



## **Policy and Procedures for Safeguarding and Child Protection**

Safeguarding and Child Protection procedures and policies will follow the guidance of the **'Working Together to safeguard Children 2013'**, the **'Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges' September 2016**, **London Child Protection Procedures 4<sup>th</sup> Edition 2011 and Section A 5<sup>th</sup> Edition 2013**. This Policy is required under The Independent School Regulations 2010 (reviewed 2012) Part 3 7(a)(b).

**Designated Safeguarding Lead: Herve GLASEL**

### **Policy Statement**

The staff at the School fully recognise their professional responsibilities for protection from harm to all children in our care. Our policy applies to all staff, volunteers and everyone working in the School as:

- ◆ Children have a right to be safe
- ◆ Adults have a responsibility to safeguard and protect children
- ◆ Abuse is damaging, and can blight the remainder of the child's life
- ◆ Abused children sometimes become abusing adults
- ◆ Child abuse exists in a world of secrecy and silence - the cycle of abuse has to be broken
- ◆ An abuser may well abuse many other children who also have a right to protection
- ◆ Children should be able to grow up to be well-adjusted adults
- ◆ To prevent death and serious injuries.

### **School Aims**

- ◆ Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- ◆ Ensure children know that there are adults in the school whom they can approach if they are worried.
- ◆ Raising awareness of child protection issues and equipping children with the skills needed to keep them safe for example through the PSHE curriculum.
- ◆ Ensuring we practice safe recruitment, in accordance with the Disclosure and Barring Services check when checking the suitability of staff, teaching, administrative, and volunteers who work with children.
- ◆ Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- ◆ Supporting pupils who have been abused in accordance with the agreed child protection plan.

- ◆ In accordance with the guidance KCSIE 2016 all staff including DSL's will be updated annually on any additional guidance issued on safeguarding to provide them with relevant skills and knowledge to safeguard children effectively.
- ◆ The School should ensure that **all staff** in their school **read and sign to say that they have read** at least Part one of this guidance.
- ◆ The School should ensure that mechanisms are in place to assist staff to carry out their duties.
- ◆ **All** staff members should be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction. This should include:
  - the child protection policy;
  - the staff behaviour policy (sometimes called a code of conduct); and
  - the role of the Designated Safeguarding Lead. Copies of policies and a copy of Part one of this document (Keeping children safe in education) should be provided to staff at induction.
- ◆ **All** staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

## Procedures

We will follow the procedures set out by the Local Authority and Local Safeguarding Children's Board and take account of guidance issued by the Department for Education and Skills to establish:

- **Duty of Care**
- **Definitions and symptoms of abuse**
- **Monitoring and Record keeping**
- **Disclosure and actions following a disclosure (child)**
- **Whistle-blowing**
- **Disclosure and actions following a disclosure (adult)**
- **Safer Recruitment**

## Duty of Care

- ◆ Ensure that all staff take responsibility for overseeing the Child Protection Policies and Procedures and that they are reviewed annually.
- ◆ Ensure we have a Designated Safeguarding Lead for child protection who has received appropriate training and support for this role.
- ◆ Ensure every member of staff (including temporary and supply staff and volunteers) knows the name of the Designated Safeguarding Lead responsible for child protection and his role.

- ◆ Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated Safeguarding Lead responsible for child protection.
- ◆ Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- ◆ Notify social services if there is an unexplained absence of more than two days of a pupil who is on the child protection register.
- ◆ Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- ◆ Keep written records of concerns about children, even where there is no need to refer the matter immediately. (See appendix 3 for pastoral concern sheet)
- ◆ Ensure all records are kept securely; separate from the main pupil file, and in locked locations.
- ◆ Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- ◆ Ensure safe recruitment practices are always followed.
- ◆ Training is updated regularly for the Head, DSLs and all staff every year.
- ◆ **All** staff should be aware safeguarding issues can manifest themselves via peer on peer abuse.

### **Duty of the School**

To appoint a **Designated Safeguarding Lead** to take responsibility for:

- ◆ Implementing the child protection policy within the School
- ◆ Supporting other staff in their understanding of child protection issues and ability to recognise the signs and symptoms of abuse
- ◆ Managing the establishment's response to a disclosure of abuse

### **To provide induction and training:**

Every new member of staff, including part-timers, temporary, visiting and contract staff working in school, receives basic training on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the **Designated Safeguarding Lead** or the Head as well as working with different agencies. Training in child protection and safeguarding is an important part of the induction process. More detail is set out in our policy on Induction of New Staff and Volunteers in Child Protection and Safeguarding. All training is updated at 3 yearly intervals. All staff are given guidelines on what to do if a child approaches them to discuss allegations of abuse (appendix 1) and the Code of Behaviour - for All Staff and Volunteers (appendix 2). All are also made aware of the pastoral care concern sheet (appendix 3) and **Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges** and will be required to read and confirm by signing that they have read and understand how to implement part 1.

### **To support children:**

We create a culture of value and respect for each individual, having positive regard for children's heritage arising from their colour, ethnicity, and language, cultural and social background.

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

- ◆ The content of the curriculum.
- ◆ The school ethos, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- ◆ The school behaviour and anti-bullying policy, which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- ◆ Liaison with other agencies that support the pupil such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- ◆ Ensuring that, where a pupil on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed.
- ◆ It is essential that children are safeguarded from potentially harmful and inappropriate online material. As such appropriate filters and appropriate monitoring systems are in place.

### **Duty of Staff**

It will be made clear to staff applying for posts within the School that the position is exempt from provisions of the Rehabilitation of Offenders Act 1974.

Staff will be made aware of the 'Working Together to safeguard Children 2013', the 'Statutory Guidance for Schools and Colleges' April 2014 and Keeping Children Safe in Education 2016.

At School, all staff (teaching and non-teaching) seeks to adopt an open and accepting attitude towards pupils as part of their responsibility for pastoral care. The staff hopes that parents and pupils feel free to talk about any concerns and see school as a safe place. Pupils' worries and fears will be taken seriously if they seek help from a member of staff. However, staff cannot guarantee confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare.

Staff who observe injuries which appear to be non-accidental, or who are told anything significant by a pupil, must report their concerns to **Herve Glasel** who is the Designated Safeguarding Lead. He has attended a course and received Level 3 training on Child Protection which included training in child protection matters. Training is updated regularly for the Head and Designated Safeguarding Lead every other year.

All members of staff are required to sign a declaration whereby they confirm they understand the policy and procedures (on recruitment and following each review).

Members of staff are made aware that they may report any concerns directly to the local LADO and the social services: **The Brent Family Front Door, Tel: 020 8937 4300**, Email [family.frontdoor@brent.gcsx.gov.uk](mailto:family.frontdoor@brent.gcsx.gov.uk)  
brent.lado@brent.gov.uk

### **Responsibilities of the Designated Safeguarding Lead**

Broad areas of responsibility proposed for the Designated Safeguarding Lead for child protection in each establishment:

## **Referrals**

- ◆ Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- ◆ Act as a source of support, advice and expertise within the educational establishment when deciding whether to make a referral by liaising with relevant agencies.
- ◆ Liaise with Head (where role is not carried out by the Head) to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role.
- ◆ Liaise with the Local Child Protection Board to ensure awareness of local multi-agency procedures, local referral procedures and training opportunities, and maintain a list of local multi-agency contacts.

## **Raising Awareness**

- ◆ Ensure the School's Safeguarding Policy is updated and reviewed annually
- ◆ Ensure parents see copies of the Safeguarding Policy, which alerts them to the fact that referrals may be made, and the role of the School in this to avoid conflict later.
- ◆ Where children leave the School ensure their child protection.

## **Training**

- ◆ To recognise how to identify signs of abuse and when it is appropriate to make a referral.
- ◆ Having a working knowledge of how the Local Safeguarding Children Board operates, the conduct of a child protection case 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 Safeguarding Policy especially new or part time staff who may work with different educational establishments.
- ◆ Ensure all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise.
- ◆ Be able to keep detailed accurate secure written records of referrals/concerns.

## **Duty of Parents**

Parents are expected to help their children to behave in non-violent and non-abusive ways towards both staff and other pupils. Parents will be informed if it was necessary to use minimal force to protect a pupil from injury or to prevent a pupil from harming others.

Parents should always inform the school of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the school of any changes in home circumstances, such as the death of a member of the family, separation or divorce, that might lead to otherwise unexplained changes in behaviour or characteristics.

## **Duty of the School to Parents**

Parents can feel confident that procedures are in place to ensure that all staff appointed has undergone procedures to ensure that they are suitable to work with children. All voluntary helpers undergo similar procedures including a police check.

Every staff member has an enhanced DBS check (<https://www.gov.uk/government/news/disclosure-and-barring-service-update-service-now-available>). Guidelines on the procedures if an allegation is made about a member of staff are outlined in the Child Protection - Professional Abuse Policy. These will

be made available to a parent if they make an allegation against a member of staff. Parents will be informed of the procedure if they make a formal complaint about a staff member or volunteer in the setting.

### **Definitions and Symptoms 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.**

The Children Act 1989 introduced the concept of "Significant Harm" as the threshold that justifies compulsory intervention in family life in the interests of children.

There are no absolute criteria to rely on when judging what constitutes significant harm. Overall, it can be described as the detrimental outcome of various forms of child maltreatment to the child's well being.

**Harm** means ill treatment or the impairment of health or development.

**Development** means physical, intellectual, emotional, social or behavioural development.

**Ill-treatment** includes sexual abuse and forms of ill treatment, which are not physical.

**Health** includes physical or mental health.

Where the question of whether harm suffered by a child is significant turns on the child's health and development, the child's health or development shall be compared with that which could reasonably be expected of a similar child.

There are four main categories of abuse – physical injury, neglect, sexual abuse and emotional abuse. The list of symptoms given is not exhaustive or comprehensive but consists of frequently observed symptoms. It is important to remember that most abuse involves more than one main type, for example, sexual and emotional abuse may be recognised together. These symptoms, for example cuts and grazes, may also be accidental and not a sign of abuse. These different types of abuse require different approaches. A child suffering from physical abuse may be in immediate and serious danger. Action should, therefore, be taken immediately. With other forms of abuse there is a need to ensure that adequate information is gathered. There is also a need to make sure that grounds for suspicion have been adequately investigated and recorded. The need to collate information must be balanced against the need for urgent action. If there are reasonable grounds for suspicion then a decision to monitor the situation should only be taken after consultation. A situation that should cause particular concern is that of a child who fails to thrive without any obvious reason. In such a situation a medical investigation will be required to consider the causes.

### **Physical Injury**

Symptoms:

- ◆ **bruises and abrasions** - especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of injury or when it appears frequently.
- ◆ **slap marks** — these may be visible on cheeks or buttocks.
- ◆ **twin bruises on either side of the mouth or cheeks** - can be caused by pinching or grabbing, sometimes to make a child eat or to stop a child from speaking.

- ◆ **bruising on both sides of the ear** — this is often caused by grabbing a child that is attempting to run away. It is very painful to be held by the ear, as well as humiliating and this is a common injury.
- ◆ **grip marks on arms or trunk** - gripping bruises on arm or trunk can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child; i.e. a brain haemorrhage as the brain hits the inside of the skull. X-rays and other tests are required to fully diagnose the effects of shaking. Grip marks can also be indicative of sexual abuse.
- ◆ **black eyes** – are mostly commonly caused by an object such as a fist coming into contact with the eye socket. NB. A heavy bang on the nose, however, can cause bruising to spread around the eye but a doctor will be able to tell if this has occurred.
- ◆ damage to the mouth – e.g. bruised/cut lips or torn skin where the upper lip joins the mouth.
- ◆ **bite marks**
- ◆ **fractures**
- ◆ **poisoning or other misuse of drugs**-e.g overuse of sedatives
- ◆ **burns and/or scalds** – a round, red burn on tender, non-protruding parts like the mouth, inside arms and on the genitals will almost certainly have been deliberately inflicted. Any burns that appear to be cigarette burns should be cause for concern. Some types of scalds known as ‘dipping scalds’ are always cause for concern. An experienced person will notice skin splashes caused when a child accidentally knocks over a hot cup of tea. In contrast a child who has been deliberately ‘dipped’ in a hot bath will not have splash marks.

## Neglect

### Symptoms:

- ◆ **Dirty**
- ◆ **Lack of appropriate clothing**
- ◆ **Smells of urine**
- ◆ **Unkempt hair**
- ◆ **No parental interest** (a distinction needs to be made between situations where children are inadequately clad, dirty or smelly because they come from homes where neatness and cleanliness are unimportant and those where the lack of care is preventing the child’ from thriving.)
- ◆ **Underweight** — a child may be frequently hungry or pre-occupied with food or in the habit of stealing food or with the intention of procuring food. There is particular cause for concern where a persistently underweight child gains weight when away from home, for example, when in hospital or on a school trip. Some children also lose weight or fail to gain weight during school holidays when school lunches are not available and this is a cause for concern.
- ◆ **Body sores**
- ◆ **Not wanting to communicate**
- ◆ **Behaviour problems**
- ◆ **Attention seeking**
- ◆ **Lack of respect**
- ◆ **Often in trouble – police**
- ◆ **Bullying**
- ◆ **Use of bad language**
- ◆ **Always out at all hours**
- ◆ **Stealing**
- ◆ **Lack of confidence – low self-esteem**
- ◆ **Jealousy**

## Sexual Abuse

### Symptoms:

- ◆ **a detailed sexual knowledge inappropriate to the age of the child.**
- ◆ **behaviour that is excessively affectionate or sexual towards other children or adults.**
- ◆ **attempts to inform by making a disclosure about the sexual abuse** often begin by the initial sharing of limited information with an adult. It is also very characteristic of such children that they have an excessive preoccupation with secrecy and try to bind the adults to secrecy or confidentiality.
- ◆ **a fear of being alone** — this applies to friends/family/neighbours/baby-sitters, etc
- ◆ **a fear of medical examinations.**
- ◆ **a sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa.**
- ◆ **excessive masturbation** is especially worrying when it takes place in public.
- ◆ **promiscuity**
- ◆ **sexual approaches or assaults** - on other children or adults.
- ◆ **urinary tract infections (UTI), sexually transmitted disease (STD)** are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified.
- ◆ **bruising** to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place.
- ◆ **discomfort or pain** particularly in the genital or anal areas.
- ◆ **drawing of pornographic or sexually explicit images.**
- ◆ **withdrawn**
- ◆ **rejecting physical contact or demanding attention**

## Emotional Abuse

### Symptoms:

- ◆ **Crying**
- ◆ **Rocking**
- ◆ **Withdrawn**
- ◆ **Not wanting to socialise**
- ◆ **Cringing**
- ◆ **Picking up points through conversation with children**
- ◆ **Bad behaviour**
- ◆ **Aggression**
- ◆ **Behaviour changes**
- ◆ **Bribery by parent**
- ◆ **Self-infliction**
- ◆ **Lack of confidence**
- ◆ **Attention seeking**
- ◆ **Isolation from peers – unable to communicate**
- ◆ **Clingy**
- ◆ **Afraid of authoritative figures**
- ◆ **Treating others as they have been treated**

## **Child Sexual Exploitation and Female Genital Mutilation**

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

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. For information on warning signs that FGM may be about to take place, or may have already taken place, please refer to the Multi-Agency Practice Guidelines which can be found in the Policy drive on the school intranet in the Safeguarding file which can be found in Pupils Welfare, Health and Safety folder. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

## **Mandatory Reporting Duty**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers<sup>11</sup>, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The Mandatory reporting duty commenced in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

## **Honour Based Violence**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant

communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

From 1 July 2015 specified authorities, including all schools (and since 18 September 2015 all colleges) as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

### **Prevent officer: Herve GLASEL**

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

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

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

The proprietor should ensure that as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation should be seen as part of schools’ wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism<sup>12</sup>. 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 has become a major factor in the radicalisation of young people. As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of

radicalisation and act proportionately which may include making a referral to the Channel programme.

### **Specific safeguarding issues**

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

- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- preventing radicalisation
- sexting
- teenage relationship abuse
- trafficking

### **Monitoring and Record Keeping**

It is essential that accurate records be kept where there are concerns about the welfare of a child. Pastoral care concern sheets are to be filled in (appendix 3) and given to the DSL. These records are kept in secure, confidential files, which are separate from the child's school records by the DSL. It is important to recognise that regulations published in 1989 do not authorise or require the disclosure to parents of any written information relating to Child Protection. However, it is preferable, where

circumstances allow, that parents be informed of and agree to any referral being made (unless it relates to sexual abuse).

Staff must keep the [Designated Safeguarding Lead](#) informed of:

- ◆ poor attendance & punctuality
- ◆ concerns about appearance and dress
- ◆ changed or unusual behaviour
- ◆ concerns about health and emotional well being
- ◆ deterioration in educational progress
- ◆ discussions with parents about concerns relating to their child
- ◆ concerns about home conditions or situations
- ◆ concerns about pupil on pupil abuse (including serious bullying)

When there is suspicion of significant harm to a child and a referral is made as much information as possible should be given about the nature of the suspicions, the child and the family. Use of previous records (if available) may prove to be particularly useful in this respect.

All communications, whether verbal or written, are strictly confidential and only when the Head deems it appropriate, will other members of staff be informed.

This procedure for child protection will be reviewed annually by the proprietor.

Support must be given to members of staff involved in child protection referral and, in the interest and protection of all staff, the procedure for child protection shall be under continual review in order to eliminate any bad practice.

The School recognises that staff involved in a child protection issue will find it distressing and will offer support and guidance accordingly.

For contact with Child protection specialists available for consultation in the London Borough of Brent, the Head or the [Designated Safeguarding Lead](#) will contact the LADO ([brent.lado@brent.gov.uk](mailto:brent.lado@brent.gov.uk)).

You must also contact the Local Authority [Designated Safeguarding Lead](#) (LADO) for allegations against staff. Any allegations made against the head teacher or proprietor will be referred directly to the local LADO and the social services: **The Brent Family Front Door, Tel: 020 8937 4300**, Email [family.frontdoor@brent.gcsx.gov.uk](mailto:family.frontdoor@brent.gcsx.gov.uk)  
[brent.lado@brent.gov.uk](mailto:brent.lado@brent.gov.uk)

### **Disclosure and Action following a Disclosure (child)**

Where a child discloses concerns or makes an allegation no judgement should be made or enquiries initiated by the staff member merely listening and seeking clarification is required before consulting with the [Designated Safeguarding Lead](#). Confidentiality should not be promised to anyone. A record should be kept of the conversation. Where there is a suspicion that a child is suffering or likely to suffer significant harm, the concern should be referred without delay to the Head/ [Designated Safeguarding Lead](#) who will investigate.

Where the child requires urgent medical treatment an ambulance should be called to take him/her to hospital and concerns raised with the [Designated Safeguarding Lead](#).

## **Action for the Designated Safeguarding Lead**

Following a disclosure, the Designated Safeguarding Lead will then speak to the parent/s in the case of evidence of physical abuse to seek an explanation, but only if there is no risk to the child of further harm resulting out of this action.

In the event of disclosure of suspected sexual abuse, an immediate referral to the local Social Services authority will be made by the Designated Safeguarding Lead.

In all other cases of suspected abuse the Designated Safeguarding Lead will enter into preliminary discussion with the parents to ascertain any possible explanation. These discussions are exploratory, and the Designated Safeguarding Lead should be careful not to prejudice the outcome of any potential multi-agency investigation.

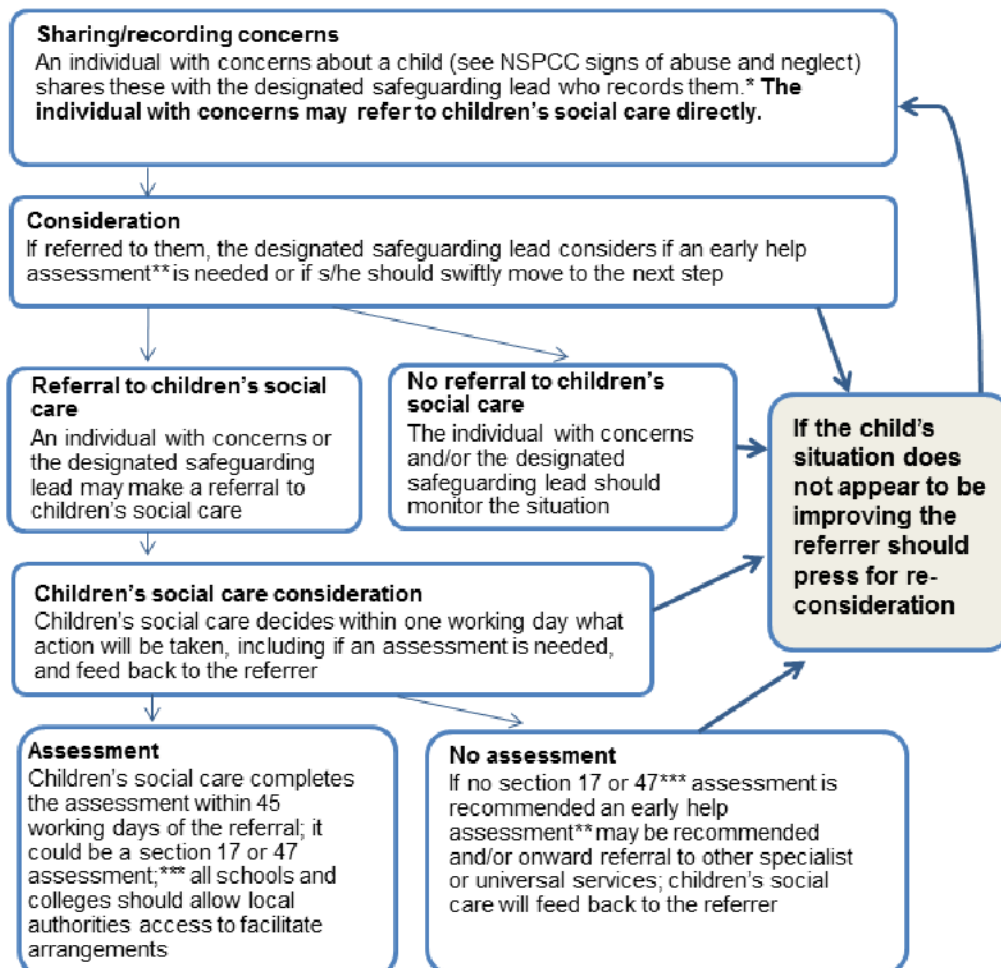
Where, following preliminary enquiries by the Designated Safeguarding Lead, a prima facie case of abuse is apparent, or where there are contraindications to preliminary enquiries, a referral should be made under local multi-agency arrangements. The referral should be made by email (or as required by Brent safeguarding children Board) either at the time of the initial disclosure or within 48 hours of the incident to the local Social Services department office.

The person making the referral should provide the following information if available:

- ◆ Details about their own location, status and relationship with the child.
- ◆ Whether the child is currently safe and any deadlines approaching (e.g. child about to be collected by parent; alleged abuser returning imminently to household)
- ◆ When the child was last seen and the current location of the child.
- ◆ The child's name, date of birth, sex, disability, or any known health care issues, ethnic origin, religion, language spoken.
- ◆ Any other names the child or family members have been known by.
- ◆ The address of the child and parents, and any known previous addresses.
- ◆ The family and household structure and details of any other significant people in the child's life.
- ◆ Details of the concern (if an incident, the time, place, persons involved)
- ◆ Information regarding parental knowledge or, and if appropriate, agreement to the referral.

## Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. **Anybody can make a referral.**



\* In cases which also involve an allegation of abuse against a staff member, see part four of this guidance which explains action the school or college should take in respect of the staff member

\*\* Where a child and family would benefit from coordinated support from more than one agency (eg, education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

\*\*\* Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.

## Whistle – blowing

All staff will be made aware of the importance of whistle – blowing and feel confident to voice concerns about the attitude or actions of colleagues.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at- Advice on whistleblowing

- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

From September 2016 A section 128 direction prohibits or restricts a person from taking part in the management of an independent school.

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the Brent LADO. See also Local Safeguarding Children Boards Procedure<http://www.londoncp.co.uk/consultation/lscb.html>

<http://www.londoncp.co.uk/consultation/lscb.html>

Disclosure and actions following a disclosure (adult)

### **London Child Protection Procedures - Child Protection – Professional Abuse Policy**

Guidelines for the management of allegations of abuse by staff and other Professionals.

These guidelines are taken from the **London Child Protection Procedures 5<sup>th</sup> Edition 2013 section A.**

For further details refer to the LCPP

[http://www.londoncp.co.uk/consultation/alleg\\_staff.html](http://www.londoncp.co.uk/consultation/alleg_staff.html)[http://www.londoncp.co.uk/consultation/alleg\\_staff.html](http://www.londoncp.co.uk/consultation/alleg_staff.html)

[http://www.londoncp.co.uk/consultation/alleg\\_staff.html](http://www.londoncp.co.uk/consultation/alleg_staff.html)

### **General considerations relating to allegations and concerns of abuse**

The employer will inform the Brent designated (LADO) immediately if an allegation is made within one working day. They will then advise the employer whether or not informing the parents of the child/ren involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, the employer will inform the parents. In some circumstances, however, the parents may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The employer will seek advice from the LADO, the police and/or LA children's social care about how much information should be disclosed to the accused person. Subject to restrictions on the information that can be shared, the employer will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body)

The accused member of staff should:

- ◆ Be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
- ◆ Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- ◆ If suspended, be kept up to date about events in the workplace.

## **Confidentiality**

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

The police should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances (e.g. an appeal to trace a suspect). In such cases, the reasons should be documented and partner agencies consulted beforehand.

Section 13 of the Education Act 2011 provides restrictions on the publication of any information that would identify a teacher who is the subject of an allegation of misconduct that would constitute a criminal offence, where the alleged victim of the offence is a registered pupil at the school.

Such restrictions remain in place unless or until the teacher is charged with a criminal offence, though they may be dispensed with on the application to the Magistrates' Court by any person, if the court is satisfied that it is in the interests of justice to do so, having regard to the welfare of –

- a. The person who is the subject of the allegation and
- b. the victim of the offence to which the allegation relates

There is a right of appeal to the Crown Court

This restriction will apply to allegations made against any teacher who works at a school, including supply and peripatetic teachers. 'School' includes academies, Free Schools, independent schools and all types of maintained schools.

Publishing any information in breach of these restrictions is an offence. Publication includes any communication, in whatever form, which is addressed to the public at large or any section of the public.

It is a defence to show that the person publishing was not aware of the allegation having been made as set out in section 141H 'Defences' of the Act

## **Support**

The organisation, together with LA children's social care and/or police, where they are involved, will consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies will take place in order to ensure that the child's needs are addressed.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

## **Suspension**

Suspension is a neutral act and it will not be automatic. It will be considered in any case where:

- ◆ There is cause to suspect a child is at risk of significant harm; or
- ◆ The allegation warrants investigation by the police; or
- ◆ The allegation is so serious that it might be grounds for dismissal

If a strategy meeting/discussion is to be held or if the LA children's social care or the police are to make

enquiries, the LADO will canvas their views on suspension and inform the employer. Only the employer, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or police. Suspension does not imply a finding of guilt but is intended to enable a dispassionate investigation of the facts, unimpeded by interpersonal tensions. Any employee who is suspended will be informed immediately for the reason for suspension.

### **Referral to the Disclosure and Barring Service (DBS)**

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide their services, the LADO will discuss with the employer whether a referral will be made to Disclosure and Barring Service and/or a regulatory body (e.g. the General Teaching Council, the DfE employer's access or General Medical Council).

The referral will be made using the DBS Referral Form: <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>, after consulting the DBS Referral Guidance or contacting the DBS barring helpline Telephone: 01325 953795)

Consideration will then be given by the DBS as to whether the individual will be barred from, or have conditions imposed in respect of, working with children.

Employers have a legal duty to refer concerns to the DBS. A referral MUST be made when an employee or volunteer is removed from working with children or vulnerable adults (even temporarily) because the employer thinks the person has engaged in relevant conduct\*.

If a referral is to be made, it will be submitted within one month of the allegation being substantiated.

\*Relevant conduct is when a person has harmed or may have harmed a child or vulnerable adult. Inciting or encouraging another person to harm a child or vulnerable adult is also relevant conduct.

### **Safer Recruitment**

The School operates Safe Recruitment procedures and all prospective staff are subject to criminal records checks, checks by the Disclosure and Barring Service (DBS) [ and the DfE employer's access, Teacher Services - contact [employer.access@education.gsi.gov.uk](mailto:employer.access@education.gsi.gov.uk).] and compliance with the Independent School Standards Regulations. All Staff are made aware of the Childcare Act (2006). We observe the requirement to report to the Disclosure and Barring Service (DBS), within one month of leaving the school any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children.

All Senior Management attend Safer Recruitment Training as required by law.

### **All new appointments to regulated activity**

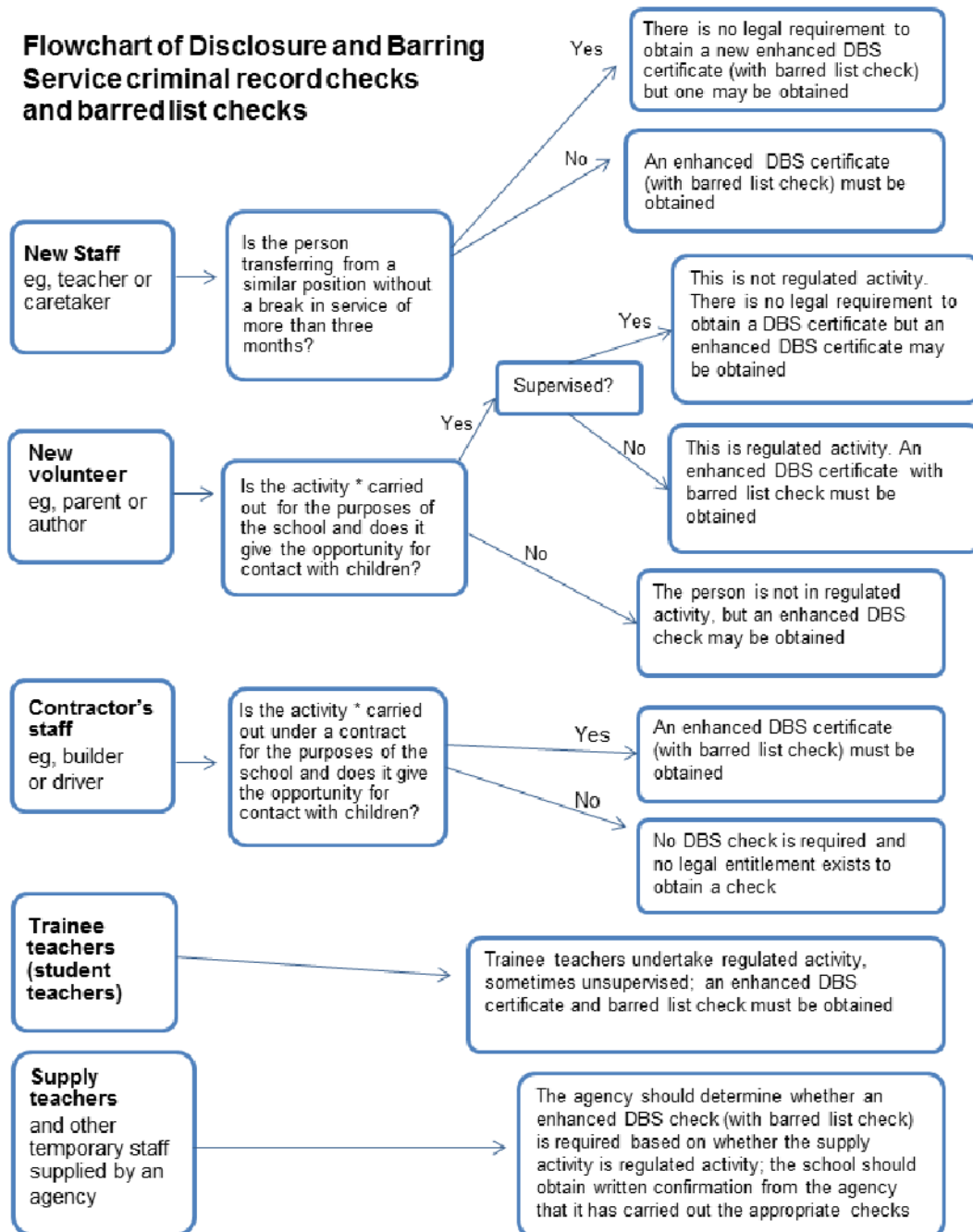
An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of pre-employment checks. When appointing new staff, the School must:

- ◆ verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available
- ◆ obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity
- ◆ obtain a separate barred list check ( with BDS barred list service) if an individual will start work in regulated activity before the DBS certificate is available

- ◆ check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service (DfE employer secure online access)
- ◆ verify the candidate's mental and physical fitness to carry out their work responsibilities( this cannot be done before the position is offered and the job offer will need to be conditional on the medical check) .
- ◆ verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website
- ◆ if the person has lived or worked outside the UK, make any further checks ( for example French casier judiciaire ) the School considers appropriate to satisfy itself that the person can work with children .
- ◆ verify professional qualifications, as appropriate

**There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child ( see referral to the DBS barred list above)**

## Flowchart of Disclosure and Barring Service criminal record checks and barred list checks



\* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

## Appendix 1

### What to do if a child approaches you to discuss allegations of abuse

Any member of staff who has contact with children at School may be approached by a child who needs to talk about something in confidence.

Here are some basic principles to follow if this happens to you.

What to do	What not to do
<p>Stay calm</p> <p>Listen, hear and believe</p> <p>Give time to the person to say what they want</p> <p>Reassure and explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed</p> <p>Act immediately in accordance with the procedure in the Child Protection Policy</p> <p>Record accurately in writing as soon as possible what was said and without personal comment</p> <p>Report to the Child Protection Officer only</p>	<p>Do not panic. Don't over react. It is extremely unlikely that the child is in immediate danger</p> <p>Do not probe for more information. Questioning the child may affect how the disclosure is received later on</p> <p>Do not make assumptions. Do not paraphrase or offer alternative explanations or suggestions</p> <p>Do not promise confidentiality to keep secrets or that everything will be OK (it might not)</p> <p>Do not try to deal with it yourself</p> <p>Do not make negative comments about the alleged abuser. Do not make personal observations. Do not make a child repeat a story unnecessarily</p> <p>Do not 'gossip' with colleagues about what has been said to you</p>

## Appendix 2

### School Code of Behaviour - for All Staff and Volunteers

#### Interaction with Pupils: Model Code of Conduct for Staff

#### **Employees and Adults must not :**

1. Staff and volunteers **should not** spend excessive amounts of time alone with children, away from others. Meetings with individual children should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff or volunteers should be aware of the meeting.
2. Staff and volunteers are **advised not to** make unnecessary physical contact with children. However, there may be occasions when physical contact is unavoidable, such as providing comfort at times of distress, or physical support in contact sports or similar. In all such cases contact should only take place with the consent of the child.
3. It is **not good practice** to take children alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians) and the head or a member of the SMT.
4. Staff and volunteers **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. **You should just record the facts and report these to a designated person.**
5. Staff and volunteers should **never** (even in fun) –
  - a. Initiate or engage in sexually provocative conversations or activity.
  - b. Allow the use of inappropriate language to go unchallenged.
  - c. Do things of a personal nature for children that they can do themselves.
  - d. Allow any allegations made by a child go without being reported and addressed, or either trivialise or exaggerate child abuse issues.
  - e. Make promises to keep any disclosure confidential from relevant authorities.
6. Staff or volunteers **should not** show favouritism to any one child, nor should they issue or threaten any form of physical punishment.

#### **Employees and Adults must**

1. Staff and volunteers **must respect** children's rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviour they do not like.
2. Staff and volunteers **will be expected** to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their role within the school.
3. All staff and volunteers **should be aware** of the procedures for reporting concerns or Incidents, and should familiarise themselves with the contact details of the [Designated Safeguarding Lead](#).

4. If a member of staff or volunteer finds himself or herself the subject of inappropriate affection or attention from a child, **they should** make others aware of this.
  
5. If a member of staff or volunteer has any concerns relating to the welfare of a child in his/her care, be it concerns about actions/behaviours of another staff member or volunteer, or concerns based on any conversation with the child; particularly where the child makes an allegation, they should report this to a [Designated Safeguarding Lead](#).

**Appendix 3**  
**Pastoral Care Concern Sheet**

Pupil's Name:	D.O.B:	Class:
Teacher:	Date:	
Details of incident / concern:		
Action taken:		

## Useful Contact Details

**The Designated Safeguarding Lead (DSL): Herve Glasel**

**The Deputy Designated Safeguarding Lead: To be appointed**

### Local Safeguarding Children Board (LSCB)

[http://www.londoncp.co.uk/consultation/alleg\\_staff.html](http://www.londoncp.co.uk/consultation/alleg_staff.html)  
[http://www.londoncp.co.uk/consultation/alleg\\_staff.html](http://www.londoncp.co.uk/consultation/alleg_staff.html)

## Key Contacts and Resources

**Ofsted** Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234

Email: [enquiries@ofsted.gov](mailto:enquiries@ofsted.gov) Web: [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

### Disclosure and Barring Service (DBS)

Address for referrals: PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795

Telephone for customer services: 0870 909 08 Email: [customerservices@db.s.gsi.gov.uk](mailto:customerservices@db.s.gsi.gov.uk)

**NSPCC Child Protection Helpline:** 0808 800 5000

**Childline:** Tel: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

**Deficiencies and Weaknesses:** It is the duty of all members of Staff and the proprietor to draw to the attentions of the DSL any weakness or deficiencies in this policy. The DSL will ensure that this is then followed up without delay, with policies and procedures being updated as needed rather than waiting to any regular review date.

**Complaints:** All complaints arising from the operation of this policy should be referred to the DSL. The Proprietor will arrange for the complaint to be investigated.

**References - This policy has also been drawn up with reference to the following:**

**Education (Independent School Standards) (England) Regulations (2014) and (January 2015)**  
<http://www.legislation.gov.uk/id/uksi/2014/3283>

**Preventing and tackling bullying (DfE: 2014)**  
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

**DfE and ACPO drug advice for schools** <https://www.gov.uk/government/publications/drugs-advice-for-schools>

**Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism (HM Government: 2015)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/425189/Channel\\_Duty\\_Guidance\\_April\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf)

**Domestic | violence and Abuse** <https://www.gov.uk/domestic-violence-and-abuse>

**Female genital mutilation: multi agency practice guidelines (HM Government 2014)**

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

**Preventing youth violence and gang involvement (Home Office: March 2015)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

**The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (HM Government: June 2014)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322310/HMG\\_Statutory\\_Guidance\\_publication\\_180614\\_Final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf)

**National action plan to tackle child abuse linked to faith or belief**

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

**No Health Without Mental Health strategy**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/213762/dh\\_125123.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213762/dh_125123.pdf)

**Keeping Children Safe in Education. Statutory guidance for schools and colleges. (DfE: July 2016)**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

**This is Abuse Discussion Guide (Home Office: 2013)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/443659/Discussion\\_Guide\\_-\\_This\\_is\\_Abuse\\_update\\_July15\\_v2\\_Final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443659/Discussion_Guide_-_This_is_Abuse_update_July15_v2_Final.pdf)

**Working Together to Safeguard Children (2015)** [Working Together to Safeguard Children 2015](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443659/Working_Together_to_Safeguard_Children_2015.pdf)

**Children and Families Act (2014)** <http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

**Safeguarding children in whom illness is fabricated or induced**

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

**Schedule 10 of the Equality Act (2010)**

[http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga\\_20100015\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf)

**Special Educational Needs and Disability Code of Practice, 0-25 years (DfE and Department for Health: January 2015)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/398815/SEND\\_Code\\_of\\_Practice\\_January\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf)

**Safeguarding Our Children - 4LSCB Procedures (2007)**

<http://www.4lscb.org.uk/documents/4lscbproceduresupdated220708.pdf>

**Supporting children and young people who are bullied: advice for schools (DfE: 2014)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444864/Supporting\\_bullied\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444864/Supporting_bullied_children.pdf)

**Guidance for Safer Working practices for Adults who Work with Children and Young People (2007)**

<http://www.everychildmatters.gov.uk/resources-and-practice/IG00311/>

**What to do if you suspect a child is being sexually exploited (DfE: 2012)**

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

**What to do if you're Worried a Child is Being Abused (HM Govt. 2015)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

**Counselling in Schools: a blueprint for the future (DfE: March 2015)**

<https://www.gov.uk/government/publications/counselling-in-schools>

**Mental Health and Behaviour in School (DfE: March 2015)**

<https://www.gov.uk/government/publications/mental-health-in-schools>

**Safeguarding children who may have been trafficked: practice guidance DfE and Home Office: 2011)**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf)

This policy will be reviewed annually by the Board, also an independent audit will be carried out to ensure its effectiveness, the single central register will be reviewed by the head of HR annually.

**Date: July 2016**

**Review: July 2017**