



WESTMINSTER UNDER SCHOOL

POLICY ON SAFEGUARDING (CHILD PROTECTION)

If you think a child is in immediate danger, or you believe a crime has been committed, ring the police on 999 before doing anything else.

Key Personnel and Contact Details

School safeguarding personnel

Designated Safeguarding Lead for Child Protection (“DSL”):
David Bratt, Deputy Master (dave.bratt@westminster.org.uk)

Deputy Designated Safeguarding Lead (“DDSL”): Hannah Verney, Assistant Master (Pastoral)
(hannah.verney@westminster.org.uk)

Deputy Designated Safeguarding Lead (“DDSL”):
Michael Woodside, Assistant Master (Extra-Curriculum) (michael.woodside@westminster.org.uk)

Deputy Designated Safeguarding Lead (“DDSL”):
Rupert Candy (rupert.candy@westminster.org.uk)

External safeguarding contact details

Local Authority Designated Officer (LADO):
Westminster City Council Duty Team, (John Griffin, Leonie Bingham or Prabha Vashee – Tel. 020 7641 7668)

Anyone with a concern about a child can make a referral to the Tri-Borough Local Safeguarding Children Board (LSCB):
<https://www.rbkc.gov.uk/sharedservices/lscb.aspx>

Police:

Dial 999 in emergency or 101 in other circumstances

Westminster Children's social care:

accesstochildreancesservices@westminster.gov.uk or tel: 020 7641 4000

Westminster Prevent Team

Kiran Malik, Prevent Programme Manager (kmalik@westminster.gov.uk, 020 7641 5071)

DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors is:

020 7340 7264 and counter-extremism@education.gsi.gov.uk

Advice can be sought at any time from the NSPCC helpline 0808 800 5000 and help@nspcc.org.uk

Key school personnel

The Master:

Mark O'Donnell (mark.odonnell@westminster.org.uk)

Chairman of the Governing Body:

The Very Reverend Dr John Hall, Dean of Westminster
(chairofgovernors@westminster.org.uk)

Governor with responsibility for Child Protection at Westminster Under School:

The Reverend Canon Jane Sinclair (jane.sinclair@westminster-abbey.org)

The School Counsellor:

Lois Adams (lois.adams@westminster.org.uk)

Independent Listener:

The Reverend Graham Buckle: tel. 020 7834 1300

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Introduction

Overview

Westminster Under School makes the School's Safeguarding Policy available to anyone. Members of staff are required to read it and the School ensures that it is fully implemented.

The policy is updated annually, or more frequently if required (e.g. where there is a change in legislation). It is provided to all staff and published on the staff intranet. Children and parents are informed of the policy which is also published on the School's website.

This policy applies to all individuals working in or for Westminster Under School ("the School"), including all teaching and non-teaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to "staff" in this policy should be interpreted as relating to the aforementioned unless otherwise stated.

The Governing Body and staff of the School fully recognise that safeguarding is everyone's responsibility; that all staff and pupils have a role to play in safeguarding children and providing a safe environment in which children can learn. We do this by promoting the welfare, physical, mental and emotional health and safety of our pupils, and by recognising the importance of the School as a source of stability in the lives of all its pupils, but particularly those children who have suffered or who are at risk of harm.

The School operates on the basis of a co-ordinated and child-centred response to all safeguarding concerns. This means that staff should always consider what is in the best interests *of the child*.

Definition: Safeguarding

Safeguarding and promoting the welfare of children is defined as:

1. protecting children from maltreatment;
2. preventing impairment of children's health or development;
3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
4. taking action to enable all children to have the best outcomes.

Terms of reference – External Documentation

The School also works to create an environment where pupils, parents and all staff feel able to raise concerns and where staff feel supported in their safeguarding role. This policy complies with *Independent School Standards Regulations (ISSRs, 2014)*; *Keeping Children Safe in*

Education (KCSIE, September 2018), *Working Together to Safeguarding Children* (July 2018), *Prevent Duty Guidance for England and Wales* (2015); and *Safeguarding children and young people* (Charity Commission Policy Paper 2014).

This list is not exhaustive and due regard is given to a wide range of other important documents published by HM Government and other leading bodies.

Terms of Reference – Internal Documentation

This policy is linked with a number of other key school documents:

- Anti-bullying policy
- Behaviour, Rewards and Sanctions policy
- Data Protection policy
- E-safety policy
- Recruitment policy
- Staff Code of Conduct
- Supervision of Pupils policy (incorporating Policy on Pupil Attendance)
- Whistleblowing policy

Data Protection

Written safeguarding records count as “sensitive personal data” under the General Data Protection Regulation and Data Protection Act (HM Government 2018): they do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. As such, this is not a barrier to sharing information, and the duty to safeguard children overrides data protection obligations; however, parents who ask to see the records may be allowed access, provided this does not put children at risk and that any questions of the child’s consent are satisfied.

The Designated Safeguarding Lead and Deputies

The School appoints a Designated Safeguarding Lead (DSL) who is a member of the School’s senior management team and who takes lead responsibility for safeguarding and child protection. The DSL receives full training before taking up the role and attends further training sessions every two years as well as keeping up to date with safeguarding developments regularly, and at least annually.

There are also three Deputy DSL appointed who are trained to the same level as the DSL and can act appropriately when safeguarding issues arise if the DSL is unavailable. During term time the DSL or a Deputy DSL will always be in school during school hours. The details of the members of this Safeguarding Team are on the first page of this policy. If in exceptional circumstances the DSL or a Deputy DSL are not available, this should not delay appropriate

action being taken. Staff should consider speaking to a member of the Senior Management Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

While the DSL can delegate some safeguarding responsibilities to the deputies, the ultimate responsibility for safeguarding lies with the DSL. Annex B of KCSIE 2018 outlines the duties of the DSL.

Undertakings

Principles

The School gives primacy to the protection of its pupils, and seeks to provide a caring, safe and positive environment in which each individual child can grow and flourish, develop their own particular talents, and thereby find enjoyment and fulfilment. To this end:

- The School will support every pupil's development in ways that will foster their sense of security, confidence and independence, and in a manner that has respect for the dignity, privacy and beliefs of all, and which does not discriminate on the basis of gender, ethnicity, beliefs, race, culture, religion, caste, sexual orientation or disability. Further details are outlined in the [Policy on Behaviour, Rewards and Sanctions](#).
- The School recognises that the welfare of the child is paramount. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs; all children without exception have the right to protection from abuse.

Recruitment

- The School will comply fully with the Government's published policies on safer recruitment, making the appropriate checks on all staff (including governors, employees, volunteers and contractors), through the Disclosure and Barring Service (DBS) and by obtaining and following up references.
- Assurance is obtained that appropriate suitability checks apply to any staff employed by another organisation who might be working onsite (such as building or service contractors) and to any individual working with the School's pupils (such as after school clubs) or on an external site (such as on school visits). Any individual working on our School site, and/or off-site with our pupils, for whom an enhanced DBS check with the barred list has not been obtained will not be allowed to work in regulated activity and will be supervised by School staff at all times.
- The School's safer recruitment procedures are set out in full in the School's Policy on Safer Recruitment. These comply with Part 3 of KCSIE (September 2018), the Safeguarding Vulnerable Groups Act 2003 and other relevant safer recruitment guidance to ensure that no-one is employed within, by or on behalf of the School who is unsuitable to work with children.

Training

- The School trains all staff, regardless of their role, to be vigilant and watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse and neglect.
- To this end, all staff members receive appropriate safeguarding and child protection training which is regularly updated in line with the Tri-Borough LSCB's guidance. In

addition, all staff members receive safeguarding and child protection updates (via email and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff. The training for all staff will cover a number of aspects, including but not limited to

- (i) Part 1 of KCSIE, this policy and the staff Code of Conduct.
 - (ii) the signs that a child may be in need of Early Help or additional support, at risk of harm or suffering from harm;
 - (iii) indicators of abuse and neglect and specific safeguarding issues;
 - (iv) what to do if a child discloses abuse, including that confidentiality should never be promised and to avoid asking leading questions;
 - (v) how to escalate concerns about a child and allegations of abuse;
 - (vi) inter-agency working, including in the context of a referral made to children's social care and/or the LADO, the statutory assessment process and that the staff member may be asked to contribute to a child protection strategy meeting;
 - (vii) Early Help;
 - (viii) peer on peer abuse;
 - (ix) online safety;
 - (x) information sharing;
 - (xi) guidance for staff on boundaries and appropriate behaviour, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on);
 - (xii) the existence and whereabouts of this policy, other relevant policies and safeguarding documentation including local authority procedures;
- As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:
 - (i) this policy;
 - (ii) Keeping Children Safe in Education (September 2018) Part 1 and Annex A for adults working directly with children;
 - (iii) the School's Code of Conduct;
 - (iv) the School's Whistleblowing Policy
 - (v) the School's Policy on Behaviour, Rewards and Sanctions; and
 - (vi) the role of the DSL.
 - Staff are obliged to sign to note they have read and understood the relevant sections of KCSIE, this policy and the School's Code of Conduct.

- All staff are obliged to re-read and understand at least KCSIE Part 1 (and Annex A for adults working directly with children) each time it is updated by the DfE, and are told of updates by the DSL and Deputy DSL. Mechanisms to assist them in understanding KCSIE include regular updates in staff meetings, the issue of the wallet-sized pink safeguarding cards (see Appendix A below) and short online quizzes.

Communications and sharing information internally

- The School emphasises the need for good levels of communication between all members of staff to ensure that a structured procedure for the safeguarding of children will be followed in cases of suspected abuse. (See Appendix C below) The School recognises the importance of information sharing in protecting children from harm and promoting children's wellbeing. The danger of not sharing information is highlighted in a number of serious case reviews. The School shares information in accordance with the General Data Protection Regulations (2018) and the guidance set out in Chapter 1 of [Working Together to Safeguard Children](#) (2018) and in [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (2018). The DSL is trained on the above guidance and works with staff to ensure that:
 - a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children;
 - b) they understand and follow this guidance; and
 - c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.
- The School provides a systematic means of identifying and supporting all children who are suspected of being in need of Early Help or additional support, or at risk from harm, and of handling such cases appropriately in line with the procedures set out below.
- Within the School's PSHEE programme, the Computing programme of study, during Church addresses and assemblies, and elsewhere in the curriculum, pupils are taught key safeguarding issues including but not limited to:
 - Safety online (see the [Policy on e-Safety](#));
 - The dangers of radicalisation (within the PSHEE curriculum);
 - Issues surrounding consent to sexual acts (within the PSHEE curriculum).
- The School recognises that it plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults within an ethos built upon care, support and protection. To this end, all pupils (and members of staff) will have access to the document '*Advice on how to stay safe*' which sets out whom pupils should contact if they are worried or in difficulty. This document is also discussed in PSHEE lessons with all new pupils.
- The School will ensure full written records of all child protection procedures are maintained and stored confidentially. All concerns, disclosures or allegations, decisions and subsequent actions will be recorded securely and confidentially. All discussions, the decisions made and the reasons for these decisions will be recorded.

Communications and sharing information externally

- Where pupils move to new schools, their child protection files will be transferred securely, separately from the main file, and a confirmation of receipt will be requested. Consideration will be given to sharing information in advance of sharing the child protection file. The retention and destruction of files will be in accordance with the School's Data Protection Policy.
- The School follows the inter-agency and child protection procedures laid down by the Tri-Borough LSCB, including but not limited to their threshold document and assessment procedures. The School is fully committed to inter-agency working in line with statutory guidance and this forms part of the DSL and staff training. We work with all external agencies in the best interests of the child, including the local Police and Children's Services (Duty Desk: 020 7641 7668), who will be approached for advice and referral. Information will be shared securely with other professionals and local agencies.

Contextual Challenges

Children with Special Educational Needs or Disabilities

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by bullying – without outwardly showing any signs;
- Communication barriers and difficulties overcoming these barriers.

The study skills department works with these pupils and help to identify such barriers; and the staff there provide another opportunity, in addition to those available to all pupils, for these children to raise safeguarding concerns.

Looked After Children (LACs)

A Looked After Child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority. The most common reason for children becoming looked after is as a result of abuse and/or neglect.

The School does not currently have any LACs but it may do in the future. All staff should understand how to keep LACs safe. Where a staff member comes into contact with an LAC, they will be provided with the information they need in relation to the child's legal status and contact arrangements with birth parents or those with parental responsibility. They will also be provided with the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him. The Deputy Master takes the lead on all LACs and will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Children at Risk of Significant Harm, Abuse and Neglect (Level Four)

Level Four, the highest level of need, is defined by Section 47 of the Children Act 1989.

At this level, children are either suffering, or at risk of suffering, significant harm. Significant harm is caused when a child's health or development is seriously or permanently altered or damaged. Inflicting significant harm on a child, or failing to act to prevent it, is a definition of child abuse and neglect.

All 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.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). They may be abused by an adult or adults, or another child or children.

Detailed symptoms, indicators and behaviours associated with child abuse can be found in *Child Maltreatment: when to suspect maltreatment in under-18s* (NICE, 2017) and a broader treatment is available in *What to do if you're worried a child is being abused: advice for practitioners* (HM Government, 2015).

Physical abuse

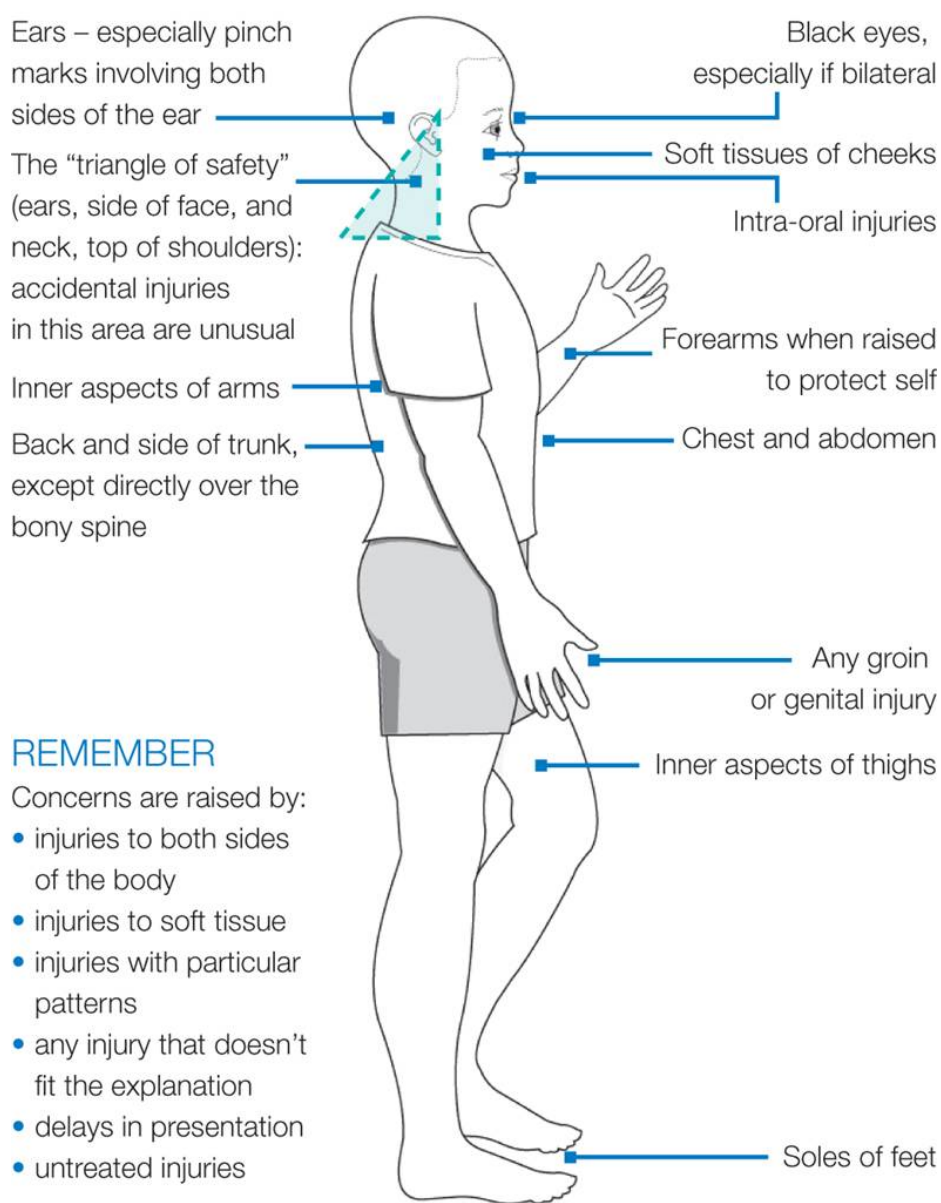
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in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

Signs that may indicate Physical Abuse:

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

Typical accidental injuries involve knees, shins, elbows, palms of the hands, chin and forehead. They are in keeping with any explanation given and the development of the child.

The body map below shows injuries which are less likely to have been caused accidentally and are therefore possible indicators of physical abuse.



Emotional abuse

Emotional abuse is 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 cyber-bullying), 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.

Signs that may indicate Emotional Abuse:

Children:

- Over-reaction to mistakes
- Lack of confidence / self-esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and /or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

Parents or carers:

- Parents or carers who withdraw their attention from their child, giving the child the ‘cold shoulder’
- Blaming their problems on their child
- Humiliating their child, for example, by name-calling or making negative comparisons

Sexual abuse and Child Sexual Exploitation (CSE)

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.

Signs that may indicate Sexual Abuse:

- Sudden changes in behaviour and school performance
- Displays of affection which are sexual and age inappropriate

- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for gym activities
- Sexually Transmitted Diseases

Child sexual exploitation (CSE) 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.

Signs that may indicate CSE:

- Children who appear with unexplained gifts, money 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;
- Children who regularly miss school or education or don't take part in education; and
- Children who present with depression or are withdrawn.

Members of staff need to be aware that, under the Sexual Offences Act 2003, it is an "abuse of a position of trust", and thus a criminal offence, for someone working in a school to "groom" or engage in sexual activity with a pupil aged under 18. The consent of the pupil (or the agreement of his or her parents) is irrelevant. Staff should also note that, under the Serious Crime Act 2015, it is now a criminal offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a response which is sexual. A relationship between a member of staff and a pupil over the age of 18, or a recent former pupil, is almost certain to be judged inappropriate by the School and will lead to an assessment of that member of staff's suitability for work in an educational context.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including

exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may indicate Neglect:

- Poor personal hygiene
- Frequent tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Running away
- Loss of weight / being constantly underweight
- Low self esteem
- Poor dental hygiene

Children Missing from Education

The School understands its duty, as explained in KCSIE, in relation to the risks posed by children missing from education. All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect and the School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School's list under the circumstances outlined in KCSIE.

All staff must also be aware of their role to prevent children from going missing from education. The School will take appropriate action to find any pupil who is discovered to be missing from the School; the Deputy Master should normally be informed in the first instance and will co-ordinate the action taken. A written record is made of any incident of a pupil missing from the School, the action taken, and any reasons given by the pupil for being missing. The School will ensure that any pupil currently on the Child Protection Register who is absent without explanation for two days is referred to Children's Services. For further details of the School's procedures and responses please see the [Supervision of Pupils Policy](#). This contains the School's procedures for unauthorised absence, including on repeat occasions, as well as referral to the local authority.

Radicalisation and Preventing Extremism

It is the School's duty (the Prevent duty) to have due regard to the need to prevent pupils from being radicalised and/or drawn into terrorism. It recognises that during the radicalisation process 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. 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, online, or where specific needs for which an extremist or terrorist group may appear to provide an answer to their psychological or emotional problems. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.

The School is aware of the need to be alert to the risk of radicalisation. 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, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by identifying individuals at risk; assessing the nature and extent of that risk; and developing the most appropriate support plan for the individuals concerned.

The referral procedures set out below also apply where there are concerns about children who may be at risk of being drawn into terrorism. The DSL is the designated Prevent duty person responsible for co-ordinating action within the School and liaising with other agencies, including the Prevent Lead. The School has assessed the risk of radicalisation posed to the School's pupils and at present it considers the current risk to be low.

- The School will work in partnership with parents and with other agencies, including Police, LCSB and the Westminster City Prevent and Channel teams.
- The DSL will attend Prevent awareness training and provide advice to other members of staff.
- The School will help young people stay safe online through appropriate filters (see the [Policy on e-Safety](#)).
- Any visiting speakers to the School will be vetted by the Deputy DSL, and a record kept by him, in order to prevent extremist views being expressed without challenge.
- The School will work more generally to ensure that Fundamental British Values of democracy, rule of law and acceptance of others are celebrated, modelled and are not undermined.

Signs that may indicate Radicalisation:

- A conviction that their religion, culture or beliefs are under threat and treated unjustly;
- a tendency to look for conspiracy theories, and a distrust of mainstream media;
- a sense of debt or guilt;
- blaming parents for family problems;
- feeling let down, and perhaps 'religious seeking';
- peer pressure, low self esteem, and/or the need for identity and belonging;
- physical change/growth spurt (being bigger than peers);
- being secretive about who they have been talking to online and what sites they visit;

- switching screens when you come near the phone, tablet or computer;
- possessing items – electronic devices or phones – you have not given them;
- becoming emotionally volatile.

Honour-based Violence and Female Genital Mutilation

Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community. Female Genital Mutilation (FGM) and forced marriage are examples of such. All forms of HBV are abuse (regardless of motivation) and should be handled and escalated as such.

Although the School is an all-boys school, staff need to be mindful of information they may become aware of regarding the boys’ sisters, other female relatives or friends. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she has a personal statutory duty to report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. Unless the teacher has good reason not to, they should still consider and discuss the case with the DSL and involve children's social care as appropriate. This duty does not apply where a teacher merely *suspects* that an act of FGM may have been carried out or that a girl may be at risk of FGM. In all ‘at risk’ or suspected cases and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL immediately. Any non-teaching staff with concerns about FGM should report their concerns to the DSL immediately.

Peer on Peer Abuse

Young people under the age of 18 are capable of physically, sexually or emotionally abusing other people under the age of 18. It is no longer acceptable to tolerate peer-on-peer abuse, dismiss it as normal behaviour amongst children, or pass it off as “banter” or “part of growing up”. Staff should not develop high thresholds before taking action: it must be taken as seriously as abuse by adults and be subject to the same safeguarding procedures. Members of staff must not attempt to deal with peer-on-peer abuse as a pastoral, classroom or disciplinary issue, and should not impose their own thresholds before consulting the DSL. It is true that there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting or experimenting sexually. The DSL can advise staff on the thresholds which pertain to different definitions of peer-on-peer abuse, and in some cases may seek further clarification from pupils.

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment;

- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

If there is reasonable cause to suspect that a child is suffering or likely to suffer harm at the hands of another child, the DSL will refer the matter to the local authority or the police, whose directions the School will then follow. Allegations against pupils who have left the School but remain under 18 will be passed to the police and / or the Local Authority in the area in which the pupil is currently living. Generally speaking the School will always quickly inform the parents of victim(s) and perpetrator(s) of potential peer-on-peer abuse, unless (a) it has reason to believe that a child is at risk of significant harm, and doing so would make the situation worse or (b) it has been told not to by the police or local authority.

A victim of peer-on-peer abuse is likely to need considerable support. In addition, the perpetrator is likely to have unmet needs (the evidence suggests such children have often suffered disruption in their own lives) as well as posing a significant risk of harm to other children. As such, a pupil against whom an allegation of abuse has been made may be suspended from the School during an investigation. After the immediate issues have been addressed, and depending on the severity of those issues, the Local Authority may decide to oversee risk assessments and care plans for the victim and / or the perpetrator, in which case the School will cooperate fully; the local authority may decide to hand the matter back to the School, in which case the needs of the victim and / or perpetrator will be addressed as appropriate.

The school actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the School community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Children are educated about the nature and prevalence of peer on peer abuse via PSHEE lessons, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse.

Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it.

Signs that may indicate Peer on peer abuse:

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect;
- Physical injuries;
- Having difficulties with mental health and / or emotional wellbeing;
- Becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much;
- Drugs and / or alcohol use;

- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
- Children who have:
 - witnessed or experienced abuse or violence themselves;
 - suffered from the loss of a close family member or friend; or
 - experienced considerable disruption in their lives.

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding policy. If a child is in immediate danger or at risk of harm, a referral to children's social care and/or the police should be made immediately.

For further information on peer-on-peer abuse, see Appendix D.

Child on child sexual violence and sexual harassment

These matters are often complex and will require support from the LADO and police, as necessary.

Victims should be immediately reassured that they have acted appropriately in reporting the matter and they must not be given the impression that they are creating a problem by making such a report, nor should they be made to feel ashamed.

Reports should be managed in accordance with good practice.

Where there is a report of sexual violence, the DSL should make an immediate risk and needs assessment, then keep those assessments under review. This must consider:

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

Engagement with specialist services will then be required.

Careful consideration will be given to:

- The wishes of the victim in terms of how they want to proceed;
- Any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;

- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school staff; and
- Other related issues and wider context.

Consideration, with the support of professionals, will be given as to how the matter will be handled.

- Manage internally;
- Early Help;
- Referrals to children's social care;
- Reporting to the police.

If there are delays in the handling of these issues, the priority will remain the protection of the victim and their ongoing welfare; coupled with that must a commitment to the safeguarding and support of the alleged perpetrator.

Sexting (or Youth Produced Sexual Images)

Sexting is defined here as 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Creating and sharing sexual photos and videos of under-18s is illegal. When an incident involving sexting comes to the School's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate School staff.
- There should be subsequent interviews with the pupils involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the pupil at risk of harm.
- At any point in the process if there is a concern a pupil is in need or at risk of harm a referral should be made to children's social care and/or the police immediately, in accordance with the procedures set out in this policy.

Online Safety

Safeguarding of children extends to the online environment. All staff should be aware of the risks posed to children by technology and the Internet and should understand their role in preventing, identifying and responding to harm caused by its use.

The School has adopted a whole school approach to online safety which captures the range and complexity of the risks and of children's experiences of those risks; seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the Internet; and handles all cases of online harm appropriately and with sensitivity. This policy should be read alongside the School's [Policy on e-Safety](#) and which

sets out the School's approach to online safety in further detail. In particular, this policy sets out the risks posed to children by the Internet and technology, the indicators that a child may be at risk of such harm, and the measures taken by the School to mitigate these risks, including pupil and parent education, staff training, and limiting the risk of harm caused by the School's IT systems (e.g. appropriate filters). If a staff member suspects that a child may be at risk of or causing harm to others online, s/he should follow the procedures for referral to the DSL set out in this policy.

Domestic Violence

This is a safeguarding issue and children and young people are at risk physically and emotionally and also vulnerable in terms of keeping themselves safe from others. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Self-harm

This includes deliberately cutting one's own skin, eating disorders and substance abuse. Members of Staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Serious Bullying

Bullying can take many forms. Broadly, it is unkind and usually persistent behaviour intended to assert the power of one person over another, usually by frightening or humiliating them. It may take the form of verbal, physical or emotional abuse or harassment. A victim may be picked on because of gender, race, religion, culture, physical appearance, sexual orientation, a special educational need or disability – or for no obvious reason at all. The [Policy on Anti-bullying](#) contains further details on the School's approach. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Gangs and child criminal exploitation

Criminal exploitation of children is a geographically widespread form of harm: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the *National Referral Mechanism* (June 2018) will be considered.

This can affect any child or young person (male or female) under the age of 18 years. It

- Can still be exploitation even if the activity appears consensual;
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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

Other actions to cause concern

Children may find themselves in situations that are not listed above but still might be at significant risk. These might include, for example, situations where another child in the household has been harmed or the household contains a known abuser.

Children in Need (Level Three)

At this level, which is defined by Section 17 of the Children Act 1989, a child is not immediately at risk, but his or her needs are already regularly unmet, and without the intervention of specialist support services working in partnership with the family, the child's situation will probably deteriorate still further.

Signs that may indicate a child in need:

Children

- Chronic or significant ongoing health issues
- A disability requiring significant support
- Weight or growth falling two centile ranges (without diagnosed medical problem)
- Missing most immunisations
- Frequent or persistent accidents
- Significant mental health issues
- Evidence of self-harm
- Suicidal thoughts (but without plans or intent)
- An acrimonious, perhaps aggressive relationship with parents
- Significant caring responsibilities at home
- Inappropriate sexual behaviour or activity under 16
- Frequently in risky situations: deliberately puts others or self in danger
- Engagement in risky online behaviour
- Behaviour at school which may lead to exclusion
- Subject to persistent discrimination
- Repeated expressions of low self-esteem

Parents or carers

- A family experiencing a crisis which may result in breakdown of care
- Parents separated, with conflict over contact (child may be used as a pawn)
- Parents are inconsistent in their attachment to child: child is rarely comforted or encouraged
- Supervision of child is sometimes unsafe
- Parents sometimes use inappropriate caregivers

- Parents struggle to provide for child's basic physical or emotional needs as a result of mental health or disability issues, substance misuse (including alcohol) or domestic abuse
- Parents frequently put their own needs above those of child

Members of staff with information about such matters must bring it to the attention of the DSL, who will consult with the local authority.

Early Help Plans (Level Two)

At this level, a child is not immediately in need, but may be vulnerable to emerging issues that may turn into more serious and longer-term issues if left unaddressed.

Signs that may indicate an Early Help Plan is needed:

Children

- A disability or physical illness which requires some support
- Newly arrived in the UK
- Slight speech or language issues
- Missing routine health appointments
- Missing some immunisations
- Slow physical development
- Minor dietary issues
- Minor mental health issues emerging
- Exploring alcohol abuse or low-level drugs relationships are sometimes risky
- Clothing and / or personal hygiene raise low-level concerns
- School attendance is noticeably low
- Special Educational Needs
- Struggling academically
- Escalating behaviour issues
- Questioning self-worth
- Has some caring responsibilities in family

Parents or carers

- Family relationships are strained
- Family are experiencing issues such as bereavement or divorce
- Parents are experiencing parenting challenges
- Parental supervision raises low-level concerns
- Parents are over-protective

The school is likely to seek advice from Children's Services in such a circumstance. Usually, Children's Services will refer the matter back to the School to put together an Early Help Plan which will seek to inform the pupil's family more formally in providing support.

EHPs are only drawn up with the parent's full agreement and cannot exist without it. External professionals sometimes assist with this. A copy of any completed EHP is usually sent by the DSL to the local authority covering the pupil's home address, although this can vary between areas.

Individual Welfare Plans (Level One)

Many of our pupils will have temporary issues to do with:

- Health concerns
- Family issues
- Academic worries
- Peer relationships etc.

These matters will be addressed successfully by their families and by services that are universally open to all pupils on a daily basis:

- Medical facilities
- NHS services
- Counselling
- Pastoral staff
- Special Educational Needs department etc.

Children whose needs are met by these universal services are said to be at Level One.

There will be a few pupils every year whose difficulties will be such that the School will need to ensure it coordinates services more formally and this is done using an Individual Welfare Plan (IWP). These are not recorded as safeguarding issues unless other factors are involved. With the permission of the pupils (where appropriate), information is shared as early as possible with parents and other agencies.

Procedure for staff dealing with concerns about children (including peer on peer abuse)

Actions (including Early Help) where there are concerns about a child

If a staff member has any concerns about a child, s/he should discuss these with the DSL or the Deputy DSL. The DSL (or Deputy DSL if appropriate) will decide on an appropriate course of action. This discussion and actions taken will be recorded. The flow chart in Appendix C *Actions where there are concerns about a child*, provides a guide to the process.

All staff should be aware of the Early Help process, and understand their role. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment;
- in some cases, acting as the lead professional in undertaking an assessment of the need for Early Help.

All staff should be alert to identifying children who may benefit from **Early Help**. Early Help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of Early Help then s/he should, in the first instance, discuss Early Help requirements with the DSL.

In order to help identify children who may benefit from Early Help a **Vulnerable Children List** is kept by the Assistant Master Pastoral. The School is developing a tracking procedure which will identify possible candidates for the Vulnerable Children list. It is envisaged that this list will have only a few children on it and that they will be on it for only a short time whilst appropriate support is put in place.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, police) there should be an inter-agency Early Help assessment – such as the Common Assessment Framework. This 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. If Early Help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency Early Help assessment as appropriate.

The Early Help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator). Decisions as to who performs this role should be taken on a case by case basis and should be informed by the child and their family.

For an Early Help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them;

- a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority.
- if parents and/or the child do not consent to an Early Help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Effective Early Help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to children's social care if the child's situation does not appear to be improving.

A Child in Need, who has suffered or is at risk of significant harm or in immediate danger

If at any time it is considered that the child may be a Child in Need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to children's social care – in the local authority where the child lives and in accordance with the threshold document published by the relevant LSCB.

If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Any member of staff (or volunteer) may make a referral directly to children's social care. There is a duty on all staff to persist with referrals to children's social care if they feel appropriate action is not being taken. However, all staff are expected to raise concerns with the DSL in the first instance and should inform him if they make a referral directly.

If confronted with a possible case of abuse, or disclosure of abuse, each member of staff should in the first instance follow the simple rules of listening and being supportive, but without asking any leading questions¹. Staff should write up their conversation as soon as possible (as near *verbatim* as possible) and such notes should be signed and dated by the member of staff and handed to the DSL.

If a pupil is deemed to be at risk, or has made an allegation or disclosure of abuse, it must be explained to the pupil that the member of staff is under a duty to report the matter. All staff will be made aware that they have a professional responsibility to share information in order to safeguard children. The pupil will need to be reassured that only the minimum number of people will need to know in order to keep him safe, and that it is in their best interests that the matter is reported. It is not appropriate for staff to conduct any kind of investigation; staff cannot undertake to keep confidential what the pupil has told them. If a member of staff has concerns about an adult's behaviour towards pupils, they must report these to the DSL.

A child's wishes and feelings should be taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback to School staff. These operate with the best interests of the child at their heart.

In each case, discretion and confidence will be maintained at the appropriate level, the DSL being responsible for communicating strategies and decisions to fellow professionals. The DSL will report his response to the Master; keep him apprised of any developments; and maintain the written records.

Peer on Peer abuse

All staff should be alert to the risk of Peer on Peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers; they should never dismiss abusive behaviour as a normal part of growing up, or "banter", and should not develop high thresholds before taking action. Peer on Peer abuse should be taken as seriously as abuse by adults.

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the above procedure. If a child is in immediate danger or at risk of harm, a referral to children's social care and/or the police should be made immediately. For further information on peer-on-peer abuse, please see Appendix D.

Procedure for dealing with concerns or allegations against members of staff

The safety and wellbeing of our boys depend on the vigilance of all our staff and their prompt communication to the Master of any concerns, no matter how small, about any adult's suitability to work with or have access to children.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

When handling allegations, the School will always follow Part 4 of KCSIE. Responsibility for appropriate action rests with the Master. The procedure would be used in all cases in which it is alleged that a teacher or other member of staff or volunteer has:

- a) behaved in a way that has harmed a child, or may have harmed a child;
- b) possibly committed a criminal offence against or related to a child; or
- c) behaved towards a child or children in a way that indicates s/he would pose a risk of harm to children.

Informing others about concerns

Any such concerns or allegations about an adult in the School (or those working with the boys outside the School) should be reported to the Master immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

If the allegation is about the Master, staff must immediately inform the Chairman of the Governing Body (or, in his absence, the Governor with responsibility for safeguarding), without informing the Master.

The Master (or the Chairman of the Governing Body in cases of allegations against the Master) will inform the local authority designated officer (the LADO) of all allegations which meet the criteria above as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. Borderline cases will be discussed without identifying individuals in the first instance. The Master will normally discuss all allegations with the DSL unless it relates to the DSL.

Handling concerns

All allegations will be dealt with fairly, quickly and consistently in a manner that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The LADO will discuss with the Master (or Chairman as above), and any other relevant agencies such as the police, which further steps (if any) should be taken; this could involve informing parents. Where a referral to the police has been made directly the Master (or

Chairman) will inform the LADO of the referral as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. There may be cases where the LADO or police are made aware of an allegation before the School is and in those cases they will notify the School of the allegation immediately. All discussions with external agencies should be recorded in writing.

When an allegation is made, the School will make every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. Where a teacher is facing an allegation of a criminal offence involving a boy registered at the School, the teacher concerned is legally entitled to anonymity until the teacher is charged with an offence, the anonymity is waived by the teacher or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. In particular, the Education Act 2002 prevents the publication of any material which could lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation).

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

The person against whom an allegation is made should normally be informed as soon as possible after the result of the initial investigation is known. However, where a strategy discussion is needed or police or children's social care need to be involved neither the person against whom the allegation has been made nor the individual making the allegation should be informed until these agencies have been consulted.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The School will appoint a representative to keep the person informed of the likely course of action and the progress of the case. They should also advise the individual to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer. They will be kept informed of the timescales in accordance with KCSIE.

Support for Staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or School Counsellor. Similarly, during any protracted procedure arising from claims of abuse, the School Counsellor may be able to offer confidential support to the member of staff.

Suspension

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person, then the person concerned will be suspended. Due weight should be given to the views of the LADO and to the police when making a decision about suspension and all alternative options should be considered prior to taking that step. The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff, the matter will normally be dealt with in accordance with the Staff Disciplinary Procedure. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency (“the TRA”) investigation. In the case of a concern about or an allegation being made against a member of staff resident in Adrian House – if a suspension from work is deemed appropriate while an investigation takes place – that member of staff will be temporarily rehoused in accommodation which is not within Adrian House.

During the course of the investigation, the School in consultation with the LADO will decide what information will be given to parents, staff, volunteers and other pupils and how press enquiries are to be dealt with. Any pupils who are involved will receive appropriate care.

Outcomes

The initial sharing of information and investigation may lead to a decision that no further action is to be taken in which case this decision should be recorded by the Master and an agreement should be reached with the LADO on what information should be put in writing to the individual concerned.

If the outcome is (1) malicious, (2) false, (3) unsubstantiated or (5) unfounded, a confidential record will be kept but the decision will not affect the member of staff’s employment, and it will not be mentioned in any reference for employment elsewhere.

The Master should then consider with the LADO what action should follow, both in respect of the individual and those who made the initial allegation. Where appropriate the matter will be dealt with under the School's Disciplinary Procedure.

If the allegation is (4) substantiated, this will be recorded and will be mentioned in any reference for employment elsewhere.

Record-keeping

A record will be made of all conversations, including any advice or recommendations by the LADO. These records and any associated documentation will be maintained in a folder, which relates exclusively to allegations against staff. A clear and comprehensive summary of all allegations will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The summary will include details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached.

Allegations that are found to have been malicious will be removed from personnel records.

However, for all other allegations, the School will in accordance with KCSIE retain a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decision reached on the personnel record. A copy should be provided to the person concerned.

Following-up

During the course of the investigation, the School in consultation with the LADO will decide what information will be given to parents, staff, volunteers and other students and how media enquiries are to be dealt with. Any pupils who are involved will receive appropriate care.

If it is established that the allegation is false, unsubstantiated or unfounded, a written record will be made of the decision and the justification for it and then the person against whom the complaint has been made would normally be informed that the matter is closed. Allegations that are found to have been malicious will be removed from personnel records and those that are unsubstantiated, are false or malicious will not be referred to in employer references.

The School will promptly report to the Disclosure and Barring Service (DBS), using the DBS referral form, any person who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence: and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. DBS guidance is given in: <http://www.homeoffice.gov.uk/dbs>.

The School will not enter into settlement or compromise agreements to prevent a referral being made to the DBS when it is legally required. Failure to make a report by an employer where the member of staff has harmed or is likely to harm a child constitutes a criminal offence. Failure to make a report by an employer where the member of staff has harmed or is likely to harm a child constitutes a criminal offence.

For teachers, separate consideration will be given to whether to refer the matter to the NCTL in order to consider prohibiting the individual from teaching. Reasons such an order may be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or “conviction, at any time, for a relevant offence”.

The School will always consider what lessons can be learnt from any cases of abuse and how the School's safeguarding systems can be improved to reduce the risk of such abuse recurring.

Historic cases

A colleague who becomes aware of an allegation against a former member of staff, or against a former pupil who is now aged over 18, should pass it to the Master, who will check the existence of other relevant records before promptly informing the Police.

Members of staff who become aware of allegations involving former colleagues or former pupils must otherwise keep the matter wholly confidential.

The Management of Safeguarding and Child Protection

Record-keeping

The DSL is responsible for keeping a secure, accurate written record of concerns raised and actions taken at Levels Three and Four, and for ensuring that the safeguarding file is passed on promptly to the future educational establishment of any pupil leaving the School before the age of 18. Consideration will be given to sharing information in advance of sharing the child protection file.

The school will keep a copy of the file until receipt of the original is confirmed in writing by the new establishment, whereupon the copy will be destroyed. The safeguarding files of pupils who remain at school until age 18 would ordinarily be kept securely for a further six years before being destroyed, but due to the ongoing Independent Inquiry into Child Sex Abuse the School has currently suspended the destruction of records until the inquiry is concluded.

General principles on information sharing (see also Appendix B)

NECESSARY AND PROPORTIONATE

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

RELEVANT

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

ADEQUATE

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

ACCURATE

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

TIMELY

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

SECURE

Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

RECORD

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk they should follow the School's Policy on Whistleblowing.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Where an adult feels unable to raise a concern about poor safeguarding practice with the School, or where they feel that their concern is not being addressed, they can raise their concern externally:

- Guidance can be found at - <https://www.gov.uk/whistleblowing>
- The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: help@nspcc.org.uk

Monitoring, evaluation and review

As proprietor the Governing Body has ultimate responsibility for safeguarding. A member of the Governing Body has leadership responsibility for the School's safeguarding arrangements and is responsible for overseeing safeguarding matters and procedures within the School. This is currently Canon Jane Sinclair. This Governor receives regular safeguarding training. The DSL reports regularly to this Governor responsible for safeguarding procedures and on particular causes for concern.

The Governing Body has a number of specific duties, which are set out in Part 2 of KCSIE and which include oversight of the School's safeguarding policies, the role of the DSL, inter-agency working, staff training, online safety, teaching pupils about safeguarding, inspection, safer recruitment, allegations of abuse made against staff and other children, and children with special educational needs (SEN) and disabilities. The Governing Body discharges these duties by receiving termly reports on safeguarding matters from both the DSL and the Governor with responsibility for safeguarding, enabling it to review how effectively the School is fulfilling its obligations under current legislation; reviewing this policy annually and inspecting the School's single central register.

This policy is reviewed annually by the Governing Body, and updated more frequently as necessary by the DSL. The School regularly assesses the effectiveness of its safeguarding procedures as a whole – in a group including among others the DSL, Deputy DSL and the Governor with responsibility for Child Protection – and will seek to remedy any deficiencies without delay.

Child Protection Procedures (Issued To Staff On A Wallet Sized Card)

WESTMINSTER UNDER SCHOOL

SAFEGUARDING

<p>YOU MUST:</p> <ul style="list-style-type: none"> ■ Follow the Staff Code of Conduct ■ Treat all pupils with respect and act professionally at all times ■ Refer any concerns (DO NOT INVESTIGATE) 	<p>YOU MUST NOT:</p> <ul style="list-style-type: none"> ■ Exaggerate, trivialise or ignore child abuse issues (physical abuse, emotional abuse, sexual abuse or neglect) ■ Promise confidentiality ■ Fail or forget to report something you are concerned about
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WHAT TO DO IF...

...you suspect a pupil is being abused or a pupil makes a disclosure:

- Report the matter immediately to the School's DSL or Deputy DSL. Do not share your concerns with other adults or pupils.

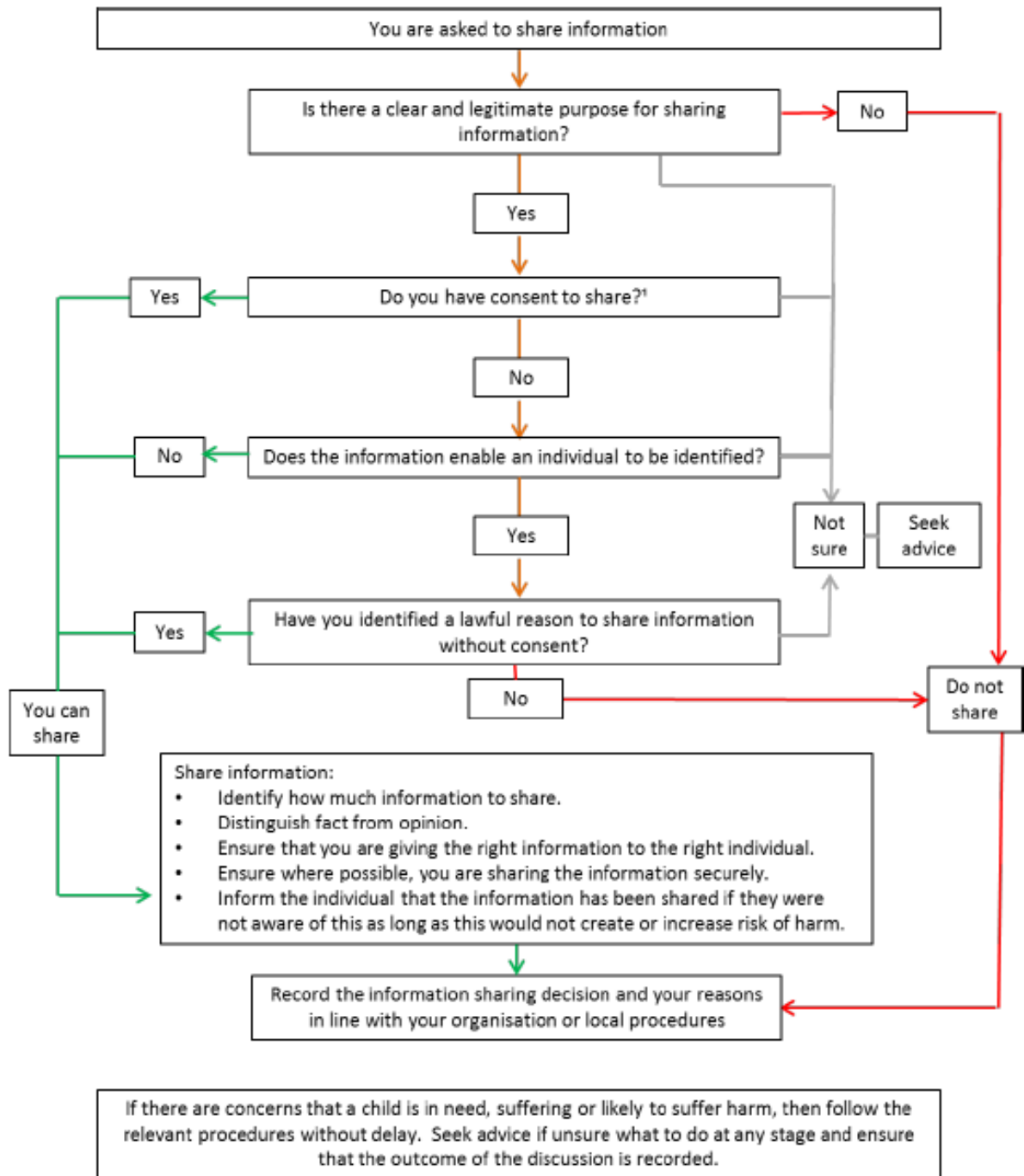
...you receive an allegation about another member of staff:

- Report the matter immediately to the Master, Mark O'Donnell. If the allegation is about the Master, report it to the Chairman of Governors (John Hall, Dean of Westminster).

Key contacts (Designated Safeguarding Leads - DSL)

- David Bratt, Deputy Master & DSL (dave.bratt@westminster.org.uk)
- Hannah Verney, Assistant Master (Pastoral) & Deputy DSL (hannah.verney@westminster.org.uk)
- Michael Woodside, Assistant Master (Extra-Curriculum) Deputy DSL (michael.woodside@westminster.org.uk)
- Rupert Candy, Deputy DSL (rupert.candy@westminster.org.uk)

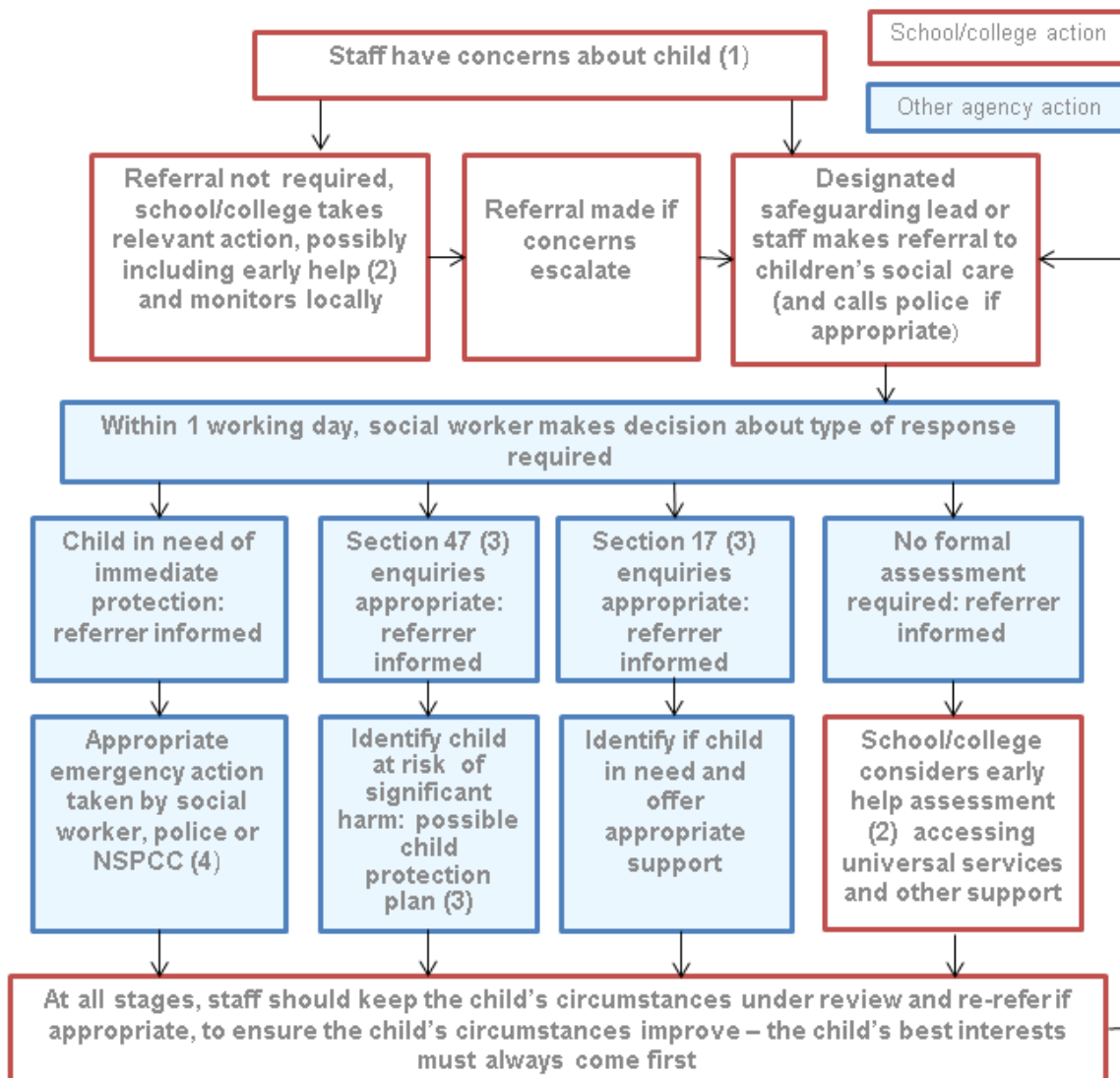
Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

Actions where there are concerns about a child

Actions where there are concerns about a child



Peer On Peer Abuse

All staff should be alert to the risk of Peer on Peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers, they should never dismiss abusive behaviour as a normal part of growing up, or “banter”, and should not develop high thresholds before taking action. Peer on Peer abuse should be taken as seriously as abuse by adults.

What is Peer on Peer abuse?

For these purposes, Peer on Peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying)¹, relationship abuse², child sexual exploitation³, youth and serious youth violence⁴, harmful sexual behaviour⁵, and gender-based violence⁶.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage boy may be in a sexually exploitative relationship with a teenage girl who is herself being physically abused by a family member. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Sexting can but does not always constitute abusive behaviour.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the School's [Policy on Anti-bullying](#) - should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of Peer on Peer abuse?

By being alert to children's wellbeing and to signs of abuse. Signs that a child may be suffering from Peer on Peer abuse overlap with those relating to other types of abuse and include: (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties

¹ Please see the School's Policy on Anti-bullying.

² <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

³ See Appendix A

⁴ Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

⁵ This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

⁶ This is violence that is directed against one gender as a result of their gender.

with mental health and/or emotional wellbeing; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by Peer on Peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- a) Peer on Peer abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour;
- b) children who are particularly vulnerable to abuse or to abusing others include those who have:
 - (i) witnessed or experienced abuse or violence themselves;
 - (ii) suffered from the loss of a close family member or friend;
 - (iii) experienced considerable disruption in their lives.

How prevalent is Peer on Peer abuse?

Recent research suggests that Peer on Peer abuse is one of the most common forms of abuse affecting children in the UK. For example, over a third of young boys in England admitted to watching pornography and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al., 2011).

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding policy. If a child is in immediate danger or at risk of harm, a referral to children's social care and/or the police should be made immediately.

How will the DSL respond to concerns of Peer on Peer abuse?

The DSL will discuss the behaviour with the member of staff and will where necessary take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute abuse children's social care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with children's social care and agree on a course of action, which may include:

- (a) taking any steps to ensure the safety and wellbeing of any children affected;
- (b) further investigation;

(c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services; and

(d) a strategy meeting.

Any response should be decided in conjunction with children's social care and other relevant agencies and should:

- Investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, he may also have considerable unmet needs and be at risk of harm himself.
- take into account the complexity of Peer on Peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including
 - (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his behaviour;
 - (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
 - (c) to ensure the safety and wellbeing of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the School;
- provide on-going support to victim(s) including by
 - (a) ensuring their immediate safety;
 - (b) responding promptly and appropriately to the abuse;
 - (c) assessing and addressing any unmet needs;
 - (d) following the procedures set out in the safeguarding policy (including where the child is in need of Early Help or statutory intervention);
 - (e) monitoring the child's wellbeing closely and ensuring that he receives on-going support from all relevant staff members (including the School Counsellor) within the School;
 - (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term;

- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the School raise awareness of and reduce the risk of peer on peer abuse?

The School actively seeks to prevent all forms of Peer on Peer abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the School community, and responding to all cases of Peer on Peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Children are educated about the nature and prevalence of Peer on Peer abuse via PSHEE lessons, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and Peer on Peer abuse.

Staff are trained on the nature, prevalence and effect of Peer on Peer abuse, how to prevent, identify and respond to it.