
Claires Court Safeguarding Child Protection Policy

<http://schl.cc/3i>



Statement of intent

Claires Court wants to safeguard and promote the welfare of children who are pupils at the School, including EYFS or in attendance at our various Holiday Club activities, which complies with the Department for Education (DfE) Keeping Children Safe in Education September 2021 (KCSIE 2021) - statutory guidance for schools and colleges - and has regard to Working Together to Safeguard Children (2018) (WTTSC). This policy is also informed by and complies with the Relationship Sex (RSE) and Health education guidance (2019) and the Prevent 2015 (updated 2021) duty guidance. To this effect, the Principals ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare and that our safeguarding arrangements reflect the RBWM protocols for assessment (below) and The [multi-agency safeguarding arrangements](#) board (replacing the LCSB).

The welfare of pupils at Claires Court is safeguarded and promoted by the drawing up and effective implementation of our written risk assessment policy at whole school, site, section and department level, and with appropriate action taken to reduce risks that are identified. We recognise specifically the particular vulnerabilities of children with SEN/D to abuse. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and we recognise that 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;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Safeguarding and promoting the welfare of children is everyone's responsibility. No single professional can have a full picture of a child's needs and circumstances. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing, and kept as a confidential record. More information in [Appendix 3](#). Providing early help is more effective in promoting the welfare of children than reacting later. 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. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care. Whilst all staff can contribute to early help, such early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the

child. More can be found on early help in [Appendix 2](#) on Role Description of the Designated Safeguarding Lead, who coordinates responses such as early help and have access to the latest research showing which types of interventions are the most effective.

To ensure effective management of this and related policies and its implementation, we cause, at least two times a year, independent external scrutiny of our work in Safeguarding and Child Protection, and that scrutiny includes compilation of an annual report to the Principals and also reports on the efficiency with which the related duties have been discharged. In addition, we have independent scrutiny of all of our H&S procedures and activities related to the same, with multiple visits during the academic year. The Principals review reports arising from such visits, and take action to ensure that any deficiencies or weakness in safeguarding/child protection arrangements as identified by these reports (or for any other reason) are remedied without delay.

This policy applies to all employed members of staff, and to those contractors who have regular access to the school, and are listed as such on our central register of employment. The categories of staff include full and part time staff of all categories, peripatetic music and other visiting staff who are self-employed and those volunteers who also are included as regular in attendance at school. The Principals take a proportional risk based approach to the level of information that is provided to temporary staff and volunteers, and are guided by both a professional HR department and independent safeguarding visitors who check our procedures. The policy also includes guidance on procedures when a member of staff, volunteer, Designated Person for safeguarding and child protection (DSL), Head or one of the Principals faces allegations of abuse.

This Policy will be reviewed annually or earlier by the Executive headteacher and Lead DSL in the case of a significant change in any relevant legislation or regulatory guidance, and provide annual report to the Principals, who recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. School leadership, management and staff contribute to and shape safeguarding arrangements and child protection policy, these being standing items on the regular staff room meetings, together with review conducted by the independent chairs of common room, who represent staff views and report back to Heads and Principals accordingly.

September 2021

We are adhering to the latest government guidance as of September 2021 which can be found [here](#). Our latest Guidance from the local authority on Covid practice is found [here](#) on our Risk assessment.

CLAIRES COURT/Independent Schools Inspectorate - Safeguarding Prompts for Remote Teaching - <http://schl.cc/7Z>

Should at any stage one of the nominated DSLs, whether at lead level or deputy, we have good cover in place led by Justin Spanswick, overseen by James Wilding, to ensure DLS oversight at each section remains in place.

CHILD PROTECTION AND SAFEGUARDING POLICY

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	Mandy Burrows TEL: 07774332675 EMAIL: LADO@achievingforchildren.org.uk
Local Authority Children's Social Services	TEL: 01628 683150 EMAIL: mash@achievingforchildren.org.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01344 786543
Multi-Agency Safeguarding Hub	TEL: 01628 683150 EMAIL: mash@achievingforchildren.org.uk
Support and Advice about Extremism	Police liaison PC 6351 Angela Ferrucci TEL: 101: Thames Valley Police EMERGENCY: 999 NON EMERGENCY NUMBER: 101 MOBILE: 07968 190529 EMAIL: Angela.ferrucci@thamesvalley.pnn.police.uk Local Authority Royal Borough of Windsor and Maidenhead TEL: 01628 683800 Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk NSPCC website
Disclosure and Barring Service	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: dbdispatch@dbs.gsi.gov.uk
Teaching Regulation Agency	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk
ISI Safeguarding Children	TEL: 020 7600 0100

KEY SCHOOL CONTACT DETAILS

<p>Proprietors</p>	<p>Proprietors Mr James Wilding (Academic Principal and Head of Senior Boys) TEL: 01628327615 EMAIL: jtw@clairescourt.net</p> <p>Mr Hugh Wilding (Administrative Principal) TEL: 01628 327715 EMAIL: hsw@clairescourt.net</p> <p>Independent Safeguarding Auditor Mrs Sue Manser EMAIL: sue_manser@hotmail.com</p>
<p>Designated Safeguarding Lead (DSL)</p>	<p>Whole school DSL Mr Justin Spanswick TEL: 01628 327717 EMAIL: jms@clairescourt.net By letter to Claires Court, 1 College Avenue, Maidenhead, SL6 6AW</p> <p>Whole school Deputy DSL Mr Stephen Richards TEL: 01628 327524 EMAIL: smr@clairescourt.net</p> <p>Whole school EYFS DSL Mr Justin Spanswick TEL: 01628 327717 EMAIL: jms@clairescourt.net</p>
<p>Designated Teacher for Looked After Children</p>	<p>Mr Justin Spanswick TEL: 01628 327717 EMAIL: jms@clairescourt.net</p>
<p>Site Specific DSL's:</p> <p>Senior Boys site</p> <p>Deputy DSL (Senior Boys)</p> <p>Junior Boys site</p> <p>Deputy DSL (Junior Boys)</p>	<p>Mr Philip Bowen TEL: 01628 327600 EMAIL: phb@clairescourt.net</p> <p>Mrs Nicola Bose TEL: 01628 327600 EMAIL: njb@clairescourt.net</p> <p>Mr Dean Richards (Deputy Head, Junior Boys) TEL:01628 327421 EMAIL: ddr@clairescourt.net</p>

<p>College site (Girls, Nursery and Sixth form)</p> <p>Deputy DSL (college site)</p>	<p>Mrs Jane Webster TEL: 01628 327456 EMAIL: jlw@clairescourt.net</p> <p>Mr Stephen Richards (Headteacher) TEL:01628 327524 EMAIL: smr@clairescourt.net</p> <p>Mrs Leanne Kirby (Headteacher of Juniors & Nursery) TEL: 01628 327581 EMAIL: lek@clairescourt.net</p>
<p>SEND/Inclusion Lead</p>	<p>Mrs Wendy Kearney TEL: 01628 327646 EMAIL: wek@clairescourt.net</p>
<p>Elective Home Education Co-ordinator</p>	<p>Harmit Thiara EMAIL: Harmit.thiara@achievingforchildren.org.uk</p>

Our overarching Designated Safeguarding Lead (Lead DSL) is **Justin Spanswick**, Executive Head at Claires Court. He is the Safeguarding Children manager and is responsible for the implementation of this policy. He works closely with the Principals of the school and reports to the Academic Principal, James Wilding on all matters including safeguarding.

Justin Spanswick includes in his brief explicit responsibility for matters relating to after-school care and Holiday Club, where such activities are out of school term time as well as ensuring that the Prevent anti-radicalisation strategy is understood and implemented in the school. All 5 school nurses are also DSL trained. The Deputy DSL for the whole school is Steven Richards.

The proprietor with specific responsibility for safeguarding is James Wilding, Academic Principal. He receives identical training to the school DSLs and in addition other specialist training appropriate for proprietors and employers. He is responsible for the employment of staff and specifically for the Human Resources Department, who manage our appointments and central record of employment. See Recruitment of Staff for further information. The training of all DSLs is conducted by the Royal Borough of Windsor and Maidenhead (RBWM) Local Safeguarding Children Board, takes place at least annually, and includes higher-level safeguarding, inter-agency working and the [Prevent](#) strategy. We are audited a minimum of twice a year by an independent Safeguarding expert, Sue Manser, who makes recommendations and inspects practice and process, and ensures effective management of Safeguarding at Claires Court.

Aims

Our aims at Claires Court are to:

- ◆ create an environment in the School which encourages children to develop a positive self image, regardless of race, language, religion, culture or home

background;

- ◆ 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;
- ◆ encourage children to develop a sense of autonomy and independence;
- ◆ enable children to have the self confidence and the vocabulary to resist inappropriate approaches;
- ◆ give the children the right help at the right time to address risks and prevent issues escalating;
- ◆ specifically raise children’s awareness of the benefits and dangers inherent with computer activities, associated technologies and online working; and
- ◆ ensure that everyone within our school establishment 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.

POLICY STATEMENT

This policy applies to Claires Court School which includes the EYFS setting. This policy is reviewed and updated annually³ and is available on the School website.

This policy has regard to the following guidance and advice⁵:

- [Keeping Children Safe In Education](#) September 2021 (*KCSIE 2021*)
 - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- [Working Together to Safeguard Children](#) (July 2018)
 - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- [Revised Prevent Duty Guidance for England and Wales](#) (July 2015)
 - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
 - [The use of social media for on-line radicalisation \(July 2015\)](#)

This policy also takes into account the procedures and practice of RBWM [Threshold information/cue card](#). as part of the inter-agency safeguarding procedures set up by the new [multi agency safeguarding arrangements](#) team.

Contextual Safeguarding

At Claires Court we recognise the importance and value of Contextual Safeguarding.

Contextual Safeguarding can be defined as an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships.

We therefore support our Local Authority in engaging with different sectors to establish the best outcomes for our pupils, and we train our staff through internal measures to support them in recognising how social contexts can have such an impact on vulnerable children.

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.

The School has arrangements for listening to children and providing early help. Details of these arrangements can be found in Section.

CHILD PROTECTION

Child Protection forms a major part of safeguarding and promoting welfare. Child protection is the actions that are taken to protect a child who is experiencing significant harm, or who is likely to experience significant harm. While Safeguarding refers to the culture of care and support within the school setting, Child Protection refers to the activity undertaken to protect the child. At Claires Court, staff understand the difference between the two terms, and are aware of their responsibilities of how they can help to promote safeguarding at school, and how they are an integral cog in the team that seeks to ensure that every child is safe. Staff receive regular training and updates from the DSL team and are aware that advice from the school network team is always readily available.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

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

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

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

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.}

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The school has a dedicated Safeguarding form which staff are trained to fill in for the event of a safeguarding concern. The form records the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. For further information see our [procedures](#). Where the allegation relates to harmful sexual behaviours, if possible the disclosure is managed with two members of staff present (one of them being the Designated Safeguarding Lead or their deputy).

Where there is a safeguarding concern, the School will ensure the [pupil's wishes](#) and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School operates its processes with the best interests of the pupil at their heart.

Early Help

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

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.

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.

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

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL using the [correct Claires Court documentation](#) as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL (should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

If staff (including volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's multi-agency safeguarding arrangements from the Local authority can be found [here](#). A full copy of their [local procedures](#) can be found in paper format if required in the school.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments following consultation with local partners, such as the Police and our own Safeguarding internal audit, of the potential risk in the local area. Such risk assessments are

discussed with the Head, DSL and DDSL and James Wilding, the Proprietor responsible for safeguarding, to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

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

What staff should do if a child goes missing from education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are [here](#). Further details can also be found at Appendix 1 of this policy. Our Educational Welfare can be contacted on pippa.tolfree@achievingforchildren.org.uk

The School will report to RBWM a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more. Further information can be found on the RBWM policy [here](#).

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

Against

Staff, volunteers, site DSL
Head of site
Lead DSL
School Principals
(policy)

Should be reported to

Head of the respective site*
Justin Spanswick, the Lead DSL**
James Wilding, Academic Principal***
LADO (contact details shown on page 1 of this policy)

*In the absence of the Head, the allegation should be passed to the Academic Principal as Lead DSL. The Head will always be kept informed of any allegations against staff or volunteers working at their respective site.

**If the allegation concerns the Head, the person receiving the allegation should immediately inform Justin Spanswick as Lead DSL without notifying the Head first.

***If the allegation concerns the Lead DSL, the person receiving the allegation should immediately inform James Wilding as Proprietor with responsibility for safeguarding without notifying the Head first.

The School will adhere to the statutory guidance on dealing with allegations of abuse in force at the time, with any further action - including investigation - taken only with the agreement of the LADO or Duty Social Worker. The following key principles apply:-

- We will consider and thoroughly investigate any allegation expeditiously, fairly and consistently, avoiding all unnecessary delays. The aim will always be to

ensure a quick resolution to the benefit of all concerned; the nature, seriousness and complexity of the allegation will have a bearing on timescales.

- In the first instance, and always prior to any internal investigation taking place, the School will contact the LADO at RBWM for further professional advice and discussion within one working day. We will discuss with the LADO the content and context of the allegation and will agree a course of action, including any involvement with the Police. Discussions will be recorded in writing and communication with both the individual and parents of the child/children agreed. For the avoidance of doubt, the School does not require parental consent before reporting allegations to the LADO.
- In the case of serious harm, the Police will be informed from the outset.
- Where appropriate, the person who is subject of an allegation will be notified as soon as is practicable and will be provided with as much information as possible at that time (NB: in some instances the School may not be permitted to disclose full details).
- Suspension will never be a default option; the School will always consider whether the circumstances warrant suspension and/or reasonable alternative arrangements (such as redeployment or working under supervision) are appropriate before a final decision is given in this regard. The LADO's views will always be taken into consideration. However, the Academic Principal will always have the final decision on suspension. The individual will be notified of the reasons and justification for suspension and provided with a named contact within one working day. The school will not conduct an investigation before reporting the case to the LADO.
- Allegations that are found to have been malicious will be removed from personnel records. We will not refer to any unsubstantiated, unfounded or malicious allegations in employer references. (Pupils making malicious allegations will be dealt with under the School's behaviour policy.)
- Whilst care will be taken to ensure the effective protection of the child making the allegation, we will always provide appropriate support to the person who is the subject of the allegation.
- There are restrictions on the reporting or publishing of allegations against staff and the School will take all reasonable steps to ensure that confidentiality is maintained and guard against unwanted publicity while an allegation is being investigated. These restrictions apply up to the point where the accused is charged with an offence, or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.
- If the subject of an allegation chooses to resign their employ, the School will continue with its investigation and will make every effort to reach a conclusion regardless of whether the individual chooses to assist the investigation.

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

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be

found [here](#). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS (including sexting)

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sexting, sexual assault, gender-based issues, hazing and initiation rituals, upskirting and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust and will be taken seriously.

The School recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra [pastoral support](#) for those children. The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. The School takes the following steps [to minimise the risk of peer-on-peer abuse](#).

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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the multi-agency safeguarding arrangements put in place by the Local Authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Local authority, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the MASH team and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Advice is sort from the Sexual harrassment and sexual violence document linked in KCSIE 2021 and found [here](#). If the DSL decides to make a referral to children’s social care and/or a report to the police against a victim’s wishes, the reasons should be explained to

the pupil and appropriate specialist support offered. It is clear to all staff that anyone can make a referral and does not require parental consent if the child is deemed at significant risk of harm. Advice on when to contact the police can be found [here](#).

The School's approach to sexting follows our guidance to all sexual harassment allegations. The definition of sexting: 'Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages' (NSPCC website).

It is against the law for a child to: take an explicit picture of another child, to share or store or eve download that image, regardless of whether there is consent from the person being photographed. Therefore, all aspects of sexting will be reported to the police, and the police will decide if it becomes a criminal offence or not. The school supports all parties in this matter and appropriate sanctions are put in place in accordance with the [behavior and discipline policy](#).

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the school in line with our pastoral care plans, and support from external agencies will be sought, as appropriate.

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

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

New guidance emerging from the DfE which came into force on 1 September 2021 also highlights matters for schools to take into consideration when tackling matters of peer on peer abuse, sexual harassment, serious violence and supporting victims of abuse.

The school ensures that any report of abuse will be taken seriously and every victim will be supported. Children will never be made to feel ashamed or that that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

Serious Violence, County Lines and CCE

Staff are aware of the indicators of serious violence and procedures to deal with such incidents which can be found [here](#). All staff are trained manage a report of child-on-child sexual violence and sexual harassment; this has been prioritised further in the light of current advice and national highlights of need. Furthermore, be aware of their role in the local 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.

Indicators of serious violence include:

- Marks on the body
- Poor attendance/punctuality
- Looking for new groups of friends/older friends
- Change in attitude and appearance
- New possessions

To support this, staff are directed to the [CCE \(Child Criminal Exploitation\) link](#). County Lines is the term used "when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine and crack cocaine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment." ([National Crime Agency 2019](#))

All staff are aware of the associated risks and understand the measures in place to manage these issues. Further advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and multi agency safeguarding arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

All staff understand that if they receive an allegation that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity against another member of staff, or they have concerns about the behaviour of another member of staff, the matter should be reported immediately to the Head or the DSL.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

KCSIE 2021 divides allegations into two categories;

- allegations that may meet the harm threshold
- allegations or concerns that do not meet the harm threshold, known as 'low level concerns.

1. Allegations that may meet the harm threshold

This procedure will be used in respect of all cases where an allegation indicates that a person poses a risk of harm if he or she continues to work in his/her present position. It should be followed where it is alleged that a member of staff (including a volunteer, student, person on supply and contractor) 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 s/he is unsuitable to work with children

This will include cases of verbal abuse

- behaved or may have behaved in a way that indicates s/he may not be suitable to work with children.

There may be up to 3 strands in the consideration of an allegation:

- a police investigation of a possible criminal offence
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services
- consideration by the School of disciplinary action in respect of the individual.

The School's complaints procedure will be followed alongside this policy.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline

cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head or to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head and Executive Head informed. Where the Executive Head, Head or DSL is absent or is the subject of the allegation or concern, reports should be made to James Wilding. Where the Head or DSL is the subject of the allegation or concern, the Head or DSL must not be informed of the allegation prior to contact with the school proprietor. If the allegation is about the Proprietor the LADO must be contacted. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager/handler should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE 2021* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report

promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

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

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

2. Concerns that do not meet the harm threshold - Low Level Concerns Policy

For full details, please refer to KCSIE, Part 4.

The school has policies and procedures in place for dealing with concerns, including allegations, which do not meet the harm threshold (as defined above). Such concerns may arise from a range of sources, including suspicion or complaint, or a disclosure from a child, a parent, a member of staff or another adult. A concern may also arise from the undertaking of vetting checks. The School will follow its procedures to identify, undertake and record any necessary action. Such procedures include, but are not limited to;

- complaints procedure
- staff code of conduct
- staff disciplinary and grievance procedures
- this policy

As part of its safeguarding procedures, the school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. The term 'low level' does not mean that a concern is insignificant, but defines it as not meeting the 'harm threshold' as cited above. Such a concern, however small, may indicate that a member of staff, supply staff or a volunteer may have acted in a way that;

- is inconsistent with the staff code of conduct
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

Further examples of low level concerns are identified in the staff code of conduct, which should be consulted for more detailed information. It is important that any such concerns are reported through the usual channels, usually to a DSL or the Head or Nursery Manager, as relevant. Where low level concerns are substantiated, the school will respond in a positive, sensitive and proportionate manner, undertaking any necessary action, including supporting the individual in correcting any unsuitable behaviour at an early stage.

Any low level concerns or allegations relating to agency supply staff or third party employees will also be reported to their employers so that appropriate action can be taken and any patterns of inappropriate behaviour across different institutions can be identified.

Details of low level concerns or allegations will be recorded in writing, the record including the details and context of the concern, the person reporting the concern and any action taken. If the individual who reports the concern wishes to remain anonymous, this should be respected as far as reasonably possible.

Records will be held securely and kept confidential, in line with data protection requirements. Records will be reviewed on a periodic basis so that any potential patterns can be identified. If such a pattern is identified, the school will decide what action should be taken, including consideration of whether to deal with the situation under part one of this procedure, above. Consideration will also be given to whether a pattern gives rise to any issues relating to the culture of the school, which will result in appropriate action being taken, including the provision of additional training. Records will be retained in accordance with the school's retention of records and information policy, usually at least until the person leaves the school's employment. Details of low level concerns or allegations will not be included in references, since KCSIE 2021 notes that only substantiated safeguarding allegations should be mentioned in such a situation.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE 2021* and a copy will only be provided to the individual concerned⁷¹.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

The School's staff code of conduct can be found [here](#). The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of an allegation of harm to a pupil.

Further notes on responding to a low level concern or allegation

This section of the Safeguarding Child Protection policy serves as the school's Low Level Concerns Policy, and should be read in conjunction with the staff code of conduct, and other relevant school documentation. In responding to a low level concern, the Head will

- speak directly to the person who raised the concern, unless it has been raised anonymously, or identified by the Head him/herself
- speak to the individual involved and any witnesses
- use the information to help categorise the behaviour which causes concern and determine what further action may be needed; implement such action
- keep a record, as detailed above, including the rationale for decisions and action taken.

Upskirting

As defined in KCSIE 2021, "Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment." We deal with such instances in the same manner as other forms of sexual harassment, with sanctions and support in place for perpetrators and victims.

Whistleblowing Policy

The School aims to create and maintain an environment where staff feel supported in their safeguarding role and able to raise concerns, including about poor or unsafe practice and potential failures in the School's safeguarding regime. The School has a separate Whistleblowing policy shown as Annex 8 - this has its own section within the staff handbook; a copy may also be requested from HR in confidence. All staff are required to report to the DSL, Head or to the Academic Principal in the Head's absence, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Further Government advice on whistleblowing can be found here - <https://www.gov.uk/whistleblowing>

SAFER RECRUITMENT

The School is committed to safer [recruitment processes](#). Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

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

MANAGEMENT OF SAFEGUARDING

The School's DSL is Mr Justin Spanswick who is a member of the leadership team, and his deputy is Mr Steve Richards, although each site has its own DSL and DDSL. The DSL contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the proprietor to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt with support from the school Registrar.

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

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the emergency contact is Justin Spanswick or James Wilding.

Full details of the DSL's role can be found at Annex B of *KCSIE 2021*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training are in line with advice from RBWM and the relevant safeguarding organisations.

All Staff

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

- the child protection policy;
- the role and identity of the DSL(s)
- the behaviour policy
- the [staff code of conduct](#) including the [School's whistleblowing procedure](#) and the acceptable use of I.T. policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE 2021 and Annex B, and the whole document*
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE 2021 (and Part five of KCSIE 2021)*.

Copies of the above documents are provided to all staff during induction. If there are circumstances which mean we cannot give him/her a copy of *KCSIE 2021* to read (for example by way of language or lack of literacy) we ensure that they understand the key information. This may only happen where the risk assessment on appointment identifies them as not being 'workers with children'; for further information, please contact the Lead DSL.

Temporary staff and volunteers are provided with [relevant information](#).

All staff are also required to:

- Read *KCSIE 2021* and confirm that they have done so. Each time *KCSIE 2021* is updated by the Department for Education, staff will be updated on the changes via an oral communication/presentation by the lead DSL and relevant links to the changes for their own reading..
- Understand key information contained in *KCSIE 2021*. The School will ensure staff understanding by explaining all aspects of the documents that are relevant, and hold workshops for staff to voluntarily join should they have any further questions.
- Receive training in safeguarding and child protection regularly, in line with advice from the multi-agency safeguarding arrangements from RBWM. Training will include online safety (SmartLog training) and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example emails, staff meetings and discussions.

DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of

radicalisation, record keeping and promoting a culture of listening to children, training in the LA's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for School leaders and the DSL are set out in Annex B of *KCSIE 2021*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Justin Spanswick is the Executive Headteacher and Mr James Wilding is the board-level designate to take a lead in relation to responsibility for the safeguarding arrangements in the School. Mrs Sue Manser is the visiting independent Safeguarding auditor.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. There is an annual audit which takes place using the RBWM documentation alongside ISI regulatory requirements, with all DSL's and the Proprietor present. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

As proprietor and academic principal, James Wilding ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviour in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's curriculum and also embedded in [PSHE and sex and relationships education \(SRE\)](#).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes harm. Further details of the School's approach to online safety can be found in the [Acceptable use of ICT policy](#) (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure

that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

Looked after children

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

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

Arrangements for visiting speakers

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

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

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. Arrangements can be found in our [Safeguarding for Visitors](#) leaflet and in [Appendix 5](#).

Extra guidance to Safeguard pupils who are taught in 1:1 lessons is [available](#).

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. This forms part of the School's safer recruitment practices, further details of which can be found in the School's [Recruitment and Selection Policy](#).

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register.

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

Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found [here](#). Staff who wish to take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their written and signed Risk Assessment form and approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Justin Spanswick.

Duty to notify Ofsted and ISI

The School will inform Ofsted and ISI of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted/ISI as soon as reasonably practicable, but at the latest within 14 days of the date the School becomes aware (or ought reasonably to have become aware) of it.

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

Justin Spanswick and James Wilding
25 September 2021
Annexes follow.

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. HM guidance can be found [here](#). Please note that concerns should be reported by staff to the DSL.

All staff must challenge abusive behaviours between peers. In this way and by other proactive means, ensure our procedures minimise the risk to peer-on-peer

abuse., They must also ensure that they use the he systems in place for children to confidently report abuse, knowing their concerns will be treated seriously.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); sharing pictures of nudes and semi- nudes, inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

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

Child sexual exploitation: is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

So called 'honour based' violence: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on

FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate¹⁵⁵. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures and [multi agency practice guidelines](#).

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for

which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Harm

What is harm?

This is not defined in legislation. DBS view harm as its common understanding or the definition you may find in a dictionary. Harm is considered in its widest context and may include:

sexual harm, physical harm, financial harm, neglect, emotional harm, psychological harm, verbal harm.

This is not a fully comprehensive list, harm can take many different forms.

What is the harm test?

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

Prevent

The most up to date guidance on Prevent can be found [here](#).

The school assesses the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This is based on an understanding, shared with partners, most notably Thames Valley Police, of the potential risk in the local area.

As with all other issues of safeguarding, we aim to prevent people from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk, and intervening as appropriate. Referrals will be adjusted to respond to the level of risk to identify the most appropriate route, which could include Channel or RBWM Children's Social Care.

As guided by the Staff Code Conduct, any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised.

Staff training

The school makes sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. This comes through discussion, and through Smartlog.

They should know where and how to refer children and young people for further help.

Prevent awareness training will be a key part of this.

IT policies

The school ensures children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of

filtering, using both Smoothwall and Sophos to check, monitor, manage and filter usage.

Special educational needs and/or disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These 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 SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers and managing or reporting these challenges.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi or trans (LGBT): Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Children who go missing from school: A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found [here](#) . All unexplained absences will be followed up in accordance with this policy.

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

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

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

School and the local authority. Further information can be found in the school procedures and indicators/risk elements at the [CME Statutory Guidance 2016](#).

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

Appendix 2: Role of Designated Safeguarding Leads

The overarching 'Lead' Designated Safeguarding Lead (Lead DSL) is **Justin Spanswick**, Executive Headteacher of Claires Court Schools. He is the Safeguarding Children Manager and is responsible for the implementation of this policy.

The Lead DSL has explicit responsibility for matters relating to e-safety and after-school care and Holiday Club, the latter where such activities are out of school term time and in his absence, to an alternative DSL, currently the Head of Claires Court Senior Boys.

In term-time, the Principals designate appropriate senior members of staff to take responsibility for safeguarding and child protection, usually the Headteacher and nominated Deputy at each site. These persons have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. The DSL also has responsibility for online safety and works with the network manager who is also DSL trained.

The KCSIE 2021 guidance sets out the broad areas of responsibility to which our DSLs are asked to comply with, having regard for our internal safeguarding policy and in liaison with the Lead DSL as appropriate:

Managing referrals

- Refer all cases of suspected abuse to the local authority children's social care and:
 - The designated officer(s) for child protection concerns (all cases which concern a staff member),
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
 - Police (cases where a crime may have been committed).
 - Liaise with the headteacher(s), Executive Head and School Principals (James and Hugh Wilding) to inform them of issues especially ongoing enquiries under section 17 and 47 of the Children Act 1989 and police investigations.
 - Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

- The DSL should receive appropriate training carried out every two years in order to:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
 - Have a working knowledge of how local authorities conduct a child

protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Training on all matters relevant to online safety and inappropriate use of Social Media and IT
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- DLSs and all professional staff should, in particular, be alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs;
 - has special educational needs;
 - is a young carer;
 - is showing signs of engaging in anti-social or criminal behaviour;
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence and domestic abuse;
 - has returned home to their family from care;
 - and/or • is showing early signs of abuse and/or neglect.

Domestic Abuse

The Domestic Abuse Act 2021 introduced a new definition of domestic abuse, based on the previous cross government definition of domestic violence. The government plans to introduce new statutory guidance for those working with domestic abuse victims and perpetrators, including those concerned with the impact on children. The Act defines domestic abuse as abusive behaviour which includes any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse and is between parties who are
- both over the age of 16
- personally connected (the Act also provides a definition of 'personally connected')

It is important to recognise that many children will be living (or may have lived) in families where domestic abuse is a factor, and that these situations have a harmful impact on children emotionally and psychologically, as well as placing them at risk of physical harm. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Children witnessing domestic abuse is recognised as 'significant harm' in law and can impact on children when they witness it at home and/or suffer it in an intimate personal relationship. Domestic abuse can also be a sign that children are suffering another type of abuse

or neglect.

Domestic abuse may take the form of any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. Types of abuse also include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Controlling Behaviour; a range of acts designed to make a person subordinate and/or dependent by;

- isolating them from sources of support
- exploiting them for personal gain
- depriving them of the means needed for independence, resistance and escape
- regulating their everyday behaviour

Coercive Behaviour; an act or a pattern of acts, assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim

Coercive Control; multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear and has a significant impact on children and young people:

- as a victim in their own right
- due to the impact the abuse has on the non-abusive parent
- may also be forced to participate in the abusive behaviour

The 2021 Act recognises the impact of domestic abuse on children, as victims in their own right. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact

on children. In some cases, children 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.

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

Behaviours such as alcohol and substance misuse, truancy and sexting put children at risk or in danger and safeguarding issues can manifest themselves via peer-on-peer abuse, including cyber-bullying and gender-based violence/sexual assaults.

Raising Awareness

- The DSL should ensure the School's policies are known and used appropriately:
 - The Lead DSL has responsibility for ensuring the safeguarding and child protection policy is reviewed annually, however each DSL is expected to participate in the process and assist with implementation as appropriate
 - Ensure the School's safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals

about suspected abuse or neglect may be made and the role of the School in such activities.

- Link with the LA to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible, though a copy is retained with us. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Appendix 3

Responding to suspicions of abuse

- ◆ We acknowledge that abuse of children can take different forms - physical, emotional, sexual and neglect.
- ◆ When children are suffering from physical, sexual or emotional abuse, or neglect, this may be demonstrated through changes in their behaviour, or in their play.
- ◆ Where such changes in behaviour occur, or where children's play gives cause for concern and there is a possibility of a child suffering significant harm, Children's Services will be consulted.
- ◆ We allow investigation to be carried out with sensitivity. Staff in the School take care not to influence the outcome either through the way they speak to children or ask questions of children.
- ◆ Where a child shows signs and symptoms of neglect or of a failure to thrive , we make appropriate referrals*.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral will be made immediately to RBWM children's social care. This referral can be made by any professional, but would usually be made by the DSL on the appropriate Claires Court site. If any member of staff makes a referral directly to RBWM children's social care, they should notify their DSL as soon as possible thereafter.

Disclosures

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

- ◆ offers reassurance to the child;
- ◆ listens to the child; and
- ◆ gives reassurance that she or he will take action.
- ◆ The member of staff does not question the child.
- ◆ The member of staff must not promise confidentiality.

The member of staff must always refer the matter to the Head or appropriate DSL for the site/section concerned, and complete a written safeguarding concern sheet.

Recording suspicions of abuse and disclosures

Using the Pupil Safeguarding Concern Sheet, staff make a written record of:

- ◆ The child's name;

- ◆ The child's address;
- ◆ The age of the child/their Class;
- ◆ The date and time of the observation or the disclosure;
- ◆ An objective record of the observation or disclosure;
- ◆ The exact words spoken by the child;
- ◆ The name of the person to whom the concern was reported, with date and time; and
- ◆ the names of any other person present at the time.

These Safeguarding Concern records are signed and dated and kept in a separate confidential file under the direction of the Head. All members of staff are trained in the procedures for recording and reporting by written record, making use of the General Communication Notes form or the specific Pupil Safeguarding Concern sheet, as appropriate.

Taking concerns forward

Where the DSL believes a safeguarding concern for a child exists, then s/he will notify the matter to Children's Social Care, RBWM contact Tel: 01628 683193 or 01628 683202

Informing Parents

Subsequent to a referral to Children's social care, the relevant Duty Social Worker (DSW) will advise next steps. As directed by DSW, the responsibility for communication to the parents would be usually be exercised by the Head, or by a suitably trained deputy. In cases where the parent is the likely abuser, the investigating officers of RBWM/Police will inform parents.

The child's wishes

Where there is a safeguarding concern, we ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. When interviewing children, we will do so confidentially and enable the child to express their views and give feedback, and ultimately our systems and processes will operate with the best interests of the child at their heart. Our pupil voice and questionnaire reviews also provide a platform for pupils to express their wishes on a regular basis.

Support to families

- ◆ The School takes every step in its power to build up trusting and supportive relations among families, staff and volunteers in the group.
- ◆ The School continues to welcome the child and the family whilst investigations are being made in relation to abuse in the home situation.
- ◆ Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child only if appropriate under the guidance of RBWM Children's Social Care.
- ◆ With the proviso that the care and safety of the child is paramount, we do all in our power to support and work with the child's family.

The working protocols in use since the introduction of the training programme for Child Protection Officers by the Royal Borough in Spring 2007. The School's policy on Equal Opportunities and Racial equality, which underpins this work too, can be found here - <http://goo.gl/186INP>

Children's Services and Safeguarding Register

Whilst cases are active, confidential records are kept and updated regularly by the DSL concerned. These records are regularly checked by the overarching DSL, James Wilding, to ensure that a central record of concerns is maintained. If in the event of an unexplained absence of more than one day of a pupil who is on the safeguarding children register, the DSL will notify Children's Social Care.

Confidentiality

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the LADO (adults) and Children's Social Care (children/young persons). Confidentiality cannot be promised.

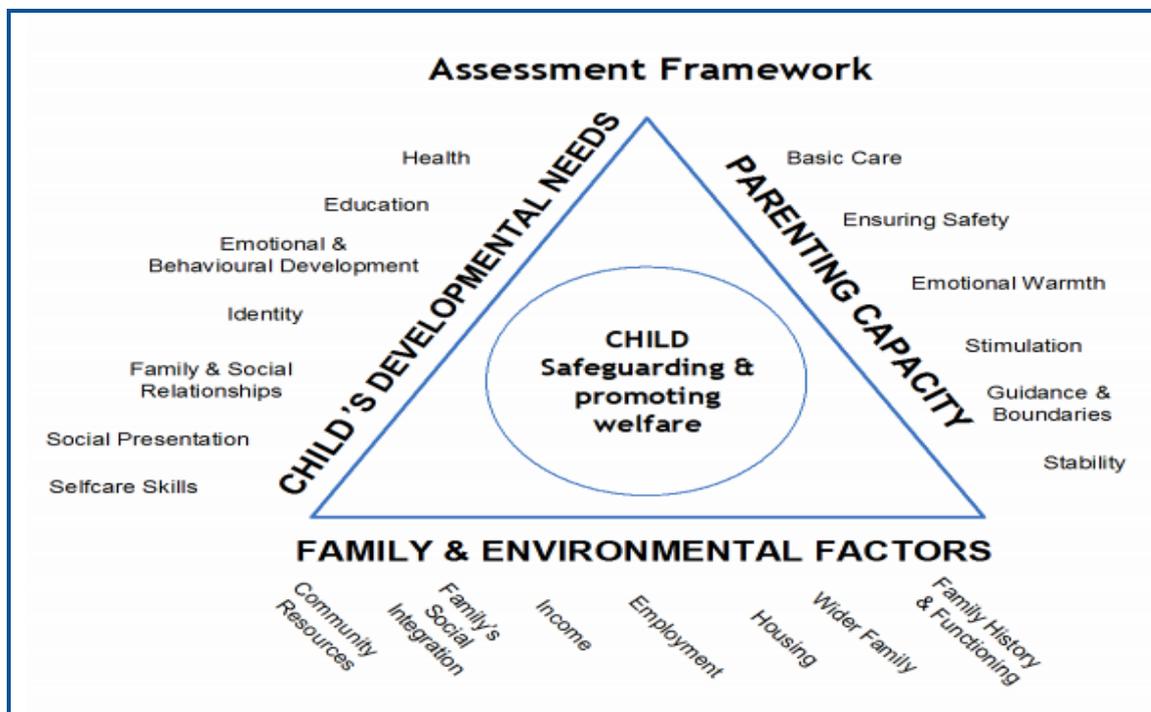
Appendix 4

Liaison with other bodies/responses to referrals

We have procedures for contacting the local authority on safeguarding and child protection issues, to ensure that it is easy, in any emergency, for the School and local statutory children's agencies, including social services, to work well together.

We work within the [RBWM Local Safeguarding partnership](#) guidelines which confirm locally agreed inter-agency procedures, now based online for our use on demand, and recognise our point of contact within RBWM to be the Local Authority Designated Officer (LADO) for allegations against staff and Children's Social care for allegations involving children. We will report through the LADO within one working day the actions we take in respect of allegations of abuse by adults, and through Children's Services and their Social Care and Assessment team's Duty Social Worker where we have concerns that a child/young person may be at risk of harm. The assessment framework model we abide by is shown below (as directed by KCSIE 2021).

Assessment framework



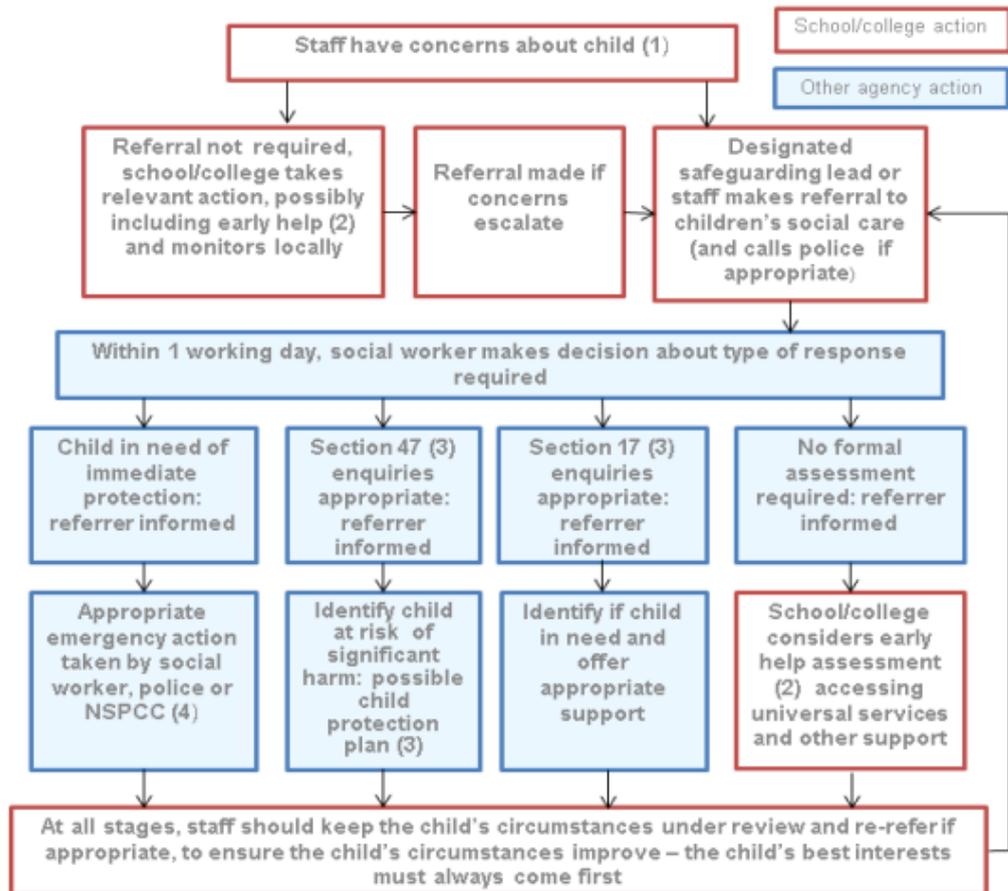
As the Assessment Framework implies, where our concerns involve safeguarding children at risk (who have suffered or are likely to suffer significant harm), those concerns will be reported to Children's Social Care immediately. Where we identify those children who are in need of additional support from one or more agencies, then we will seek inter-agency assessment using local processes, including use of the "Common Assessment Framework (CAF)" and "Team around the Child" (TAC) approaches. The Royal Borough's Multi-Agency Safeguarding Hub (MASH) is now up and running and provides a single point of access to early help and safeguarding services.

Our procedures and processes are inspected by The Independent Schools Inspectorate (ISI), and it is to the LA that we will report the actions we have taken in respect of allegations of abuse, usually on the day of first report and no later than 24 hours after the report. ISI is the body approved for the purpose of inspection under Section 162A of the Education Act 2002, and reports to the DfE on the extent to which the group within Claires Court meets statutory requirements, as we are in membership of the Independent Schools Council (ISC). ISI inspections of independent schools are required to report to the DfE the extent to which ISC schools comply with the Education (Independent School Standards) (England) Regulations 2010 and later amendments (referred to as the regulatory requirements).

If a report is to be made to the authorities, we act within the RBWM/Berkshire Local Safeguarding Board guidance, and who will advise on next steps, including consulting with staff and/or parents.

What follows below/on the next page is the KCSIE 2021 guidance on Actions where there are concerns about a child.

Actions where there are concerns about a child



1. In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of [Working together to safeguard children](#).
4. This could include applying for an Emergency Protection Order (EPO).

Below are the priorities once a [Referral of a safeguarding](#) nature about a child has been made to Children's Services.

Response to a referral

Once the referral has been accepted by local authority children's social care the lead professional role falls to a social worker.

The social worker should clarify with the referrer, when known, the nature of the concerns and how and why they have arisen.

Within **one working day** of a referral being received a local authority social worker should **make a decision** about the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm, and whether enquires must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

Action to be taken:

The child and family must be informed of the action to be taken.

Local authority children's social care should see the child as soon as possible if the decision is taken that the referral requires further assessment.

Where requested to do so by local authority children's social care, professionals from other parts of the local authority such as housing and those in health organisations have a duty to cooperate under section 27 of the Children Act 1989 by assisting the local authority in carrying out its children's social care functions. This duty also applies to other local authorities.

Appendix 5

Recruitment of staff, volunteers and other workers

For the avoidance of doubt, this applies to all divisions of the school, including EYFS, Sixth Form, Wrap-Around care and Holiday Club.

- We always aim to ensure safe and fair recruitment and selection is conducted at all times. Safeguarding and promoting the welfare of children and young people is an integral factor in our recruitment and selection and is an essential part of creating safe environments for children and young people.
- We operate safe recruitment procedures which have regard to the guidance

contained in KCSIE 2021 and in compliance with the Independent Schools Standards Regulations, which aim to ensure that no disqualified or unfit person works in the school or has access to children. Though not an exhaustive list, this will include checks via the Disclosure and Barring Service (DBS), checks against the appropriate Barred List, prohibition checks (for teaching posts), employment history, appropriate references and whether a person is disqualified* from working with children (including by association, where applicable to the role applied for).

- Regulation on Disqualification from Childcare, including 'by association', makes 3 demands of schools
 - A requirement to inform relevant people of the legislation, including that they may be disqualified 'by association' (or ensure they have been informed by others, such as their supply agency)
 - A requirement to "take steps to gather sufficient and accurate information about whether any member of staff in a relevant childcare setting is disqualified by association"
 - A requirement to keep records, including "the date disqualification checks were completed", whether on the Single Central Register (optional) or elsewhere.

Our recruitment procedures comply with these demands.

- We take particular care to ensure those involved in one-to-one teaching are aware of their safeguarding responsibilities, and a weekly check whilst the school is in session is carried out to ensure that all rooms/locations used for this purpose are visited.
- Applicants for posts within the School are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974 (and the Childcare (Disqualification) Regulations where appropriate). Candidates are informed of the need to carry out checks before posts can be confirmed and that any job offer will be withdrawn if any check is not satisfactory. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.
- Volunteers who have not been through the full vetting process do not work unsupervised.
- All school staff are provided with a copy of KCSIE (part 1) which includes Annex A on their first day of service in the school, and as part of their induction process have their understanding of its contents checked.
- All leaders and those staff that work with children have their attention drawn to Annex B, including as it does further information on sets out types and signs of abuse (physical, emotional and sexual) and neglect in line with KCSIE, Child abduction and community safety incidents, Children and the court system, Children Missing in Education, Children with family members in prison, Child Sex Exploitation, County lines and/or gangs, Cybercrime, Domestic abuse (DA), Homelessness, Honour-based violence, including FGM and Forced marriage and their mandatory reporting, and on preventing radicalisation, the Prevent duty and the Channel programme.
- All leaders and those staff that work with children will also be aware of the need

to provide additional support, to focus on the above and other elements arising, including

- Peer-on-peer/child-on-child abuse
 - Sexual violence and sexual harassment between children in schools and colleges
 - Upskirting
 - How to respond to a report of sexual violence and sexual harassment between children in schools and colleges,
 -
- A number of school staff, such as ground staff and cleaners, have little opportunity for contact with children. They are always advised not to have contact with children, and not to encourage inappropriate friendships. They are advised on safeguarding on appointment, and updated within every 3 years unless statute requires more frequently. There are circumstances (for example by way of language or lack of literacy) which mean they cannot be given a copy of KCSIE 2021 (Part1) to read. This may only happen where the risk assessment on appointment identifies them as not being 'workers with children'; for further information, please contact HR or Justin Spanswick.

External workers and visitors

- We take all appropriate steps to ensure that checks are made on any staff employed by another agency working in school, such as RBWM support staff for those with eyesight problems, and Tutors from our Apprenticeship Training organisation, Henley College. These are known as Visiting Professionals, and include Psychologists, Nurses, Police*, other public sector staff who will have been checked by their employing organisation (such as LA, Primary Care Trust, Strategic Health Authority), Sports referees and other equivalent professionals supplied by a central body.
- We have procedures for recording the details of visitors to the School. Visitors are also provided with a copy of [Safeguarding Children and Young People Guidance leaflet](#) which is available on all three sites at reception.
- We take security steps to ensure that we have control over who comes into the School so that no unauthorised person has unsupervised access to the children.
- Visiting Speakers; all visiting speakers are checked for suitability by the head/deputy/assistant head with responsibility for the invitation and any visiting speakers – whether invited by staff or by children themselves – are always appropriately supervised. They are never left alone with children.

Training of staff in safeguarding matters and KCSIE 2021

- The training of the all the DSLs is conducted by the RBWM Local Safeguarding Children Board, includes child protection, higher-level safeguarding and inter-agency working, and is updated at least once every two years
- New staff, volunteers and other workers (such as self-employed, visiting instructors) who join the School are required to participate in induction training appropriate to their role, matching those of existing staff (see page 17). This will include as a minimum:

- Identification of the School's Lead DSL and site specific DSL(s)
- The School's safeguarding policy
- The Code of Conduct for staff
- Whistleblowing procedures/policy
- E-safety
- Specific reference to online safety and training
- A copy of Part 1 of KCSIE 2021 2021, which now includes Annex A*, and Part 5.

Such induction training will usually take place within the first few weeks of employment.

- All existing staff, volunteers and other workers (such as self-employed, visiting instructors) who work with children receive updated training at regular intervals with the content being in accordance with the LSCB. We aim to ensure this happens at least once every three years with training being delivered either by an external consultant or, if not available, the DSLs. WEF September 2016, staff have been asked to take an annual safeguarding check, including current updates, using the school's SMARTLOG system.
- Those staff, volunteers and other workers (such as contractors) who do not work directly with children receive training as deemed appropriate to their role by the Lead DSL. Such workers are always advised not to have contact with children and not to encourage inappropriate friendships. This training and supporting guidance will also be updated at regular intervals. We aim to ensure this happens at least once every three years and is usually delivered by the DSLs.
- All staff, volunteers or other workers who have contact with children are required to have read KCSIE Part 1 and Part 5, along with Annex A and B (although Annex A now forms a section of Part 1).

*If there are circumstances which mean we cannot give him/her a copy of KCSIE 2021 (Part1) to read (for example by way of language or lack of literacy) we ensure that they understand the key information. This may only happen where the risk assessment on appointment identifies them as not being 'workers with children'; for further information, please contact the Lead DSL.

- A record of training in safeguarding/child protection is kept on a central record by the Human Resources Department.

Staff obligations

- All staff in our school are required to notify the Principals immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf).

The 'by association' requirement also applies if a member of staff lives in the

same household as or someone is employed in his/her household who has been disqualified from working with children under the Childcare Act 2006.

- The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.
- The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Executive Headteacher immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the Academic Principal immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.
- The lead member of staff for ICT on each site/section liaises frequently and meets at least once a term with the DSL to review actions with regards to technology and online safety, and recommendations from such meetings notified to both the Principals and to our safeguarding visitor, Sue Manser
- Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Academic Principal for more details.

Staff, volunteers or workers leaving

- The School will promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met; that is, they have caused harm or posed a risk of harm to a child.
- In addition, consideration will also be given to making a referral will be made to the National College for Teaching and Leadership where a teacher has been dismissed for misconduct (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate. The reasons for such an order include "unacceptable professional conduct", conduct that might bring the profession into disrepute, or a "conviction", at any time, for a relevant offence. The TRA (teacher regulation agency) will be informed.

Appendix 6 - [Whistleblowing Policy](#)

Whistleblowing Policy

The School has adopted this policy and the accompanying procedure on whistleblowing to encourage and enable members of staff to raise serious concerns internally and in a confidential fashion about poor or unsafe practice, potential failures in the school's management (its safeguarding regime, for example) fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and

failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation.

Though the term 'staff' is used, this policy applies to all those who are employed by the School, employed through an agency, contractors or as a volunteer.

1. Purpose of the policy

The School's policy on whistleblowing is intended to demonstrate that the School :

- Encourages all staff, whatever their status, to raise concerns they have about the conduct of the school's business;
- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

These procedures are in addition to the School's complaints procedures and other statutory reporting procedures.

2. Procedure

This procedure is intended to be used primarily for concerns where the interests of the pupils or of the School itself are at risk. It is separate from the School's adopted procedures regarding grievances; staff should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding poor or unsafe practice, potential failures in the school's management or suspected malpractice within the School. Please note that rather than wait for proof, we would encourage staff to raise matters whilst they are still a concern.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of conduct, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

Staff who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised verbally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

3. The Investigation

A member of staff will be at liberty to express their concern to the Headteacher or Assistant/Deputy Headteacher of any site.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution. If applicable to the circumstances, the School will take steps to provide mediation and dispute resolution for all parties involved.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Principals.

4. External Procedures

Where all internal procedures have been exhausted, a member of staff shall have a right of access to a complaints panel made up of two people independent of the school and the complaint. This would usually be co-ordinated by the Principals' PA.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where he or she reasonably believes :-

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it.

5. Malicious Accusations

Provided that you are acting in good faith, it does not matter if you are mistaken or your concerns are unfounded. However, false, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure and may, depending on the seriousness be regarded as gross misconduct.

6. Protection from Reprisal or Victimisation

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the Whistleblowing procedures. The School will not tolerate harassment or victimisation of someone who has raised a genuine concern and any such behaviour will be dealt with as a disciplinary matter.

Appendix 7 - online safety

We consider that the increasing availability to children of electronic devices that give unrestricted access to the internet, has direct consequences for both safeguarding and anti-bullying arrangements.

We actively manage our hardware, software and connectivity as follows:

The vigilance of teachers and parents have a part to play in the safeguarding and protection of pupils. We employ Paul Hay, an external advisor to assist us in our work, and leading/managing sessions for teachers, pupils and parents throughout the year to raise awareness and highlight best practice for all to stay safe whilst

online and working with technology. We agree that pupils will often have access to technologies that have both positive and negative potential. Our various policies for Data protection, privacy notices for children, BYOD and [ICT/eSafety](#) use highlight how we use and deploy our technologies and emphasise what is appropriate and acceptable. Links to these policies through the main school website:

<http://www.clairescourt.com/page/?title=Policies+%26amp%3B+Guidance&pid=283>

(a) Defined roles and responsibilities for online safety as part of the school's wider safeguarding strategy - the DSL takes overarching lead, with ICT/DSL leads on each school site/section has specific liaison lead. Incidents are written up on school Incident forms to ensure tracking of such technology/online events are captured.

(b) We provide clear guidance on the use of technology in the classroom and beyond for all users, including staff, students/pupils and visitors that references permissions/restrictions and agreed sanctions; our policies and procedures make specific reference to these, in line with [Teaching Online Safety in schools 2019](#) and the latest updates from July 2021 [here](#).

(c) Technical provision/infrastructure and the safeguards in place to filter and monitor inappropriate content and alert the school to safeguarding issues: for reasons of security we do not provide this detail in this policy. Outlines include: Google Apps for Edu provides appropriate encryption and data protection for all that use its services in Education. Google's service provision complies with the UK ICO - link here, and all appropriate safeguards available to schools (such as Google Search Safe filter) are enabled.

Our Chromebooks' file, virus and filter management are via Google services. In-house network filtering is provided by Sophos, which covers file, email, web-proxy and internet content.

Inappropriate use logging by Sophos produces summaries for review, which identify machine, and then gives rise to sanctions for the user(s) concerned as appropriate. WEF September 2016, we have an additional filter in place provided by SMOOTHWALL, which identifies the user account responsible for any suspected infringement, with regular reporting of breaches to school leadership to ensure appropriate monitoring takes place.

WiFi connectivity (4 SSIDs) cover pupil, staff, chromebooks and visitor; this service provided by Cisco Meraki, which provides a separate level of reporting for inappropriate use and network activity. All internal networks are provided with external security by Cisco firewalls and routers. The School's data servers are all held internally. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and we continually consider how this is managed on our premises - see acceptable use .

Our service provision for data pipeline, filtering, virus and spam filters are managed by the school's ITHelp, who also service our hardware sufficiently frequently and, at

least once a year, service staff laptops and chromebooks to ensure safe and appropriate use is made of the equipment.

Staff laptops and tablets, including their BYOD are subject to scrutiny to ensure compliance with policies and procedures.

(d) Detail on how the school builds resilience in its students to protect themselves and their peers through education and information;

In addition to the extensive scenario training as part of PSHEE, we run specific online safety sessions with our external consultant Paul Hay.

(e) Detail on staff safeguarding professional development that includes online safety;

All members of staff receive initial training and regular in-service in online safety as part of their safeguarding training, log kept by HR.

(f) Reporting mechanisms available for all users to report issues and concerns to the school and how they are managed and/or escalated;

See Safeguarding training and use of Concern sheets to 'statement' issues and concerns.

(g) How the school informs, communicates with and educates parents/carers in online safety;

See Handbook for new pupils, Curriculum statements, eWeek bulletins and notifications of Paul Hay lectures for Parents highlighting the need for Digital Safety at home

(h) The management of personal data in line with statutory requirements.

Our data protection policy can be found here: <https://goo.gl/Ef6fpA>