONITORING AND EVALUATION

This policy will be reviewed annually unless there is new information relating to safeguarding issues as they emerge and evolve, including lessons learnt, when it will be updated immediately. It will include an update and review of procedures and their implementation. As mentioned in the KCSIE (2021), the Designated Safeguarding Lead (DSL), will work with the proprietor on this annual review. Minutes are available to demonstrate breadth and depth of the review.

The proprietor will be responsible for an annual review of the school's child protection policies and procedures and the efficiency with which the related duties have been discharged. She will speak to staff on site to assess their understanding of the policy and to see if processes are being correctly followed. Child protection is an agenda item in all staff meetings. If there is a sustained allegation against a member of staff, the school will work with the Designated Officer to determine whether any improvements could be made to the school's procedures or practice to help prevent similar events in the future.

### USEFUL CONTACTS

#### DBS:

Atlantic Data Ltd,  
Disclosures DBS  
PO BOX  
5531  
Milton Keynes  
BUCKS  
MK7 6YD  
Tel: 08718 727 800  
Email: [info@disclosuresDBS.co.uk](mailto:info@disclosuresDBS.co.uk)

#### Designated Officer (Hammersmith & Fulham)

Megan Brown  
Tel: 0208 753 5125

#### DfE

Tel: 020 7340 7264  
Email: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

#### Fulham Police:



Tel: 101

Tel: 999 (if you have an immediate concern for the wellbeing of a child or young person)

**Hammersmith and Fulham Family Services: Initial Consultation and Advice Team (ICAT)**

Ground Floor

145 King Street

Hammersmith

W6 9XY

Tel: 020 8753 6600

Tel: 020 8748 8588 (out of hours)

Email: [familyservices@lbhf.gov.uk](mailto:familyservices@lbhf.gov.uk)

**HM Government, contact and assessment**

Tel: 020 8753 53 92

Tel: 020 8748 85 88 (out of hours)

**Local Safeguarding Children Board**

Kensington Town Hall

Hornton Street

W8 7NX

Tel: 020 8753 3914

Email: [hflscb@lbhf.gov.uk](mailto:hflscb@lbhf.gov.uk)

**NSPCC whistle-blowing helpline number**

Tel: 0800 028 0258

**Ofsted hotline; whistleblowing telephone number**

WBHL Ofsted

Royal Exchange Buildings

St Ann's Square

Manchester

M2 7LA

Tel: 0300 123 3155 (Monday to Friday from 8am to 6pm)

Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

**SAFEGUARDING AND CHILD PROTECTION CONTACTS FOR SCHOOLS**

Consultation and Advice about a child/young person resident in Hammersmith and Fulham  
For a discussion about any concerns you have regarding a child, please contact our Initial Contact and Advice Team (ICAT) where you will get straight through to a Social Worker on tel: 020 8753 6610 (Out of hours – 020 8748 8588).

For case consultations please contact the Child Protection Advisers:

*Tricia Hunte*

*Charlotte Holt*

*Piyush Bhattacharya*

Telephone: 020 8753 5125

For LADO consultations and referrals please contact the duty Child Protection Adviser on:



Telephone: 020 8753 5125

Email: [LADO@lbhf.gov.uk](mailto:LADO@lbhf.gov.uk)

If you cannot reach a duty CP Adviser you can reach:

Named LADO

*Megan Brown*

Safer Organisations (incorporates LADO) and Safeguarding in Education

Manager Telephone: 020 8753 5125

Email: [megan.brown@lbhf.gov.uk](mailto:megan.brown@lbhf.gov.uk)

CSE Lead

*Emily Harcombe*

Family Support and Child Protection Advisor (Monday to Wednesday only)

Telephone: 020 8753 6918

Mobile: 07467 734 648

Email: [emily.harcombe@lbhf.gov.uk](mailto:emily.harcombe@lbhf.gov.uk)

Tri-borough FGM

Rochelle - Ann Naidoo

Tri-borough Senior Practitioner

Telephone: 020 7641 1610

Email: [rnaidoo@westminster.gov.uk](mailto:rnaidoo@westminster.gov.uk)

Bi-borough PREVENT

Contact the local team on:

Telephone: 020 8753 5727

Email: [prevent@lbhf.gov.uk](mailto:prevent@lbhf.gov.uk)

Tri-borough Multi-Agency Safeguarding Hub (MASH)

*Karen Duncan*

Tri-borough MASH Business Support

Officer Telephone: 020 7641 3991

Email: [kduncan1@westminster.gov.uk](mailto:kduncan1@westminster.gov.uk)

Hammersmith and Fulham School Admissions, Attendance, Child employment, Elective home education and children missing education (ACE) Team

*Elizabeth (Liz) Spearman*

Hammersmith and Fulham Head of ACE and

Admissions Telephone: 020 8753 6231

Email: [elizabeth.spearman@lbhf.gov.uk](mailto:elizabeth.spearman@lbhf.gov.uk)

In an emergency, contact the police on 999.

**Proprietor**

Lucinda Waring

Tel: 020 7371 9009

Email: [lucinda.waring@parsonsgreenprep.co.uk](mailto:lucinda.waring@parsonsgreenprep.co.uk)

Reviewed and approved:	Job title; DSL
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	1 September 2021
Next review due:	1 September 2022



## APPENDIX 1 - SIGNS 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:

- Must be regarded as indicators of the possibility of significant harm.
- Indicates a need for careful assessment and discussion with the agency's nominated child protection person.
- May require consultation with and/or referral to the LA children's social care and/ or the police.

### Recognising physical abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parent/parents is/are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Frequent use of different doctors and accident and emergency departments.
- Reluctance to give information or mention previous injuries.

### Bruising

Children can have accidental bruising, but the following must be considered as indicators of harm unless there is evidence or an adequate explanation provided.

Only a paediatric view around such explanations will be sufficient to dispel concerns listed below:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour, possibly indicating injuries caused at different times.
- The outline of an object used (e.g. belt marks, hand prints or a hair brush).
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

### Bite marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

### Burns and scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and these will always require experienced medical opinion. Any burn with a clear outline may be suspicious, e.g.:

Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).

- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water)



- of its own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns or scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint, and loss of function in the limb or joint.

Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

### Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

### Others

- Fear of parent being contacted.
- Fear of going home.
- Keeping arms and legs crossed.
- Panics in response to pain.
- Behavioural extremes.
- Flinching when approached.
- Child reports an injury caused by parents.
- Reluctance to change clothes.
- Depression.

### Recognising emotional abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical.

The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should therefore be aware that emotional abuse might also indicate the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Delay in physical development or progress.
- Abnormal attachment between a child and parent (e.g. anxious, indiscriminate or no attachment).
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Appeasing behaviour towards others.
- Victimised within the family.
- Frozen watchfulness, particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a 'loner' - difficulty relating to others.
- Sudden speech disorders.
- Impairment of intellectual, emotional, social or behavioural development.
- Failure to thrive.



- Sleeping disorders.
- Fear of making mistakes.
- Sucking, biting or rocking.
- Inappropriately adult or infant.

### Recognising sexual abuse

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a child. Therefore both identification and disclosure rates are deceptively low.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. According to a recent study three-quarters (72 per cent) of sexually abused children did not tell anyone about the abuse at the time. Twenty-seven per cent of the children told someone later, and around a third (31 per cent) still had not told anyone about their experience/s by early adulthood.

If a child makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the child tests the professional's response. There may be no physical signs and indications are likely to be emotional/behavioural.

London Safeguarding Children Board, 2007 ([www.londonscb.gov.uk](http://www.londonscb.gov.uk)) 125 3rd edition

Behavioural indicators which may help professionals identify child sexual abuse include:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Contact or non-contact sexually harmful behaviour.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Involvement in sexual exploitation or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties).
- Unexplained money or gifts.
- Lack of trust in adults.
- Running away.
- References to secrets that can't be told.
- Sudden changes in behaviour.

Physical indicators associated with child sexual abuse include:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a child.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.
- Discomfort when walking or sitting.
- Bedwetting.
- Excessive crying.
- Overeating or anorexia.

Sex offenders have no common profile, and it is important for professionals to avoid attaching any significance to stereotypes around their background or behaviour. While media interest often



focuses on 'stranger danger', research indicates that as much as 80 per cent of sexual offending occurs in the context of a known relationship, either family, acquaintance or colleague.

### Recognising neglect

It is rare that an isolated incident will lead to agencies becoming involved with a neglectful family. Evidence of neglect is built up over a period of time. Professionals should therefore compile a chronology and discuss concerns with any other agencies which may be involved with the family, to establish whether seemingly minor incidents are in fact part of a wider pattern of neglectful parenting.

When working in areas where poverty and deprivation are commonplace professionals may become desensitised to some of the indicators of neglect. These include:

- Failure by parents or carers to meet essential physical needs (e.g. adequate or appropriate food, clothes, warmth, hygiene and medical or dental care).
- Failure by parents or carers to meet essential emotional needs (e.g. to feel loved and valued, to live in a safe, predictable home environment).
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment.
- Child frequently absent from school.
- Child left with inappropriate carers (e.g. too young, complete strangers).
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

Disabled children and young people can be particularly vulnerable to neglect (see section 5.11. Disabled children of London Child protection Procedures 4<sup>th</sup> Edition 2010) due to the increased level of care they may require.

Although neglect can be perpetrated consciously as an abusive act by a parent, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the child's parent, often due to one or more unmet needs of their own.

Indicators of neglect may be:

- Constant hunger.
- Poor hygiene.
- Weight loss/underweight.
- Inappropriate dress.
- Consistent lack of supervision/abandonment.
- Unattended physical problems or medical needs.
- Begging for/stealing food.
- Truancy/late for school.
- Constantly tired/listless.
- Regularly alone/unsupervised.
- Poor relationship with caregiver



## APPENDIX 2 – OUR RESPONSE TO MENTAL HEALTH ISSUES

### Response to Mental Health issues in children

Staff are well placed to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing one. However, only professionals should diagnose mental health problems. The school recognises their role in supporting their pupils' mental health, and have clear systems and processes in place for identifying possible problems, including routes to escalate concerns and clear referral and accountability systems.

Staff are aware of how adverse experiences, like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education.

Staff should immediately raise any mental health concerns which are also safeguarding concerns with the Designated Safeguarding Lead (DSL), DDSL, form teacher or a member of the SLT.

Indicators of mental health issues may include:

Loss of appetite  
Fatigue  
Friendship issues  
Drop in academic performance  
Obsessive interests  
Mood swings  
Feeling sad  
Excessive worrying  
Inability to cope

### Our response

- Should a member of staff have any concerns about a child's mental health they should act immediately.
- Inform the form teacher in the first instance, who should refer to Head of Key Stage and DSL as appropriate.
- The school will raise concerns with parents.
- Outside professionals/agencies will be involved as appropriate.
- An individual action plan will be put in place to support the child and will be reviewed at least every two weeks.
- Referral to Hammersmith & Fulham will be made immediately if any safeguarding concerns arise or the school continues to have concerns which are not being addressed.



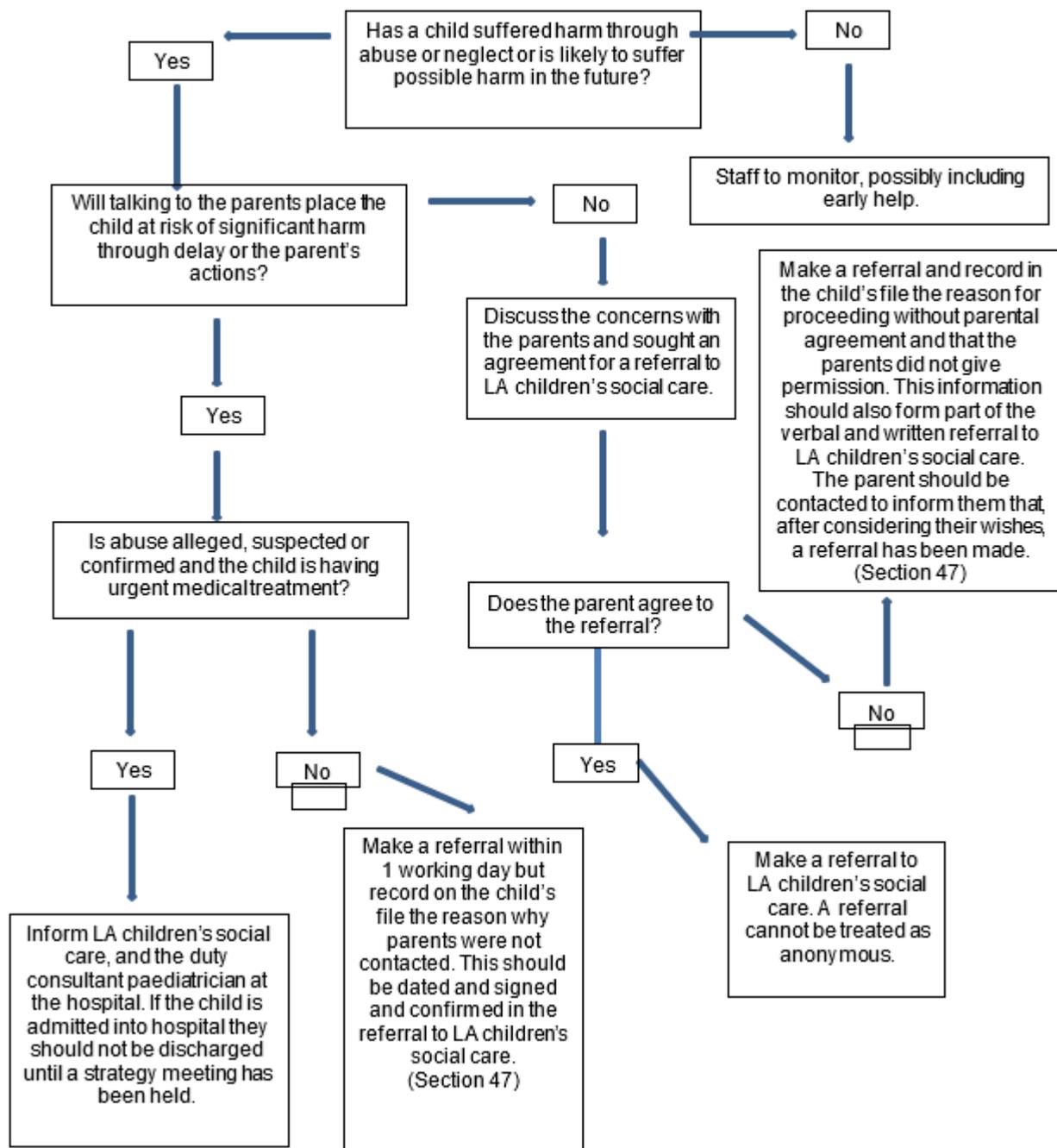
APPENDIX 3 - SAFEGUARDING NIGGLE

<b>Date</b>	
<b>Time</b>	
<b>Name of Child</b>	
<b>Class</b>	
<b>Date of birth</b>	
<b>Niggle</b>	
<b>Evidence</b>	
<b>Staff Member</b>	
<b>Position</b>	
<b>Signature</b>	
<b>Date</b>	
<b>Designated Safeguarding Lead</b>	
<b>Signature</b>	
<b>Date</b>	
<b>Action</b>	

*A copy should be saved on the teacher's drive and another copy should go directly to the Designated Safeguarding Lead*



APPENDIX 4 - SAFEGUARDING PROCEDURE





APPENDIX 5 – SAFEGUARDING BASIC TRAINING

Key Points to Note	Please tick to show you have read
All staff have a responsibility to report child abuse or suspected child abuse.	
The Parsons Green Prep Designated Safeguarding Lead (DSL) is <b>Marina Hobden</b> . If she is not available contact a Deputy Safeguarding Lead – <b>Lee Bradshaw, Samantha Porter or the Headteacher</b> . In addition, you are aware of the responsibilities of the DSL.	
You have received a copy of part one of Keeping Children Safe in Education (September 2021) (KCSIE) ) and Annex B if you are a school leader or work directly with children	
You have completed an online Educare course on safeguarding.	
You have received a copy of the Safeguarding Children Policy. An updated version is always available in the staff policies file kept in the staff room, on the Teacher drive of our computer network or on our website.	
The policy explains the different types of abuse: physical, emotional, neglect, sexual and peer-on-peer abuse.	
The policy outlines indicators of abuse. These factors should not be considered in isolation but viewed within the context of the child's overall demeanour and our knowledge of the situation.	
If you suspect abuse or witness you must inform the Designated Senior Lead immediately.	
<p>If you are approached by a pupil:</p> <ul style="list-style-type: none"> <li>• Listen but <b>never</b> promise to keep confidence.</li> <li>• Do <b>not</b> ask leading questions but you can ask: Who? What? Where? When?</li> <li>• Do write detailed notes (with names, dates, times and your signature) afterwards about what they told you using the safeguarding niggler form.</li> <li>• Give this record straight away to the Designated Senior Lead.</li> <li>• Do <b>not</b> investigate.</li> </ul>	
If you have a concern or are told about a concern and the subject is a member of staff you must inform Tim Cannell immediately who is the Headteacher.	
If you have a concern or are told about a concern and the subject is the Headteacher you must inform the Proprietor immediately.	
If you have a concern or are told about a concern and the subject is the Proprietor you must inform the Headteacher immediately.	
The Designated Safeguarding Lead may take the concern to Hammersmith & Fulham Social Services.	
If you are concerned that a child is in immediate danger you should always call the Police on 999 and Hammersmith & Fulham Social Services Front Door team on 0208 753 6600. (Full address details in our policy)	



<p>All staff, peripatetic, agency staff, volunteers and work experience students have a responsibility to ensure that children are safe from harm. Some key things that you should ensure are:</p> <ul style="list-style-type: none"> <li>• your bags are securely stored</li> <li>• any medication is securely stored</li> <li>• if you are taking medication you check with your doctor that it will not affect your ability to look after children or work near to children</li> <li>• you do not use your mobile phone camera or other personal camera equipment to photograph our pupils</li> <li>• you do not transport pupils in your car</li> <li>• you do not have any one-to-one sessions with a pupil in a secluded space - choose a place that has a door open or a viewing panel.</li> </ul>	
<p>I confirm I have read, discussed and understood with the DSL and Headteacher the following policies:</p> <ul style="list-style-type: none"> <li>• Safeguarding and Child Protection Policy</li> <li>• Behaviour Policy</li> <li>• Staff Code of Conduct (Appendix 5 of the Safeguarding and Child Protection Policy)</li> <li>• E-safety policy</li> <li>• Children Who Go Missing in Education Policy</li> </ul> <p>I confirm I know the safeguarding response to children who go missing from education.</p>	

I have read and understood the information in this document.

Name

Signature

Date



## APPENDIX 6 - STAFF CODE OF CONDUCT

The code of conduct clarifies what is expected in terms of professional behaviour; it gives clear advice about what constitutes illegal behaviour and what might be considered as misconduct. It also describes safe practice and which behaviours should be avoided. If a member of staff does not follow this code of conduct this may lead to disciplinary procedures.

There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by this employer. It is expected that in these circumstances staff will always advise their senior colleagues of their justification for any such action taken or proposed.

### **Core principals**

- the welfare of children is paramount
- staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any responsible person to question their line manager or another senior member of staff over any incident, which may give rise to concern
- records should be made of any such incident and of decisions made/further actions agreed
- staff should apply the same professional standards in keeping with the school's Equal Opportunities Policy
- all staff should know the name of their designated person for child protection, be familiar with child protection arrangements and understand their responsibilities to safeguard and protect pupils
- staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them
- staff should be aware of the contents of key policies and have read and understand the procedures outlined in the staff handbook and follow these at all times.

### **Duty of care**

Teachers and other staff are accountable for the way in which they exercise authority, manage risk, use resources, and protect pupils from discrimination and avoidable harm. These guidelines apply to all adults working in education setting whatever their position, roles, or responsibilities.

### **This means that staff should:**

- understand the responsibilities, which are part of their employment or role and be aware that sanctions will be applied if these provisions are breached
- always act, and be seen to act, in the child's best interests
- avoid any conduct which would lead any reasonable person to question their motivation and intentions
- take responsibility for their own actions and behaviour.

### **Allegations & Low-Level Concerns**

The term 'allegation' means that it is alleged that a person 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; or

behaved towards a child or children in a way that indicates they may pose a risk of harm to children.<sup>4</sup>



Chapter 7 of Part A of the London Child Protection Procedures (LCPP) makes it clear that an allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

### **Low-level concern**

It is vital that all staff are fully committed to ensuring that PGP continually strives to create and embed a culture of openness and trust and transparency in which the school's values and expected behaviour which are set out in this staff code of conduct are constantly lived, monitored and reinforced by all staff is fostered within the organisation. It is therefore important for staff to share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern – no matter how small, and 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.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Safeguarding Lead.

PGP ensure that a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

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

### **Procedures for responding to low-level concerns:**

If the concern is raised by a third party, the head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Recording of all low-level concerns is imperative and will be recorded in writing, with details of the concern, the context in which it arose and action taken; the name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.



As with all school logs records of low-level behaviour should be reviewed regularly (at least termly) so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

If a pattern of behaviour is identified, the school will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

There is a duty upon the school and therefore it 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 recurrence.

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

#### Spectrum of behaviour

##### 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.

### **Power and positions of trust**

All adults working with pupils in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people; staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should always maintain appropriate professionalism and, wherever possible, they should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

### **This means that staff should not:**

- use their position to gain access to information for their own advantage and/or a pupils' or family's detriment
- use their power to intimidate, threaten, coerce or undermine pupils.

### **Confidentiality**



Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. Confidential information about pupils should never be used casually in conversation or shared with any person other than on a need to know basis.

**This means that staff:**

- Are expected to treat information they receive about pupils in a discreet and confidential manner
- are expected to maintain confidentiality of all staff meetings and where conversations take place in the hearing of others
- in any doubt about sharing information they hold of which has been requested of them should seek advice from a senior member of staff
- need to be cautious when passing information to others about a pupil.

**Propriety and behaviour**

All staff should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils, parents and the general public.

**This means that staff should not:**

- behave in a manner which would lead any reasonable person to question their suitability to work with pupils or act as a role model
- there may be exceptional circumstances if a member of staff feels that there are exceptional reasons why the general restriction on drinking alcohol with parents where pupils are present should not apply - they should discuss the matter with a senior member of staff
- drink alcohol when supervising pupils or on school trips. This applies even when there are no pupils present as the member of staff may be called to act if an emergency occurs
- staff should not have any connection with pupils through electronic means until over 18 (including email, text messages, phone or letter etc.)
- befriend, socialise with or seek to develop relationships with the parents or pupils beyond that of the professional
- discuss their sexual relationships with or in the presence of pupils
- discuss a pupil's sexual relationships in inappropriate settings or contexts
- make (or encourage others to make) unprofessional personal comments in any form of communications (email, conversations or social networking comments)

**Dress and appearance**

All staff are required to look smart, neat and tidy at all times. Denim jeans, trainers and miniskirts are not allowed. Rubber flip-flops and Ugg boots are also not acceptable or practical. Staff taking a sports lesson may wear sports clothing for the day. Staff should consider the manner of dress and appearance appropriate to their professional role. Staff should ensure that they are dressed decently, safely and appropriately for the tasks they undertake.

**This means that staff should ensure that their appearance and clothing:**

- promotes a positive and professional image, including ensuring that for male staff facial hair is either well shaved or trimmed and neat
- is appropriate to their role
- is not likely to be viewed as offensive, revealing, or sexually provocative.

**Gifts**

Staff should be aware of their contractual obligations regarding arrangements for the declaration of gifts received and given. Staff need to take care that they do not accept any gift



that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when pupils or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a thank you, and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Any member of staff concerned about whether they or their colleague may be at risk of giving or receiving a bribe (financial or otherwise) should contact the Headteacher. Any member of staff receiving gifts or entertainment valued at more than £100, must disclose this to the Headteacher. Members of staff may not give personal gifts to pupils. It is acceptable for staff to offer prizes of small value in certain tasks or competitions

**This means that staff should:**

- ensure that gifts received or given in situations which may be misconstrued are declared
- ensure that gifts over £100 in value are declared
- only give gifts to an individual young person as part of an agreed reward system
- where giving gifts other than as above, ensure that these are of insignificant value and given to all pupils equally.

**Infatuations**

- staff should avoid being in a room alone with a pupil as much as possible. If they are preferably the door should be left open or at the very least both the teacher and the pupil should be visible from a window
- report to senior colleagues any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff
- be mindful if they are alone in a room with a pupil
- leave the door open if you have to.

**Communications with pupils**

Adults should not share any personal information with a pupil. They should not request, or respond to, any personal information from the pupil, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Staff should not have any social media or personal email contact with any pupil or parent. Staff should not give out their personal contact details to pupils including email, home or mobile telephone numbers, unless the need to do so is agreed with the Headteacher and parents. Email or text communications between an adult and a pupil outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based web sites, such as social networking, instant messaging or gaming.

**This means staff should:**

- Not use internet or web-based communication channels to send personal messages to a pupil
- not have images of pupils stored on personal cameras, devices or home computers (refer to e-safety policy for guidance regarding photos)
- not make images of pupils available on the internet, other than through the school network/website, without permission from parents and senior teachers
- not have social media contact with ex-pupils until they are aged 18
- not give out their personal contact details to parents or children without the express permission of the Headteacher.

**Social networking sites and online gaming**



Staff may use social networking sites for personal use but must not access them on school equipment. Staff must deny current or recent pupils or parents access to your profile so you do not put yourself in a vulnerable position. Staff should be aware that they leave themselves open to a charge of professional misconduct if images or comments of/by a member of staff in a compromising situation are made available on a public profile by anyone. If you are in any doubt, seek the advice of the head.

**This means that staff should:**

- lock down their profile to ensure that data and images are not freely available. Seek advice if you are unsure how to do this
- not permit current and recent pupils or parents to have access to your profile
- ensure all your passwords are kept strong and secure
- be aware that images of others should be protected and treated as carefully as you would your own
- for staff with personal friends who are parents at the school, social networking is acceptable but caution must be exercised so that professional standards are maintained and staff do not compromise themselves or the school.

**Use of mobile phones and devices**

- Personal mobile telephones may only be used in the staff room or in the school office or in a classroom where no children are present (the designated areas).
- Personal mobile telephones should be switched off or in 'silent' mode and out of sight when outside of the designated areas.
- The use of personal mobile phones is not allowed in any place whilst contact with children is taking place.
- In EYFS classrooms mobile telephones must be kept in a lockable drawer.
- Staff must not use personal mobile phones to photograph our pupils. (please refer to our e-safety policy)

**Physical contact**

There may be an occasional time when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate. Staff should use their professional judgement at all times about the appropriateness of any physical contact. Physical contact should never be secretive, or for the adult's benefit, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be made clear to senior staff.

**This means staff should:**

- be aware that even well intentioned physical contact may be misconstrued by the pupil, an observer or by anyone to whom this action is described
- never touch a pupil in a way which may be considered indecent
- always be prepared to explain actions and accept that all physical contact be open to scrutiny
- during activities which require physical contact staff should consider alternatives where it is anticipated that a pupil might misinterpret any such contact
- where necessary consider involving other members of staff, or a less vulnerable pupil in any demonstrations
- staff should seek permission before physical contact is made or make it clear why it may be needed, e.g. offering support in gymnastics.



### **Showering and changing**

#### **Staff should not:**

- change in the same place as pupils
- shower with pupils.

#### **Behaviour management**

Staff should follow the school Behaviour Policy.

#### **Staff should:**

- not use force as a form of punishment
- adhere to the school's Behaviour Policy.

### **Extracurricular activities**

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after school. During school activities that take place off the school site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in the position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. A list of rooms and staffing should be handed into the office.

#### **This means staff should:**

- always have another adult present in out of school activities, unless otherwise agreed with senior staff in the school
- undertake a risk assessment
- have parental consent to the activity
- ensure that their behaviour remains professional at all times
- follow guidance produced for staff when supervising extracurricular activities which can be found in the Staff Handbook.

### **First aid and administration of medication**

- The school has an administration of medication policy, which must be adhered to at all times.

### **Photography, videos and other creative arts**

- Staff need to be aware of the potential for these aspects of teaching to be misused for pornographic or 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken.

#### **This means staff should:**

- refer to the photo consent spreadsheet held on the T:drive photo library to check that children are cleared for the relevant media (eg school website, social media etc)
- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- ensure that all images are available for scrutiny in order to screen for acceptability
- be able to justify images of children



Images should not be displayed on other websites, in publications or in a public space if consent has not been given by parents on the child's photo consent form.

**Staff should not:**

- have images of pupils stored on personal cameras, devices or home computers
- make images of pupils available on the internet, other than through the school network/website with permission from parents and senior teachers.

**Internet use**

The school has a clear policy about access to and the use of the internet. Please refer to the E- safety policy for further guidance. Under no circumstance should adults in the school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is illegal and, if proven, will invariably lead to the individual being barred from work with children and young people. Using school equipment to access inappropriate or indecent material, including adult pornography, would normally lead to disciplinary action, particularly if as a result pupils might be exposed to inappropriate or indecent material.

**Reporting a wrongdoing (Whistleblowing Policy)**

This policy applies to all school employees and contractors working for the school. It also applies to volunteers and others not within an employment contract, although the provisions of the Public Interest Disclosure Act do not protect them. It is not to be used by individuals who are aggrieved about their personal position. The school's grievance procedure should be used under those circumstances.

**Sharing concerns and reporting incidents**

**This means staff:**

- should be familiar with Parsons Green Prep School's Child Protection procedures as outlines in the Safeguarding Children Policy.
- should take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the school or workplace – see Safeguarding Policy for further information.