

# St Augustine's Federated Schools

## Primary



## Child Protection and Safeguarding Policy

We want all of our community to have equal opportunities to experience life in all its fullness (John 10:10). We encourage all community members to “be the best we can be” in every aspect of their lives as we grow in, and reflect on, the Christian virtues of Faith, Hope and Love (1 Corinthians 13)

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## 1. Important contacts

| Role/Organisation                                                    | Name                                                                                                                                                                   | Contact Details                                                                                                                                      |
|----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Designated safeguarding lead (DSL)                                   | Carla-Sorbello Bali                                                                                                                                                    | <a href="mailto:csorbello@stapprimary.org">csorbello@stapprimary.org</a>                                                                             |
| Deputy DSL                                                           | Sharon George<br>Ruth Vince                                                                                                                                            | <a href="mailto:sgeorge@stapprimary.org">sgeorge@stapprimary.org</a><br><a href="mailto:rvince@stapprimary.org">rvince@stapprimary.org</a>           |
| Local authority designated officer (LADO)                            | Local Authority Designated Officer (LADO)<br><br>NB. initial communications should be via this address and contact number asking for the Duty Child Protection Officer | 020 7641 7668<br><a href="mailto:lado@westminster.gov.uk">lado@westminster.gov.uk</a>                                                                |
| Tri-Borough Safer Organisations Manager and LADO for the Tri borough | Aqualma Daniel                                                                                                                                                         | 07870 481 712<br><a href="mailto:Aqualma.Daniel@rbkc.gov.uk">Aqualma.Daniel@rbkc.gov.uk</a>                                                          |
| Chair of governors                                                   | Mr John McArdle                                                                                                                                                        | <a href="mailto:john@mcardle.co.uk">john@mcardle.co.uk</a>                                                                                           |
| Link Governors                                                       | Fr Richard Norman<br>David McPhail                                                                                                                                     | <a href="mailto:rjnorman@hotmail.co.uk">rjnorman@hotmail.co.uk</a><br><a href="mailto:davidstuartmcphail@gmail.com">davidstuartmcphail@gmail.com</a> |
| Prevent Duty                                                         | Counter Extremism Helpline                                                                                                                                             | 020 7340 7264                                                                                                                                        |

## 2. Policy Statement

**2.1** This document is a statement of the aims, responsibilities and procedures for the protection of children attending St. Augustine's CE Primary School. We recognise that all members of staff, governors and volunteers have a full and active part to play in protecting our pupils from harm. Keeping children safe in education (KCSIE 2025) will accompany this policy and will be discussed each time this policy is reviewed. Upon request, copies of this policy can be obtained by parents and carers from the school office and it can be found on the school website <http://www.st-augustines-primary.co.uk/>.

**2.2** All children deserve to stay safe, to be healthy, to achieve economic well-being, to be enabled to make a positive contribution, to enjoy life and learning and to achieve to the best of their ability. To achieve this, children need to feel loved and valued and to be supported by a network of reliable and affectionate relationships. If they are denied the opportunities and support they need to achieve these outcomes, children are at risk, not only of an impoverished childhood but also of disadvantage and social exclusion in adulthood.

**2.3** We recognise that the COVID-19 pandemic will have had an impact on the health, emotional well-being and development of most children.

**2.4** We recognise that a child who is abused or who is a witness to violence or abuse may find it difficult to develop and maintain a sense of self-worth and therefore in turn to treat others appropriately. We recognise that a child in these circumstances may feel isolated, helpless and humiliated, even when abuse is no longer happening.

**2.5** We recognise that a child who is exposed to inappropriate or extremist views, or who is being taught to oppose fundamental British values, is at risk of harm now or in the future and such concerns are to be managed in the same way as all other safeguarding concerns.

**2.6** We recognise that a child may feel self-blame and the importance of ensuring that children are not made to feel that they are to blame

**2.7** We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

**2.8** We know that resilient children are at significantly less risk of harm now and as future adults.

**2.9** The school will support all pupils by:

- Offering support for pupil mental health through access to resources and direct teaching, but also by offering support from our Educational Psychologist
- Encouraging self-esteem and self-assertiveness, whilst not condoning aggression or bullying.
- Teaching children to understand and manage their emotions and behaviour (self-regulation) - this may require a referral for additional therapeutic support.
- Ensuring that all children know that there is an adult in school whom they can approach if they are worried or in difficulty.
- Promoting emotional wellbeing and ensuring that children see the school as a safe place (this may require support from other professionals for some children).
- Including in the curriculum opportunities to educate our children about personal, social, health, wellbeing and citizenship.
- Promoting a caring, safe and positive environment within the school.
- Ensuring that we always act in the best interests of the child.
- Ensuring every staff member is aware of their duty to safeguard every child and prevent them from experiencing harm, including a teacher's mandatory responsibility to report FGM.
- Identifying children who would benefit from Early Help and making a referral so that they can support children and their families and evaluating the impact of the Early Help to ensure that positive change is taking place.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Services as soon as there is a significant concern (with reference to the Thresholds of Need Guide).
- Monitoring attendance of all pupils, especially those who are subject to a Child Protection Plan or are registered as Children in Need. Notifying the allocated Social Worker where there is unexplained or absence of 2 days or more. Reporting children who are absent from education without explanation (CME) to the M.A.S.H team and liaising with them to ensure children are kept safe.
- Reporting any children who are repeatedly not collected from school to the M.A.S.H team, The A.C.E Team or Education Welfare Officer (E.W.O.) after efforts have been made to resolve the situation.
- Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school.
- Informing the Local Authority when a pupil is taken off roll.

- Ensure that staff, governors and visitors are aware of their Duty of Care and their responsibilities within KCSIE 2025.

### 3. Aims

Our aims in developing this policy:

- To ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare
- To ensure that all staff are aware of their statutory responsibilities with respect to safeguarding
- To ensure that staff are properly training in recognising and reporting safeguarding issues
- To protect children from maltreatment
- To prevent impairment of children's health, emotional well-being and development
- To ensure that children are growing up in circumstances consistent with the provision of safe and effective care
- To clarify action that staff must take to ensure that all children are safeguarded
- To ensure all members of staff are alert to the possible indicators of abuse and apply a systematic and consistent approach to the monitoring children known or thought to be vulnerable or at risk of harm
- To explain the systems and procedures within the school to be followed by all staff in cases of suspected or known abuse
- To promote effective working relationships with parents and external agencies
- To ensure staff are aware of their duty of care towards children and vulnerable adults, including procedures following allegations made against staff
- To ensure staff understand that children may be perpetrators of abuse as well as victims and understand procedures for reporting and supporting all involved

### 4. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- [Working Together to Improve School Attendance \(2022, statutory from 2025\)](#), which requires schools to respond to children who are absent from education where this may signal safeguarding concerns
- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

## 5. Definitions

### 5.1 Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment

- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

**5.2 Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm within or outside of the home, including online.

**5.3 Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children

**5.4 Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**5.5 Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**5.6 Children** includes everyone under the age of 18.

**5.7 Children absent from education:** In line with KCSIE 2025, the term "children missing education" has been updated to "children who are absent from education"

**5.8 Safeguarding partners:** The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

## 6. Types of Abuse

- Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect children by inflicting harm or failing to act to prevent harm wilfully or otherwise. Children may be abused in a family, in an institutional or community setting, by an adult or another child known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Children who witness domestic abuse are also victims. Staff should also remain alert to misinformation, disinformation and conspiracy theories which may expose children to harm online.

There are four main categories of abuse and neglect:

- Physical abuse
- Emotional abuse
- Sexual abuse

- Neglect

**6.1 Physical abuse** 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.

**6.11 Possible indicators of physical abuse include:**

- signs of bruising or physical injury in babies and children
- bruising and burns in unusual or unlikely places
- two simultaneous bruised eyes with no bruising to the forehead
- human bite marks, handprints, fingertip bruises, cigarette burns and any mark with a definite edge
- frequent unexplained injuries or several different explanations provided for an injury, or unexplained delay in seeking treatment
- the explanation of an injury being inconsistent with the actual injury
- absence from school when no signs of illness have been observed
- a child who is usually sociable may become withdrawn and quiet
- a child who is very aggressive towards other children and/or adults
- parents asking staff not to undress their child, or a child refusing to get undressed for P.E. or trying to do so in an awkward manner

**6.12 Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) is the deliberate cutting, changing, partial or total removal of external female genitalia for non-medical reasons. Local terms are used to refer to FGM, but it is also known as female genital circumcision (FGC), cutting, tahor or sunna.

FGM is a form of physical abuse and has been illegal in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence which must be reported directly to the police following procedures set out in KCSIE 2025; if this happens, a CPR should be handed to the DSL immediately afterwards. Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under 18s to the police. There is an NSPCC helpline on 0800 028 3550 or [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk) for professionals, families and children with free and confidential information.

There are no medical reasons to carry out FGM. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health (NSPCC 2014).

Multi-agency practice guidelines for FGM indicate that a girl who speaks of undergoing a special ceremony or ritual related to becoming a woman may be at risk of FGM as might those who are prevented from attending health education or related sessions as it may indicate that they are being prevented from learning about their body and their rights (HM Government 2014).

**6.2 Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another, including witnessing domestic abuse
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**6.21 Possible indicators of emotional abuse include:**

- developmental delay
- abnormal attachment between a child and parent/carer
- indiscriminate or no attachment
- aggressive or disruptive behaviour and an inability to regulate behaviour (including abusing others)
- struggling to remember routines
- frozen watchfulness
- low self-esteem and lack of confidence
- withdrawn, difficulty relating to others
- eating disorders
- self-harm
- absence from school when no signs of illness have been observed

**6.22 Radicalisation:** The signs that a learner is susceptible to extremist ideology and radicalisation, or is exposed to extreme views, are varied and the methods by which radicalisation occurs vary (including social media). Background factors including a child's friendship groups, family, ability to understand what they are hearing and seeing and their wider life experiences contribute to their susceptibility. The setting for this form of abuse is wide ranging, including online. Possible indicators of exposure to extremist views include:

- isolation
- anger
- exclusion or refusal to discuss the views of others
- stress or concerns beyond those usually expected for a child of their age

- challenge to authority beyond what is expected for a child of their age or understanding
- idolising someone new
- opposition to fundamental British values or calling for the death of armed forces
- expressing feelings of persecution or sympathy for extremist views or causes
- change in choice of clothing, reading matter or friendship groups including online identity & contacts
- spending excessive amounts of time online accessing information about extremist causes or supporting them
- reciting slogans or views that could be associated with extremist causes

Learners from all walks of life could be susceptible to exposure to extremist ideology and radicalisation. We have a duty to have 'due regard to prevent people from being drawn into terrorism' (Prevent Duty) by educating our learners (appropriate to their age and ability to understand) to recognise and seek help when exposed to risk.

**6.3 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.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual' (Working together to Safeguard Children 2018). Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships

**6.31** 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
- 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.

**6.32 Possible indicators of sexual abuse include:**

- sexually explicit behaviour, play or conversation, inappropriate for the child's age
- parents asking staff not to undress or change their child
- an anxious unwillingness to remove clothes
- continual or inappropriate masturbation
- self-harm, self-mutilation or suicide attempts
- drawings and paintings with a sexual message
- non-accidental bruises and/or scratches around the genital area, buttocks and/or thighs
- bloodstains on underwear
- genital and/or anal pain, infections and/or discharge
- spending time with older children or vulnerable people
- unexplained gifts
- absence from home or school.

**6.4 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **6.41 Possible indicators of neglect include:**

- a parent's failure to meet a child's essential basic needs (e.g. adequate food, clothes, warmth, shelter and medical care and treatment)
- failure to ensure adequate supervision, including the use of inadequate care givers such as children left alone and unsupervised for excessive periods of time or left with intoxicated, violent or inappropriate adults
- absence from school when no signs of illness have been observed or failure to collect from school on a regular basis
- neglect of, or unresponsiveness to, a child's basic emotional needs
- a listless, apathetic and unresponsive child with no apparent reason
- a child who fails to grow within normal expected limits
- a parent's failure to get a child to school or keep necessary health appointments
- a parent's failure or refusal to give their children love and affection, or a consistent lack of love, affection or stimulation.

#### **6.5 Child-on-child Abuse**

Safeguarding issues can manifest themselves in many ways. One such way is through child-on-child abuse. It is important that such abuse is recognised and reported in the same way as any other form of abuse - recognising that both or all the children involved need support and may have significant needs. Whilst the abuser must be held responsible for their actions, their needs must also be considered. It must not be passed off as 'banter' or 'part of growing up'. Children who have experienced or perpetrated child on child abuse will be supported by the staff team or wider services depending on individual circumstances. A risk assessment will be drawn up by the DSL in cases where the alleged perpetrator and victim may come into contact with one another or with others at school. It is important to reassure victims that they are being taken seriously and that they will be supported and kept safe

#### **6.51** Such abuse can take the form of any of the other forms of abuse (see above) plus:

- Bullying (and cyberbullying).
- Hazing (initiation-based violence or abuse).
- Gender based violence/sexual assaults and 'sexting'.

#### **6.6 Upskirting** became a specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the

intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress or alarm. Keeping Children Safe in Education 2025 lists upskirting as one example of child-on-child abuse of which school staff should be aware.

**6.7 Domestic abuse** can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

**6.8 Local context:**

Our school is located in a culturally rich and diverse community in the centre of London and so our families originate from many places around the world. We recognise that children and their families may struggle to convey what has happened in response to questioning and so, other forms of communication may be desirable (such as a child drawing a picture of what has upset them rather than explaining it in words). A translator may be required in some cases, but the sensitivities of the community and the conversation must be considered carefully (including when using translators from agencies). The experiences and expectations of our families differ considerably with respect to child-rearing, but family, financial, cultural or religious grounds can never be accepted as reasons for any kind of maltreatment of a child.

Gangs are known to exist locally, communities among which FGM is carried out inhabit the local area and the risk that our children face from radicalisation is very real. We have a duty to ensure that we protect our children from harm or exposure to it. At St Augustine's we aim to protect our children from harm. We do this by building their resilience, so reducing the risk that they may be harmed (including radicalisation or recruitment into a gang), raising their awareness of their rights, giving them strategies to help themselves and the knowledge of how they can seek help. Neglect is a key concern within Westminster and so, we will ensure that staff are alert to the signs of neglect and take every step to ensure that our children are protected from experiencing the harmful effects of it.

Children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead

## **7. Equality statement**

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender questioning or sexuality

- Are in kinship care, or have a social worker (as recognised in the updated responsibilities of Virtual School Heads)
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 8. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 8.1 All staff

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- Our online safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff should also understand and apply DfE guidance on the use of generative AI, recognising potential safeguarding and misinformation risks.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

## **8.2 The Designated Safeguarding Lead (DSL)**

The DSL is a member of the senior leadership team. Our full-time DSL is Carla Sorbello-Bali. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can also be contacted out of school hours if necessary by email:

Carla Sorbello Bali: [csorbello@stapprimary.org](mailto:csorbello@stapprimary.org)

When the DSL is absent, the deputies – Ruth Vince and Sharon George – will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Take part in online safety training, including filtering and monitoring processes
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

## **8.3 The Governing Body**

The governing body will:

- Receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge. This is so that they can be assured the safeguarding policies and procedures are effective and support your school to deliver a robust whole school approach to safeguarding.
- Make sure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Ensure that the school has appropriate filtering and monitoring systems in place and regularly review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Ensure filtering and monitoring systems account for emerging risks, including those linked to generative AI, misinformation, disinformation and conspiracy theories
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- Ensure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

All governors will read Keeping Children Safe in Education in its entirety.

#### **8.4 The Headteacher (Head of Primary)**

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - i. Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - ii. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Ensure that online safety training is included in staff safeguarding and child protection training
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Ensure the safe use of technology, mobile phones and cameras in the Early Years classrooms

### **9. Information-sharing and confidentiality**

**9.1** All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children. The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Timely information sharing is essential to effective safeguarding and to enable early intervention. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe (see GDPR policy).

**9.2** If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent; it cannot be reasonably expected

that a practitioner gains consent; or if to gain consent would place a child at risk. Sharing information about an allegation will be restricted to those who have a need to know in order to:

- Protect children
- Facilitate enquiries
- Manage disciplinary procedures
- Protect any rights of the alleged perpetrator

**9.3** Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

**9.4** Child Protection information must be sent through a secure electronic system or courier if required. Pupil records should not be sent by post.

**9.5** Confidentiality is also addressed in this policy with respect to record-keeping in section 20, and allegations of abuse against staff in appendix 2.

## **10. Recognising abuse and taking action**

**10.1** Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note, in this and subsequent sections, any references to the DSL should be taken to mean the DSL (or deputy DSL).

### **10.2 If a child is suffering or likely to suffer harm, or in immediate danger**

Make a referral to the Access to Children's Services Team (020 7641 4000

[Access to Childrens Services@westminster.gov.uk](mailto:Access to Childrens Services@westminster.gov.uk)) and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Urgent matters can be defined as any situation in which action is required on that same day to ensure the child's immediate safety and welfare.

You must tell the DSL as soon as possible if you make a referral directly. You must then fill out the relevant section on CPOMS to record what the child has told you.

On CPOMs you must:

- use actual words spoken by the young person rather than an interpretation of what was said
- record accurately specific facts relating to named people, dates, places, times and context of disclosure
- record any injuries observed clearly on the diagram

If a concern arises out of school hours, contact Westminster Social Services duty line: Out of hours – 020 7641 6000.

In an emergency, call 999.

If you have made a referral out of school hours or term time, you must inform the DSL and / or Head of Primary immediately by email or telephone.

If you have concerns regarding the way Child Protection is managed at our school, you should contact the NSPCC Whistle-blowing helpline number - 0800 028 0285. (See Whistleblowing Policy)

### **10.3 If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions or interrupt them
- Stay calm and do not show that you are shocked or upset, or pass judgement
- Reassure the child that they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on to the DSL/Children's Services in order to help keep him/her safe. Do not promise to keep it a secret.
- Write up your conversation as soon as possible on CPOMs in the child's own words and using initials only for all individuals involved. Stick to the facts, and do not put your own judgement on it.
- Pass the CPOMs record on to the DSL. Ensure that you follow up with the DSL in person as soon as possible. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 10.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Never ask the child to remove items of clothing to show you injuries.

### **10.4 If you discover that FGM has taken place or a pupil is at risk of FGM**

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in section 6 and appendix 3 of this policy.

#### **10.4.1 Any teacher who either:**

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures:

- Write up your conversation as soon as possible on CPOMs in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Pass the CPOMs record on to the DSL.

#### **10.5 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

**10.51** Figure 1 below, before section 10.7, illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from Children's Services, Duty and Assessment Team or Out of Hours Team. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Record your actions on CPOMs and share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **10.52 Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Early help indicators can include if a child:

- Has experienced multiple suspensions, or is at risk of being permanently excluded from school
- Has a parent or carer in custody, or is affected by parental offending
- Is frequently missing/goes missing from education, home or care

**If the child is already known to social services** the DSL will make contact with the allocated Social Worker or the named team with responsibility.

The DSL will keep the case under constant review and the school will consider a referral to local Access to Children's Services Team if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### **10.6 Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 10.1), you must tell the DSL as soon as possible.

**10.61** If you have concerns of a possible child protection issue concerning a Westminster child, contact the Access to Children's Services Team (telephone: 020 7641 4000) and ask to speak to a

social worker to discuss a child protection concern. Information on how to report a concern about a child is available on the Westminster website: <https://www.westminster.gov.uk/children-and-family-support>

If a child lives outside Westminster, the referral should be made to the local authority where the child lives. If you are unaware of who to refer to, contact the Westminster Duty and Assessment team who will advise you.

Brent referrals by a professional: <https://www.brent.gov.uk/children-young-people-and-families/keeping-children-safe#Reportchildabuse>

Camden referrals by a professional: <https://www.camden.gov.uk/ccm/navigation/social-care-and-health/safeguarding-children/?page=2#section-2>

The social worker will discuss the information with you and agree a course of action:

- From the information received, the Duty and Assessment Team (DAT) may initiate a child protection enquiry and investigate accordingly. You will be asked to follow up this referral in writing, preferably in the form of a CAF but if this is not possible, then a written account of the information that was disclosed and how the disclosure came about, any action that has been taken subsequent to the disclosure and any additional information you have about the child or their family will be essential
- From the information received, DAT may suggest that the concerns do not warrant immediate action but an assessment is required and you will be asked to complete a written referral in the form of a CAF
- From the information received, it may not be clear if the concerns are of a child protection nature and you may be asked to obtain additional information or clarify information with the family prior to making a referral using the CAF.

If you are using the CAF as a referral into DAT, it can be emailed to the Access to Children's Services Team: [Access to Childrens Services@westminster.gov.uk](mailto:Access to Childrens Services@westminster.gov.uk)

It is essential that you include the following information when you make a referral:

- Name of child
- Date of birth and age
- Family address
- Ethnicity of child
- Main language spoken by child and family,
- Details of who is in the family home and any information you have about them
- Telephone numbers for the family including emergency contact numbers held on school records
- The name of the child's GP
- Details of the concern, allegation or disclosure
- Details of what information you have given to the child and its family
- Details of the involvement with the child and family prior to the concern and since

It is also useful to the Social Worker to include a pen picture of the child which provides information about:

- How the child presents in school with adults and other children
- Whether child is developing as expected or if there are any concerns regarding:

- Any special educational needs the child has
- The physical appearance of the child,
- How the family interact with the school
- Changes that have been noted over the time you have been involved with the child and their family

#### **10.62 What Happens Next**

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

**If the concern is considered to be an immediate child protection concern:**

- DAT will contact the Police Child Abuse and Investigation Team (CAIT) to discuss the information and make a decision about whether it will be a **joint investigation** (between children's services and CAIT) or a **single investigation** (children's services).
- A Section 47 Child Protection enquiry and investigation is triggered and alongside this a Core Assessment will be completed.
- If it is a **joint investigation**, the child will be seen by a social worker and a police officer to talk about the disclosure / injury / cause of concern. This should usually be done with permission from someone with parental responsibility, although the police are able to override this if they feel it's imperative. This should only be the case where the child would be at further risk or more extreme risk through speaking to the parents in advance of speaking to the child. Once the child has been spoken to, the parents will then be spoken to, welfare checks will be completed and a decision made regarding whether the child is suffering or likely to suffer significant harm.
- Where the child presents with an injury, it is common place for a medical examination to be arranged in order for a paediatrician to look at the injury and determine, where possible, if it's consistent with the explanation given. If the child has disclosed sexual abuse, the decision to arrange a medical examination will be made based on the nature of the disclosure, the timing of the abuse and the age and understanding of the child.
- If it is a **single investigation**, the social worker will need to speak to the child, but must first get permission to do this from someone with parental responsibility. The social worker is likely to want to see the child in school in the first instance and will later follow this up with seeing the child at home. Once the child has been seen, the social worker will speak to the parents and undertake welfare checks in order to gather as much information as possible to understand the circumstances for the child and determine if the child is suffering or likely to suffer significant harm.
- If it is considered unsafe for the child to remain in the family, Children's Services will look at ways of keeping the child safe by one of the following alternative courses of action:
  - The perpetrator will be asked to leave the family home;
  - The Social Worker will look to someone within the family to care for the child;
  - Children's Services will seek the agreement of the family for the child to be accommodated with foster carers;
  - If no one with parental responsibility gives permission to accommodate the child then either;

- the police will take out a Police Protection Order or;
- the social worker will seek to obtain a Court Order permitting the local authority to accommodate the child.
- If the child is deemed to be suffering or likely to suffer significant harm and this is considered to be ongoing unless intervention is provided, but it is considered appropriate for the child to remain at home, then a Child Protection Case Conference will be held for multi-agency decision making and planning.
- Where the child has been deemed to suffer significant harm but this is not considered to be ongoing then consideration will be given to what support, if any, the family require.
- If the child has not been deemed to have suffered significant harm then the case is likely to close unless other needs that require support have been identified during the course of the assessment.

**If the concern is not considered to be an immediate Child Protection Issue:**

Children's Services will review the CAF and make a decision regarding whether:

- an Initial Assessment (a snapshot of the child's life) is adequate to assess the needs of the family and identify appropriate support or;
- a Core Assessment (a more in-depth assessment of the family) is necessary.
- If during the course of either assessment it becomes apparent that there are Child Protection concerns then a Section 47 enquiry and investigation can be started.

**When a CAF has been completed but no Child Protection concerns are believed to be present:**

- The CAF will be considered by the CAF co-ordinator who will make a decision regarding the identified needs of the child and their family.
- The case is presented at the weekly Locality Allocation Meeting (LAM) for the agencies in attendance to look at what support they can offer the family. In the case of an older young person, the Youth Inclusion Support Panel (YISP) will consider the young person's circumstances and what support can be offered.
- A lead professional is identified who will co-ordinate the support for the family.
- If the co-ordinator or the panel believe that the case should be assessed by statutory children's services because of possible Child Protection concerns, they will pass it to the Access to Children's Services Team for consideration.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

**10.63 How Children's Services Work Together with Schools**

At all stages of the process the Social Work teams will want to work together with the school. Central to working together is appropriate and timely information sharing.

**The school will be notified of the outcome of any Child Protection referral made within 48 hours.** If this does not happen you should telephone the Access to Children's Services Team to ask for an update.

The Designated Person for Child Protection should ensure that wherever possible the school is represented at meetings or conferences.

There is information about Child Protection conferences at:

<https://www.rbkc.gov.uk/lscp/sites/default/files/atoms/files/CP%20Conference%20Leaflet%20for%20Parents%20-%20Westminster.pdf>

If a child is made subject to a Child Protection Plan a member of staff from the school will be asked to be a member of a core group which will implement the work with the child and family that is included in the Plan. That member of staff should work closely with the child's allocated Social Worker and report any concerns arising in school promptly. The core group member should also keep a record of improvements and strengths that have been noted and report these at the meetings. It is important the school keeps a record of any referral made, and notes of any previous concerns. These and any subsequent correspondence received about the child should be securely filed separately from the child's pupil file and transferred promptly should the child leave your school.

Westminster's Child Protection Advisors (CPAs) are available to offer advice to designated staff in schools about complex issues in relation to particular children and families. They can be contacted for consultation by telephone on **020 7641 7668**. CPAs are not able to accept a child protection referral but will advise and guide you through the agreed process if necessary.

## **10.7 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from the Access to Children's Services Team. Make a referral to the Access to Children's Services Team directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Access to Children's Services Team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

#### **10.8 If you have a mental health concern**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

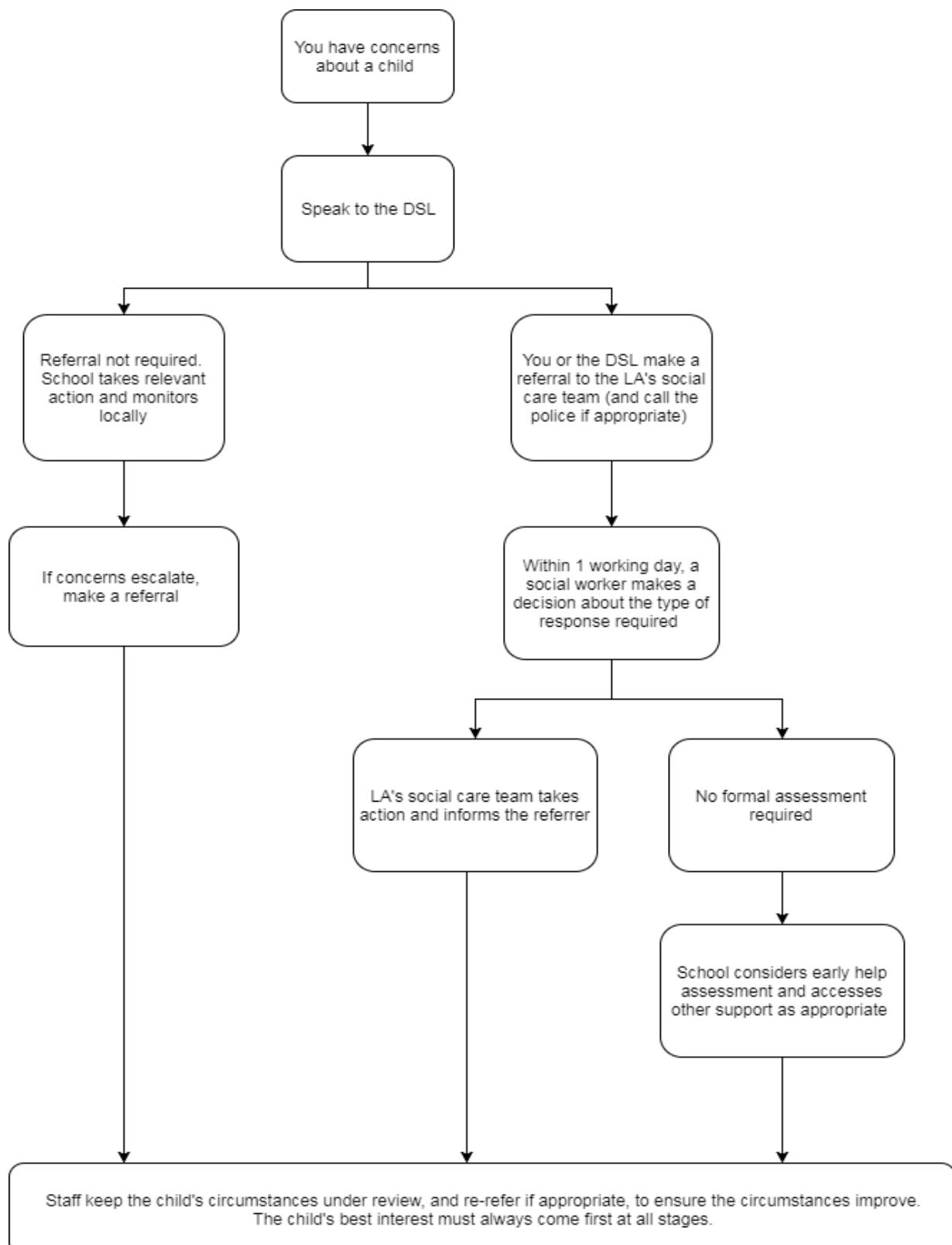
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 10.6.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL/Senior Mental Health Lead to agree a course of action.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## **10.9 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible.

If the school receives an allegation relating to an incident where an individual or organisation has been using the school premises for running an activity for children, you should follow the safeguarding policies and procedures and inform the local authority designated officer (LADO), as you would with any safeguarding allegation.

If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 2 for more detail).

St Augustine's CE Primary School and Maida Vale Children's Centre follows the Westminster LA policy and procedure for managing allegations against staff (see: Allegations Against Staff and Volunteers Policy). These procedures are summarised below and must be followed by all members of staff and volunteers if they receive an allegation, or if they themselves have concerns, about the behaviour of another member of staff/volunteer, either in or out of the workplace, that might indicate that:

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

### **What to do if you receive an allegation against a member of staff/volunteer, or have concerns yourself**

1. Report all concerns immediately to the Named Senior Officer (NSO): Ruth Vince (Head of School) or, in her absence Emily Bettoni or Catrin Cunnington (currently on maternity leave).
2. If you have concerns regarding the way that Child Protection is managed at our school, the NSPCC Whistle-blowing helpline number is: 0800 028 0285.
3. If the allegation is against the Headteacher, report your concerns to the Chair of the Governing Body (John McArdle [john@mcardle.co.uk](mailto:john@mcardle.co.uk)) before the end of the day.
4. The NSO will contact the school's HR representative.

#### **and at least one of the following within one working day:**

- Local Authority Designated Officer (LADO): 020 7641 7668 [lado@westminster.gov.uk](mailto:lado@westminster.gov.uk)  
Initial communications should be via this address and contact number asking for the Duty Child Protection Officer

- Tri-Borough Safer Organisations Manager and LADO for the Tri borough AQUALMA DANIEL, 07870481712 [Aqualma.Daniel@rbkc.gov.uk](mailto:Aqualma.Daniel@rbkc.gov.uk)
- Angela Flahive, Head of Safeguarding, Review & Quality Assurance (RBKC and WCC) | 07739 315 970 | [angela.flahive@rbkc.gov.uk](mailto:angela.flahive@rbkc.gov.uk)
- Elaine Campbell, Bi-borough Safeguarding Lead for Schools & Education Settings | 07712 236 508 | [elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk)
- Emma Biskupski, Local Safeguarding Children Partnership Business Manager(RBKC/WCC) | 07779 348 094 | [emma.biskupski@rbkc.gov.uk](mailto:emma.biskupski@rbkc.gov.uk)  
[www.rbkc.gov.uk/lscp](http://www.rbkc.gov.uk/lscp) @LSCPx2 (twitter)
- Sarah Mangold, Safeguarding Practice Lead | 07590 808 142 | [sarah.mangold@rbkc.gov.uk](mailto:sarah.mangold@rbkc.gov.uk)
- Sally Smith, LADO Manager| [Sally.Smith@rbkc.gov.uk](mailto:Sally.Smith@rbkc.gov.uk)
- **LADO Referrals WCC:** Please call 020 7641 7668 and ask to speak to the Duty LADO / Email: [lado@westminster.gov.uk](mailto:lado@westminster.gov.uk)

5. There may be up to three strands in the consideration of an allegation, which may need to occur simultaneously:

- Consideration by the school/children's centre of staff suspension and possible disciplinary action;
- Enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- A police investigation of a possible criminal offence.

6. Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. They must also be kept well-informed about the progress of the case and told the outcome (not the information taken into account when reaching a decision) where there is not a criminal prosecution. This includes the outcome of any disciplinary processes.

7. The person who is the subject of the allegation will also be kept informed of the progress of the case. Support from the Local Authority (e.g. occupational health) may be offered.

8. The person who is the subject of the allegation should contact their union or professional organisation as soon as possible.

9. Allegations will be resolved as quickly as possible. Every effort will be made to meet the expectations laid out in 'Working Together to Safeguard Children 2018' in which it is stated that 'it is reasonable to expect that 80% of cases should be resolved within one month; 90% within three months and all but the most exceptional cases should be completed within twelve months.'

10. The fact that a person tenders their resignation, or ceases to provide their services, will not prevent an allegation being followed up.

11. So called 'compromise agreements' will not be agreed to in child protection cases.

12. A clear and comprehensive summary of any allegation will be kept, including details of how the allegation was followed up and resolved, any action taken and any decisions reached. The purpose of this record is to enable accurate information to be given in response to any future request for a reference. This record will be retained at least until the person has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer.

## **10.10 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about child-on-child abuse.

## **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Allegations of child-on-child abuse must be recorded on CPOMs and all actions recorded.

Children should be reassured that their concerns are being taken seriously.

## **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 10.12 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

## **10.11 Sharing of nudes and semi-nudes ('sexting')**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident, or shown an image by a pupil, involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately and self-refer to the police explaining that you have viewed the image (even though it was unsolicited).

#### **You must not:**

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
  - The incident involves an adult
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any pupil in the images or videos is under 13
  - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done by the safer schools officer, or dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 20 of this policy also apply to recording these incidents.

## **10.12 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- Have systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

We ensure that all children know that there is an adult in school whom they can approach if they are worried or in difficulty and children are encouraged to speak to a trusted adult if they have any worries or concerns.

Posters showing and naming the DSL and Deputy DSLs are displayed around the school and leaflets about safeguarding at St Augustine's are available in the office reception area.

Pupils are made aware of systems and processes for reporting any concerns and/or allegations through discussions in PSHE/RSE lessons.

## **11. Early Years Foundation Stage**

We recognise that very young children may not be able to communicate what is happening or has happened to them or may not be aware of the boundaries of appropriate behaviour (either their own or that of others). Their disclosures may be unclear and the timeline confused, but concerns should

always be reported following school procedure. All requirements laid down in the EYFS statutory framework 2025 and KCSIE 2025 have been considered in reviewing this policy.

### **11.1 Paediatric first aider**

A member of staff who holds a current paediatric first aid certificate will be on the school premises at all times and will accompany children in the EYFS on school trips (see Healthcare, medicines, first aid and infections policy and Trips and visits policy).

### **11.2 Intimate/Personal care**

We aim to ensure that children's dignity will be preserved and a level of privacy ensured if they require personal care. Staff will always work in an open environment by avoiding private or unobserved situations or closing doors to toilet areas (see Health care, first aid, medicines and infectious diseases policy).

### **11.3 Staffing in the EYFS**

The school will ensure that staff levels within the early years setting comply with statutory guidance, can meet the needs of the children and keep them safe.

For Nursery classes:

- there will be at least one member of staff for every 13 children
- one member of staff will hold a full and relevant level 3 qualification, and the other staff must hold at least a Level 2 qualification

For Reception classes:

- class sizes will be limited to 30 pupils
- during lesson time, classes will be led by a qualified teacher supported by suitably qualified support staff.
- during lunchtimes, there will be a senior mid-day meals supervisor and an additional supervisor in the outdoor learning environment that may be shared with the Year 1 class for some of the time.

## **12. Curriculum**

Our aim is to educate our children to stay safe, recognise situations that carry risk, take considered risks, recognise those they can trust and protect themselves from harm or those who could harm them. We promote the dignity of the person, mutual respect and British values through direct teaching in PSHE, RSE and through our school rules. We ensure that every child has a voice through the School Council and Pupil Questionnaire and by ensuring that they can name an adult that they would trust to help them if they needed it. We teach the children about how they can stay physically and emotionally happy and how their emotions work with their body. We lead assemblies on resilience and provide a range of experiences and opportunities that build resilience. We work with parents in workshop sessions so that they are aware of the differing needs their child has as they grow. We are a 'Trauma Informed' school and our curriculum takes a 'Growth Mindset' approach with regard to resilience, PSHE, RSE and safeguarding education as well as having a programme of residential visits that take all children (who are allowed by their parents to participate) outside their usual environment, providing respite from daily life in the city and challenge within a measured context so

that we equip our children with the skills they need to stay safe from harm and to know to whom they should seek help. For those that senior leaders have identified as likely to benefit, additional pastoral or therapeutic support is available within the school.

### **13. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Parents are made aware of the school policy on the use of images regularly, at the annual Meet the Teacher session and at special events (see Use of photographs and video images policy). All staff are expected to comply with school policy on eSafety (Computing and online safety policy) and the use of images. Children are taught through computing and PSHE/RSE lessons and during assemblies to understand how to stay safe on-line and when using social media.

Children and staff increasingly work online. At school, we have strong firewalls and filters to ensure that children are appropriately safeguarded from potentially harmful and inappropriate online material.

#### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, misinformation, disinformation, conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

**To meet our aims and address the risks above we will:**

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, including filtering and monitoring systems, that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our Computing and online safety policy and Use of mobile phones policy, which you can find on our website.

### **13.1 Artificial intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

St Augustine's recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse

(e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

#### **14. Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority Access to Children's Services Team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

#### **15. Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with special educational needs or disabilities (SEND) or certain health conditions have additional vulnerabilities, including an increased likelihood of isolation and abuse from peers, and can face additional safeguarding challenges. These children may not be able to communicate what is happening or has happened to them, or may not be aware of the boundaries of appropriate behaviour (either their own or that of others). Their disclosures may be unclear and the timeline confused, but concerns should be reported following school procedure.

Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for these pupils. This includes:

All principles, policies and procedures laid down by the school regarding safeguarding, child protection, safer recruitment, staff conduct, health and safety, first aid and personal care, attendance and the use of images apply to children with SEND and are outlined in separate policies and in the SEND section of the school website.

## **16. Pupils with a social worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. In line with KCSIE 2025, the role of the Virtual School Head (VSH) has been clarified to include promoting educational outcomes for children with a social worker and those in kinship care, as well as looked-after children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

## **17. Looked-after and previously looked-after children**

### **17.1 Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, the safeguarding lead Carla Sorbello-Bali, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

### **17.2 Private Fostering**

It is important that the school is aware of any alternative arrangements for a child's care, such as Private Fostering and 'Home Stays'. A Private Fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) with someone other than a parent or close relative (legal step parent, grand parent, adult sibling, uncle or aunt), in their own home, with the intention that it should last for 28 days or more.

It is not private fostering if the arrangement was made by social services. Examples of private fostering situations include:

- children and teenagers living apart from their families for a variety of reasons e.g. if a parent is ill, has had to temporarily move for work or there has been an argument within the family
- children with parents working or studying elsewhere in the UK
- children with parents overseas
- children on holiday exchanges.

## **18. Pupils who are lesbian, gay, bisexual or gender questioning**

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Pastoral support will be offered to these children by the senior mental health and wellbeing lead.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubescent children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## **19. Complaints and concerns about school safeguarding policies**

### **19.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

### **19.2 Whistle-blowing**

Our whistle-blowing policy covers concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures.

## 20. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing using CPOMs. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be uploaded and logged on CPOMs for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When it is necessary to share Child Protection information with other agencies, it must be sent through a secure electronic system or courier if required. Pupil records should not be sent by post.

- Appendix 1 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 21. Training

### 21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety (including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring), to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify learners susceptible to being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, staff meetings and INSET days).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

## **21.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 3 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

## **21.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

## **21.4 Recruitment – interview panels**

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 1 of this policy for more information about our safer recruitment procedures.

## **21.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

# **22. Physical Intervention and Restraint**

Occasionally, it may be necessary to restrain a child to prevent them from harm or to prevent them from hurting others. Physical restraint is applied as an act of care and protection with the intention of re-establishing verbal control (co-regulation) as soon as possible and, at the same time, allowing the

pupil to regain self-control (self-regulation). If this is the case, physical intervention will only be used as a last resort, when all other strategies have failed. The contact used will always be the minimum possible and we will always seek to maintain the dignity of the pupil concerned. It will never be used as a punishment. If it is ever necessary to restrain a pupil, it will always be reported to the Head Teacher, a record will be kept on CPOMS and parents informed.

## **23. Monitoring arrangements**

This policy will be reviewed **annually** by the Head teacher and DSL. At every review, it will be approved by the full governing board.

## **24. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour policy
- Anti-bullying policy
- Staff code of conduct
- Complaints policy
- Health and safety policy
- Attendance policy
- Computing and online safety policy
- Mobile phone use policy
- Equality policy
- PSHE and RSE policy
- Healthcare, medicines, first aid and infections policy
- Curriculum policy
- GDPR policy
- Whistleblowing policy

## **Appendix 1: Safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy
- Only accept copies of curriculum vitae (CV) alongside an application form (a CV on its own won't provide adequate information)

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Involve carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching

- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

#### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the

DBS update service. We will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- We believe the ‘harm test’ is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

## **Appendix 2: Allegations of abuse made against staff**

### **Section 1: Allegations that may meet the harms threshold**

This section is based on ‘Section 1: Allegations that may meet the harms threshold’ in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

The school will follow safeguarding procedures and inform the LADO if there’s an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A ‘case manager’ will lead any investigation. This will be the Headteacher, or the chair of governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school’s personnel adviser and the designated officer at the local authority, as well as the police and children’s social care where they have been involved.

## Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
  - Being overly friendly with children
  - Having favourites
  - Taking photographs of children on their mobile phone
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

## **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

## **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## **Appendix 3: Specific safeguarding issues**

### **Children who are absent from education**

A child who is absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are also victims. Children can be victims, and perpetrators, in their own relationships too. The abuse can be physical, sexual, financial, psychological or emotional.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. See [Operation Encompass](#) for more details.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Learners who are susceptible to radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 10 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat

groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBTQ+) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of children**

If a child is not collected at the end of the school day, we will contact parents/carers to find out the reason and when the child is expected to be collected.

The Administrative Officer will look after the child until 4:00pm. If the child has not been collected by 4:00pm, a member of SLT will look after the child until they are collected.

The name of the child, class, time of collection and reason for late collection will be recorded in the late book. Persistent late collection will be recorded on CPOMs.

The Headteacher and/or DSL will meet with parents/carers who are persistently late in collecting their child to explore reasons and to identify whether any support is required.

#### Appendix 4: Key Contacts

- **City of Westminster Safeguarding in Education website**  
<https://www.westminster.gov.uk/safeguarding-children>
- **Keeping Children Safe in Education (KCSIE 2025)**  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **London Safeguarding Children's Partnership**  
<http://www.londoncp.co.uk/>
- **Local Safeguarding Children's Partnership (Bi-borough)**  
<https://www.rbkc.gov.uk/lscp/>
- **London Diocese Board for Schools (LDBS)**  
<https://www.london.anglican.org/church-and-parish-support/safeguarding/>
- **Statutory Guidance on Promoting the Health and Well-being of Looked After Children**  
<https://www.gov.uk/government/publications/promoting-the-health-and-wellbeing-of-looked-after-children--2>
- **Working Together to Safeguard Children 2023: A guide to inter-agency working to safeguard and promote the welfare of children**  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Multi agency practice guidelines for FGM (2020)**  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912996/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_MASTER\\_V7\\_-\\_FINAL\\_July\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912996/6-1914-HO-Multi_Agency_Statutory_Guidance_on_FGM_-_MASTER_V7_-_FINAL_July_2020.pdf)

- **Government Prevent Guidance**

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

- **Children with Disabilities**

[http://www.londoncp.co.uk/chapters/disabled\\_ch.html](http://www.londoncp.co.uk/chapters/disabled_ch.html)

#### A. CONTACTS IN SAFEGUARDING AND CHILD PROTECTION

- Westminster **DUTY & ASSESSMENT** 020 7641 4000 / out of hours 6000
- Head of Safeguarding, Review & Quality Assurance - **ANGELA FLAHIVE**- 07739 315 970/020 7361 3467 [angela.flahive@rbkc.gov.uk](mailto:angela.flahive@rbkc.gov.uk)

- Safer Organisations Manager & Local Authority Designated Officer - **AQUALMA DANIEL** – 07870481712 [Aqualma.Daniel@rbkc.gov.uk](mailto:Aqualma.Daniel@rbkc.gov.uk)
- Safeguarding and Child Protection Officer - Schools and Education **ELAINE CAMPBELL**, 02073613000/07712236508 [elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk)
- Interim Service Manager for Safeguarding **SARAH MANGOLD**, 020 7598 4440 /07590808142 [Sarah.Mangold@rbkc.gov.uk](mailto:Sarah.Mangold@rbkc.gov.uk)
- Prevent RBKC: Simone Torry, Prevent Education Officer, RBKC & LBHF |07554 222 610| [Simone.Torry@lbhf.gov.uk](mailto:Simone.Torry@lbhf.gov.uk)
- Head of Early Help and YOT, **MADHU CHAUHAN** [mchauhan@westminster.gov.uk](mailto:mchauhan@westminster.gov.uk)
- General Enquiries & Training | [Prevent3@rbkc.gov.uk](mailto:Prevent3@rbkc.gov.uk)
  - Prevent Westminster: Julie Knotts, Prevent Education Officer |07790 980 223| [jknotts@westminster.gov.uk](mailto:jknotts@westminster.gov.uk)
- General Enquiries & Training | [prevent@westminster.gov.uk](mailto:prevent@westminster.gov.uk)

## Appendix 5: General Procedures for The Safe Conduct of Building and Maintenance Works

### Safeguarding statement

All adults working in schools and/or with children have a legal duty and moral responsibility to protect children from abuse and harm (see The Children Acts 1989 and 2004 and The London Child Protection Procedures and Keeping Children safe in Education 2025). At St Augustine's this duty is taken very seriously and we have put in place clear and explicit policies to keep all children safe. Concerns regarding children's welfare and safety will be reported to Westminster's Access to Children's Services Team

### Health and Safety statement

Contractors working on school premises have a legal duty to ensure that their activities/equipment/substances etc. do not cause risks to the health or safety of themselves or others; and the managers of school premises also have a legal duty to ensure that they inform contractors of any risks on the premises that might affect them (e.g. asbestos). Contractors, sub-contractors and specialists working on School premises – whether for day to day repairs, contract servicing, or on major works projects – are required to comply with all relevant health and safety

legislation and HSE guidance, as well as the following rules. (In this document the term 'contractor' is deemed to include sub-contractors.)

1. Contractors and contractor staff must not use the gate code. They must use the buzzer and sign in/out when entering and leaving the school site and must wear approved ID (which may include badges or branded work wear) at all times.
2. Contractors and contractor staff **must avoid contact with children**. Remember that actions kindly meant can be misinterpreted by children themselves and/or by those observing.
3. Contractors must give the site contact, Steve Delaney (Site Manager), reasonable advance notice regarding:
  - prior arrangements for parking on site (rarely possible)
  - prior arrangements for deliveries that could affect staff, parents' or pupils' safety
  - prior notice of work commencement, scale and possible disruption
  - date / time of proposed visit / works commencement
4. Prior to work commencing the Site Manager or School Admin Officer will provide the Contractor with information on fire and emergency evacuation arrangements for the school e.g. information on the location of asbestos containing materials and any other information about premises risks that may affect the Contractor.
5. The Contractor must report to the Site Manager /Head Teacher:
  - any suspected asbestos area not indicated on the Asbestos Register (such asbestos not to be disturbed or removed)
  - all accidents / near miss-incidents, no matter how minor
  - all planned changes to programme or location
  - any possible disruption of services
6. Contractors are responsible for:
  - posting notices to inform staff, students and the public of works being undertaken, as an aid to their safety.
  - the provision of all necessary protection of floor/wall/door surfaces against damage through works – including the provision of dust sheets etc.
  - the provision of their own First Aid facilities
  - removing all rubbish/debris
  - testing all works on completion as necessary and supplying the Head Teacher with commissioning/test data
7. The following activities are banned on school premises: -
  - smoking
  - alcohol brought on to, or consumed on, school premises
  - illegal substances being brought onto, or consumed on, school premises
  - the playing of radios/music etc. at a volume loud enough to be heard outside the working area
  - shouting, swearing, over-familiarity with staff, parents or visitors
  - working alone and in isolation unless adequate safety arrangements are provided by the contractor and approved by the school.

8. Appropriate clothing must be worn at all times including shirts and the wearing/use of adequate personal protective clothing/equipment.
9. Contractors must not enter non-work areas without prior permission from the Site Manager or Headteacher.
10. Contractors must use only the toilets allocated to them and must never enter toilet areas or use WCs that are available to children.
11. Contractors will be required to:
  - provide a copy of their Health & Safety policy
  - comply with all relevant Health & Safety legislation
  - provide written risk assessments/method statements before work commences.
  - work in a safe manner so as not to endanger themselves, pupils, staff or the public
  - work behind substantial physical barriers/closed doors, with appropriate warning signs, at all times unless agreed otherwise with the Head Teacher
  - ensure that no products containing asbestos or CFCs are used on school premises
  - be aware of and comply with the school's fire and emergency evacuation procedures
  - take all necessary measures (e.g., covering/sealing sensors) to ensure that work does not cause the accidental activation of the school's fire alarm
  - avoid obstructing any means of escape or interfering with fire doors. Fire doors must not be propped or wedged open. Blocking of corridors/staircases or other fire escape routes may take place only after agreement by the Head Teacher
  - evacuate buildings at the sound of fire alarm, report their safe evacuation to the Head Teacher/person in charge and go to nominated assembly area(s)
  - adequately control physical/chemical hazards to prevent risks to school staff, pupils and visitors (e.g. trailing leads, storage of tools, solvent fumes, absence of lighting or fire alarm etc.)
  - keep noise and dust to a minimum
  - get prior agreement to break through fire compartments and make good any damage, e.g. when running electrical/data cabling or pipework.
  - Only the Site Manager, the Head Teacher or her nominee has authority to require Contractors to stop work.