

# Safeguarding (Child Protection) Policy 2023

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## Acronyms and Definitions

There are a number of acronyms and definitions that are specific to safeguarding, this page acts as a quick reference guide

CAIT	Child Abuse Investigation Team
CAF	Common Assessment Framework
CAFCASS	Children and Family Court Advisory and Support Service
CAMHS	Child and Adolescent Mental Health Services
CEOP	Child Exploitation and On-line Protection Centre
CRB	Criminal Records Bureau
CYPP	Children and Young Peoples Plan
DASH	Domestic, abuse, stalking and harassment and honour-based violence
DCS	Director of Children's Services
DfE	Department for Education
DO	Designated Officer (formerly known as the LADO)
DPA	Data Protection Act
EPO	Emergency Protection Order
EYFS	Early Years Foundation Stage
FGC	Family Group Conference
FGM	Female Genital Mutilation
FII	Fabricated and induced illness
GDRP	General Data Protection Regulation
GP	General Practitioner
ICT	Information and Communication Technology
IRO	Independent Reviewing Officer
ISA	Independent Safeguarding Authority
LA	Local Authority
LSCB	Local Safeguarding Children Board
MARAC	Multi-agency Risk Assessment Conference
MPS	Metropolitan Police Service
OFSTED	Office for Standards in Education, Children's Services and Skills
PSA	Parenting Support Advisor
PSHE	Personal Social and Health Education
SEN	Special Educational Needs
TAC	Team around the child
UKHTC	UK Human Trafficking Centre
VBS	Vetting and Barring Scheme

## Introduction and Aims

The Gipsy Hill Federation of schools are committed to providing a safe and secure environment for children, staff and visitors and also promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them 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; and taking action to enable all children to have the best outcomes. At the Gipsy Hill Federation, we ensure that safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development. We operate with the best interests of the child at heart.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone at The Gipsy Hill Federation who comes into contact with children, their families and carers has a particularly important role to play in safeguarding children. We recognise that staff are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. In order to fulfil this responsibility effectively, all staff at the Gipsy Hill Federation should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. It is also recognised that sometimes children will not feel ready or know how to tell someone they are abused, exploited, or neglected, and they may not know if their experiences are harmful.

Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

We recognise that no single professional can have a full picture of a child's needs and circumstances. We recognise that, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

'Child protection' refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

'Staff' refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

'Child' includes everyone under the age of 18.

**The aims of this policy are to:** Prevent, Protect and Support

- Identify the names of responsible persons in the school and explain the purpose of their role.
- Outline the role of the governing body.
- Raise all members of staff's awareness of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school.
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable".
- Clarify how children will be kept safe through the everyday life of the school.
- Monitor children known to be at risk of harm.
- Set out expectations in respect of training.
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff.
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g., volunteers, contractors etc.
- Outline how complaints against staff will be handled.
- Set out expectations regarding record keeping.
- Support a culture of safeguarding, building resilience and a collective responsibility for the safety and well-being of others.
- Work constructively with partner agencies to ensure timely and appropriate support for vulnerable children and their families.
- Ensure that key concepts of child protection are integrated within the curriculum and pupils are educated about risks.
- Raise awareness of child protection issues amongst staff, parents and pupils and to describe clearly the procedures that have been adopted to identify and support children at risk and to respond to concerns and disclosures.
- Clarify how children will be kept safe through the everyday life of the school.
- Outline how the implementation of this policy will be monitored.

The Gipsy Hill Federation's Child Protection (CP) policy draws upon duties set out in the Children Acts 1989 and 2004, The Children and Families Act 2014, s.175 of the 2002 Education Act (as amended), The Education (Independent School Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools), the Apprenticeships, Skills, Children and Learning Act 2009 (as amended), the Education and Training (Welfare of Children) Act 2021 and the guidance contained in [Working Together to Safeguard Children](#), the DfE's statutory guidance [Keeping Children Safe in Education](#), Ofsted Guidance, and procedures produced by the London Safeguarding Children Partnership (LSCP) and the relevant local Safeguarding Children Partnerships (LSCP/SSCP). We also have regard to the advice contained in DfE's [What to do if you're worried a child is being abused](#) and [Information Sharing – Advice for practitioners](#). The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the school.

We will ensure that those staff who work directly with children read at least Part One, and those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One), of the DfE guidance [Keeping Children Safe in Education](#). This will depend on the assessment of which guidance will be most effective for the staff to safeguard and promote the welfare of children. We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One (or Annex A if appropriate) of the guidance.

This policy is consistent with all other policies adopted by the Federation and should be read in conjunction with the following policies relevant to the safety and welfare of children: Acceptable Use of Technology, Attendance, Health and Safety, Special Educational Needs, Behaviour (Adults & Children), Complaints Procedure, Equalities, Preventing Extremism & Radicalisation, E-Safety (and Acceptable Use), Anti-bullying, Educational Visits, Positive Handling, Recruitment and Selection and Whistleblowing.

## Responsibilities and Immediate Action

Safeguarding children in our schools is the responsibility of the whole school community. Safeguarding incidents can happen anywhere and staff should be alert to possible concerns being raised in school.

All adults working in the Gipsy Hill Federation (including visiting staff, supply teachers, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect (see Appendix 4 on types of abuse) to the Designated Safeguarding Lead (DSL) with responsibility for Child Protection (see Appendix 1-3 for detailed guidance on responding to disclosures) or to a Deputy Designated Safeguarding Lead (DDSL).

To ensure that staff in each school will always have immediate access to a trained Designated Safeguarding Lead (DSL) who is a member of the school leadership team, we have established a Safeguarding Team, which is detailed in Appendix 1. Annex B of the DfE Guidance, [Keeping Children Safe in Education](#), describes the broad areas of responsibility and activities related to the role.

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The team of DSLs also take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identify the impact that these issues might be having on children's attendance, engagement and achievement. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.

The DSL, who is a member of the school's leadership team, takes lead responsibility for safeguarding and child protection (including online safety), working with mental health leads where safeguarding concerns are linked to mental health. The DSL provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children. The DSL has a significant level of responsibility and our governing body will provide the DSL additional time, funding, training, resources, and support needed to carry out the role effectively. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL - this lead responsibility should not be delegated. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

The DSL and DDSLs will liaise with the three safeguarding partners (local authority, clinical commissioning group and the chief police officer of the area) and work with other agencies in line with 'Working Together to Safeguard Children' and 'NPCC – When to call the police'.

All staff are encouraged to report concerns and not to see these as insignificant. Occasionally, reporting a single incident, such as an injury or disclosure of abuse, is justified. More often, however, problems accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns immediately, to allow the DSL to build up a picture and access support for the child at the earliest opportunity. Reliance on memory, without accurate and contemporaneous records of concern, could lead to a failure to protect.

It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise problems and inform the DSL of the information outlined in this policy.

The DSL should be the first point of contact for concerns and queries regarding safeguarding concerns in our school. Any staff member or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to a DDSL. In the absence of either of the above, the matter should be brought to the attention of the most senior staff member.

All concerns about a child or young person should be reported without delay and recorded by the DSL or DDSL in writing on the *safeguardmyschool* system, including:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved (this will usually be completed by the DSL)
- a note of any action taken, decisions reached and the outcome (this will usually be completed by the DSL).

Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Lambeth Integrated Referral Hub / Southwark Multi-Agency Safeguarding Hub as required. All information and activities taken, including the reasons for any decisions made, will be fully documented. Where there is any doubt as to the seriousness of the concern, or disagreement between the DSL and the member of staff reporting the concern, advice will be sought from a DDSL or the Local Authority's strategic lead officer for Safeguarding in Education Services.

If there is a risk of immediate serious harm to a child, a referral should be made directly and immediately to the Local Authority. Anybody can make a referral in these circumstances. If the child's situation does not appear to improve, the staff member with concerns should press for re-consideration by raising concerns with the DSL and Headteacher.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services or the police if:

- the situation is an emergency, and the designated senior person, their alternate and the Headteacher are all unavailable.

- they are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and by the procedures outlined in this policy should raise their concerns with the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

All our staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider taking advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible. In the case of an investigation or assessment, the DSL is the first point of contact for external agencies and coordinates school representation at Child Protection Conferences and Core Group meetings (including the submission of written reports for conferences).

DSLs and DDSLs will also be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - Police and Criminal Evidence Act \(PACE\) Code C 2019](#).

## Referrals

Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

The Local Safeguarding Partnership Multi Agency Threshold Guide sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by local agencies.



Referrals should be made to the relevant Local Authority (see Appendix 1/2 for detailed guidance on making a referral) via the appropriate referral form. Prior to any written referral being sent to social care, there should be an informal consultation with a duty social worker or manager by calling the duty desk; this is to ensure that making a referral is an appropriate action. The parents/carers will normally be contacted to inform them that a referral is being made. However, if the concern involves: alleged or suspected child sexual abuse; Honour Based Abuse; fabricated or induced illness; or the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral. In this case a rationale for the decision to progress without consent from the parent should be provided with the referral.

When we make a referral, the local authority should make a decision within one working day of a referral being made, about the type of response that is required and should let us, as the referrer, know the outcome. We will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

Referrals to Early Help using the appropriate referral forms will be made to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services.

Where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk, for example, because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, urgent police intervention will be requested.**

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported to the Local Authority for investigation.

All parents applying for places at the Gipsy Hill Federation schools will be informed of our safeguarding responsibilities and the existence of this policy and it is available on the Gipsy Hill Federation website. Where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the Gipsy Hill Federation, parents will be notified of this as soon as possible according to the first aid procedure.

The Gipsy Hill Federation recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or when pupils are travelling to and from school, and will take all reasonable steps to lessen such risks through the use of the curriculum and sharing information with the police and other partner agencies.

## Vulnerable Pupils/Children

Particular vigilance will be exercised in respect of pupils who are subject to a Child Protection / Child in Need Plan and any incidents or concerns involving these children. Any unexplained absence will be reported immediately to the allocated Social Worker and confirmed in writing. (For Southwark Schools only, this will also be copied to the LA's Schools Safeguarding Coordinator.) If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care.

Local authorities should share with our school the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety,

welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs and/or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#). Where appropriate we provide additional pastoral support for pupils with SEND and also ensure appropriate communication support is in place, for example, ensuring a trusted adult is present if they make a disclosure.

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue.

The Gipsy Hill Federation acknowledges the additional need for support and protection of children, particularly very young children, who are vulnerable by virtue of disability, homelessness, refugee/asylum seeker status or the effects of substance abuse within the family, who are young carers, mid-year admissions, excluded from school and for whom English is an additional language.

The law requires that the relevant local authority is notified of private fostering arrangements. Any privately fostered children that come to our attention, i.e., children under the age of 16 (under 18 if disabled), who are cared for by someone who is not their parent or a close relative for 28 days or more, will be referred to Children's Services. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

A person who is barred from regulated activity will themselves be committing an offence under the Children Act 1989 and under the Safeguarding Vulnerable Groups Act 2006 if they privately foster a child.

## Looked-After Children/Previously Looked-After Children/Children with Social Workers

The most common reason for children becoming looked-after is as a result of abuse and/or neglect. Our governing board will ensure that staff have the skills, knowledge and understanding necessary to keep looked-after children safe.

We will ensure that appropriate staff have the information they need in relation to a child's looked-after legal status (whether they are looked-after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

The school's Designated Teacher for looked-after and previously looked-after children will work with the person known as the 'virtual school head', who manages pupil premium plus for looked-after children, to discuss how funding can be best used to support the progress of looked-after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked-after children. We note the DfE's guidance [Designated teacher for looked-after and previously looked-after children](#). Where a child has an allocated social worker, we will liaise with the virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note the DfE's non-statutory guidance on [promoting the education of children with a social worker](#) that contains further information on the roles and responsibilities of virtual school heads.

At the Gipsy Hill Federation, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean they are more vulnerable and face educational barriers to attendance, learning, behaviour, and poor mental health. We consider these needs planning support for these pupils, for example when considering in-class support or appropriate interventions.

## Children Missing Education

Missing school can indicate abuse and/or neglect and may raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We refer to the DfE's guidance [Working Together To Improve School Attendance](#). Where a pupil is known to social care, we will work in close partnership with the social worker in relation to any concerns regarding attendance.

We will always follow up with parents/carers when pupils are not at school. This means we require at least two up-to-date contact numbers for parents/carers. Parents must update the school as soon as possible if their numbers change.

At the Gipsy Hill Federation, we ensure we have:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards), or
  - e. are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take their place will be referred to the local authority.

When a pupil leaves the school, we will record their new school's name and expected start date.

At the Gipsy Hill Federation, all staff are aware of the safeguarding responsibilities for children who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

We adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are missing:

- An attendance register is taken at the start of the first session of each school day and once during the second session at the start of the afternoon.
- We make every effort to contact parents and carers and follow up with emergency contacts on the first day of a child's absence.
- We hold at least two emergency contact numbers for each pupil on our roll wherever possible.
- Staff will alert DSLs to any concerns regarding children absent from school.
- The DSLs will meet regularly to ensure that each response is thorough and considers all the relevant information about individual children who are missing from education and/or are persistently absent. The school uses a range of responses as appropriate to ensure every child is attending school regularly – for example, attendance panel meetings, home visits, referrals and joint working with the Education Welfare service.
- We will follow the procedures outlined in our attendance policy, including undertaking first-day calling and monitoring data to ensure we intervene early in cases of poor attendance or unexplained absences.
- When removing a child from the roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.

## Training

Training for all staff members on safeguarding and child protection issues (including online safety) will be provided at induction and will be updated on a regular basis. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47, as well as the remit of the role of the DSL. The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive on-line safety training as this is part of the overarching safeguarding approach of our school.

In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All newly recruited staff (teaching and non-teaching) and governors will be appraised of this policy and will be required to attend relevant training. In addition, all new staff and temporary staff will be required to attend an induction session with the DSL or their deputy on their first day in the school.

As part of their induction, all staff must read and understand the Safeguarding (Child Protection) policy, the Behaviour policy, and the Staff Code of Conduct. They will receive induction training that include the role of the DSL, the safeguarding response to children who go missing from education and all key aspects of the safeguarding policy.

All visitors to our school are informed on their arrival to the school of the DSLs and how to report a concern, along with the request to read the safeguarding notice. All regular visitors, temporary staff and volunteers will receive an induction regarding safeguarding procedures.

The DSL (and their deputies) will undertake appropriate dedicated training for DSLs and then refresher training at least every two years. The DSL will also undertake Prevent awareness training and will be able to understand the unique risks associated with online safety. In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other DSLs or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated staff will be encouraged to attend appropriate network meetings and to participate in the [multi-agency training programme](#) organised by the relevant Safeguarding Children Partnerships (LSCP and SSCP).

## Safer Recruitment

### Recruitment

The Gypsy Hill Federation is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, identify and/or reject people who might abuse children. Safe recruitment processes are followed and all staff recruited to the school will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part Three of the DfE guidance, [Keeping Children Safe in Education](#). We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare, [Disqualification under the Childcare Act 2006](#), which also contains information about 'disqualification by association'.

Where there is a valid reason for retaining a copy of the DBS certificate, we will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.

Relevant members of staff and governors who are involved in recruitment will undertake safer recruitment training. The school will ensure that at least one person on any appointment panel has undertaken safer recruitment training in line with staffing regulations.

We will carry out an online search to help identify any incidents or issues that are publicly available online. This will be carried out in line with the process set out by the Local Authority. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

The Gypsy Hill Federation will only use employment agencies that can demonstrate that they have positively vetted their supply staff, and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff joining the Gypsy Hill Federation on a permanent or temporary basis will be given a copy this policy.

### Volunteers

Any parent or other person/organisation engaged by the school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and criminal records checks.

Under no circumstances will a volunteer for whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Volunteers who regularly teach or look after children on an unsupervised basis, or who provide unsupervised personal care on a one-off basis, in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we reserve the right to request a repeat DBS check (which will include barred list information).

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain DBS certificate for volunteers who are not in regulated activity and who are supervised regularly on an ongoing day-to-day basis by a person who is in regulated activity. However, an enhanced DBS check, with or without a barred list check, may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part Three of the DfE guidance, [Keeping Children Safe in Education](#).

Volunteers will be subject to the same code of conduct as paid employees of the school.

Voluntary sector groups that operate within our schools or provide off-site services for our pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the relevant Safeguarding Children Partnership. Premises lettings and loans are subject to acceptance of this requirement. Where services or activities are provided separately by another body, we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## Safer Working Practices

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect to their contact with pupils and their families. All adults who meet our children have a duty of care to safeguard and promote their welfare. We have a legal obligation to ensure that all adults who work with or on behalf of our children are competent, confident, and safe. All staff will receive a copy of the staff Code of Conduct on induction. They will be expected to know and adhere to the Code of Conduct as well as the Behaviour and Positive Handling policies.

The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour - which are set out in the staff Code of Conduct - are constantly lived, monitored and reinforced by all staff.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour and Positive Handling policies. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance [Use of reasonable force in schools](#).

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will have an Individual Healthcare Plan that has been agreed with the parents and relevant health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations, for example during musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open or allow full external visibility. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.

School staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating pupils (*see below about what a 'low-level' concern is and how to share these concerns*).

School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Headteacher. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Headteacher. Where there is a potential conflict of interest (for example a pre-existing friendship with a parent of a pupil or a family relationship to a pupil in the school), the Headteacher will be alerted to this immediately and agreement will be reached as to how to manage this to safeguard all involved. Staff supervising off-site activities or school journeys will be provided with a school mobile phone as a point of contact for parents and carers.

Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Headteacher. Staff will only use the approved school email, school learning platform or other school-approved communication systems with pupils or parents/carers, only communicate with them on appropriate school business, and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission, from the headteacher and appropriate consents in place from parents and will not store images at home.

Staff should be aware of the school's whistleblowing procedures and share immediately with the Headteacher (or one of the DSLs if the Headteacher is not available) any disclosure or concern that relates to a member of staff. Nothing should be said to the colleague involved. It should be shared with the Chair of Governors if it relates to the Headteacher.

A whistleblowing disclosure covers a reasonable concern about any of the following types of wrongdoing :

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged



- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government. The number is 0808 800 5000.

We note the non-statutory [Guidance for Safer Working Practice for professionals working in education settings](#) published by the [Safer Recruitment Consortium](#).

## Contractors

Building contractors who are engaged by or on behalf of the Federation to undertake works on site will be made aware of this policy and the reasons for it. Contractors who work regularly in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Senior Leadership Team deem this to be appropriate.

During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions. All contractors and sub-contractors will be issued with copies of the school's Code of Conduct for staff.

Individuals and organisations that are contracted by the Gipsy Hill Federation to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any organisation using any school site for any purpose (lettings, holiday clubs etc.) will also be expected to adhere fully to this policy and their compliance will be monitored and are included in the requirements as set out below, including in relation to informing the Local Authority Designated Officer, where appropriate, of any concerns.

Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is regularly carrying out teaching or providing some type of care for or supervision of children). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances will we allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. We will determine the appropriate level of supervision, depending on the circumstances. If an individual working at our school is self-employed, we will consider obtaining the DBS check ourselves, as self-employed people are not able to make an application directly to the DBS on their own account.

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

## Safeguarding Concerns and Allegations Made About Staff, Including Supply Teachers, Volunteers and Contractors

At the Gipsy Hill Federation, we recognise that adults working in the school, including governors, volunteers, supply teachers and agency staff, may harm children. We take seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Headteacher (or one of the DSLs if the



Headteacher is not available). Nothing should be said to the adult involved. In cases where the Headteacher is the subject of the allegation or concern, they will be reported to the Executive Headteacher and Chair of Governors, in order that they may activate the appropriate procedures. If the Executive Headteacher is the subject of the allegation or concern, they will be reported to the Chair of Governors. The contact details for the Chair (or Co-Chairs) of Governors can be found in Appendix 1 below or they can be contacted via the school office.

Concerns may come from various sources, for example, a suspicion, complaint or disclosure made by a child, parent, or another adult within or outside the organisation; or because vetting checks are undertaken.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as ‘low level concerns’.

The Headteacher must decide whether the concern is an allegation of the first type or a low-level concern. The Headteacher should seek advice from the Local Authority Designated Office (LADO) as appropriate.

### **Allegations that may meet the harms threshold**

The following procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school, including supply teachers, volunteers and contractors. It applies where it is alleged that any person working in the school has or may have:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm if they work regularly or closely with children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, which includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

All allegations about staff members should be reported immediately to the Headteacher (or one of the DSLs if the Headteacher is not available) and nothing should be said to the adult involved. The Headteacher will in turn inform the Executive Headteacher and Human Resources as appropriate. If the allegation concerns the Headteacher, then the Executive Headteacher and Chair of Governors should be informed directly and without delay and without informing the Headteacher. In cases where the Executive Headteacher is the subject of the allegation or concern, they should be reported to the Chair of Governors (contact details are contained in Appendix 1), in order that they may activate the appropriate procedures.

Whenever an allegation comes to the school’s attention and appears to meet the above criteria the Local Authority Designated Officer (LADO) will be informed without delay. Under no circumstances will the Gipsy Hill Federation carry out any investigation or take any action until the LADO has been consulted. The exception to this will be if the nature of the concern is so serious that it requires immediate intervention by the police. In these circumstances the LADO will also be involved immediately. In line with advice from the LADO, basic enquiries in line with local procedures to establish the facts to help determine any foundation for the allegation (being careful not to jeopardise any future police investigation) will be carried out to inform the referral. The LADO’s role is not to

investigate the allegation but to ensure that an appropriate investigation is carried out, whether by the police, children's social care, the school, or a combination of these.

Contact can also be made with the LA's Safeguarding Coordinator/Manager who will liaise with the LADO.

Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, a referral will be made to children's social care and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London SCP procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

The Gipsy Hill Federation has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults, or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

### **Concerns and/or allegations that do not meet the harms threshold – known as 'low level concerns'**

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work, which does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

Example behaviours include, but are not limited to:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on their mobile phones
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- Using inappropriate sexualised, intimidating or offensive language.

All 'low-level' concerns will be brought immediately to the attention of the Headteacher (or one of the DSLs if the Headteacher is not available) and nothing will be said to the adult involved. In cases where the Headteacher is the subject of the concern, they will be reported to the Executive Head Teacher and Chair of Governors. If the Executive Headteacher is the subject of the concern, they will be reported to the Chair of Governors.

When matters have been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual(s) involved and any witnesses.

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

Staff are encouraged and should feel confident to self-refer where, for example, they have found themselves in a situation that could be misinterpreted and appear compromising to others or if, on reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- Name of individual sharing their concerns (if the individual would like to remain anonymous, then that should be respected as far as reasonably possible)
- Details of the concern
- Context in which the concern arose
- Action taken.

Records will be kept confidential and held securely in line with the Data Protection Act 2018 and will be retained on the member of staff's personnel file. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.

Where records identify broader cultural issues within the school, policies and processes will be reviewed and revised and additional training will also be delivered to minimise future risks.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance [Keeping Children Safe in Education](#).

**Note:** Staff, parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers/staff whilst investigations are ongoing.

**What's the difference between an allegation and a complaint?** Complaints are generally expressions of dissatisfaction or concern that may relate to the delivery of a service by a team or individual. A complaint may also be an expression of dissatisfaction about procedures or policy or the way procedures and policies are implemented by any team, team member or our organisation. Gipsy Hill Federation has a separate Complaints policy and all such complaints should be addressed following that policy. Where there is no indication that the complaint relates to harm or potential harm to a child there is no need to refer to the Designated Officer.

**The Chair of Governors is: *Alex Cambouris/Charles Asher***

**The Vice-chair is: *Europe Singh***

***EACH SCHOOL TO INCLUDE LOCAL ADVISORY BOARD CHAIR***

***They can be contacted via the school office or using the contact details in Appendix 1.***

## Records

Brief and accurate written notes will be kept of all incidents and child protection or child in need concerns, discussions and decisions made, and the reasons for those decisions, relating to individual pupils. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged and these will be kept as child protection

("CP") records. The school will take into account the views and wishes of the child who is the subject of the concern, but staff will be alert to the dangers of colluding with dangerous "secrets".

CP records are not open to pupils or parents. All CP records are kept securely by the DSL and separately from educational records. They may only be accessed by the DSL, their Deputies and the senior managers of the school.

The content of Child Protection Conference or Review reports prepared by the school will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carer in advance of the meeting.

CP records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the school, as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of the new term, ensuring secure transmission. A confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any other information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

When we receive CP records from other schools, we will ensure key staff such as the DSL and SENDCo are aware as required.

If a pupil is withdrawn from the school having not reached the normal date of transfer, due to a family move or any other reason, all efforts will be made to identify any new address and the school to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the appropriate LA service in order that they might make further enquiries. If this school receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. A child's name will only be removed from the School's Admissions Register in accordance with the [Pupil Registration Regulations](#) or with the authorisation of the Local Authority.

We will inform the Local Authority when we are about to add or delete a pupil's name from the school admission register for any reason in line with [Children Missing Education \(CME\) Protocol](#).

All additions to or deletions from the school roll will trigger the completion of a Common Transfer File (CTF), which will be downloaded to the appropriate database via the DfE's secure internet system called *school2school* with particular regard to pupils leaving the school with unknown destination.

We will upload CTFs of pupils who have left but whose destination or next school is unknown, or who have moved abroad or transferred to a non-maintained school, to a searchable area of the *school2school* website commonly referred to as the 'Lost Pupil Database' using the appropriate destination code. Given that schools cannot search the Lost Pupils Database, if a pupil arrives in our school and we do not know the previous school, we will contact the LA, who will be able to search the database for a matching record using gender, names or former names and date of birth, and forward it to our school. The school will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. We will hold more than one emergency contact number for each pupil to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

File description	Retention Period	Action at end of administrative life of record
Child protection files	Date of birth + 25 years	Secure disposal
Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Secure disposal

CP records will be kept if there is no known destination. The school will also ensure they have notified the CME Lead for their LA / lost pupils so that, if the pupil is located, the records can be linked up.

## Information sharing and confidentiality

The Gipsy Hill Federation will ensure that there are arrangements in place setting out processes for sharing information with the three safeguarding partners, other organisations, agencies and practitioners. Timely information sharing is essential to effective safeguarding.

The Gipsy Hill Federation will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes allowing relevant staff to share information without consent where there is good reason to do so and the sharing of information will enhance the safeguarding of a child in a timely manner, or where to gain consent would place the child at risk.

The Gipsy Hill Federation will not provide information where the serious harm test is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation.

If the child is under 12, consent to share information about them (if required) must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and over are able to give their own consent.

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 interest.

All staff will have due regard to the government's [information sharing advice for safeguarding practitioners](#) which includes 7 'golden rules' for sharing information.

## Safety in the School

No internal doors to classrooms will be locked whilst pupils are present in these areas.

Entry to school premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. The Headteacher will use their professional judgement about the need to escort or supervise visitors, such as children's relatives or other visitors attending a sports day. In the case of individuals visiting the school in a professional capacity e.g., educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They will be logged in and out of the premises and will be asked to wear their identity badges or be issued with school visitor badges. Unidentified visitors will be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.

Staff and visitors are expected to wear their identity or visitor badges at all times whilst they are on site.

The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if the Police stop these individuals, they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to the LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

Parents, carers or relatives may only take still or video photographic images of pupils in school or on school-organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

## The Curriculum

The Gipsy Hill Federation acknowledges the important role of the curriculum in the prevention of abuse and in the preparation of our pupils for the responsibilities of citizenship and adult life. We will ensure that children are taught about safeguarding, including online safety, and will consider this as part of providing a broad and balanced curriculum. It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting effective safeguarding outcomes (welfare and safety of pupils/children). As appropriate, the curriculum will be used to build resilience, help pupils to keep themselves safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kinds of physical contact are acceptable and unacceptable;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being, including knowing when and where to get help;
- to be aware of sexual harassment, online abuse, sexual violence and issues of consent and safeguarding risks, including online risks and what constitutes a healthy relationship, both online and offline via a carefully planned relationships, sex and health education curriculum;
- to use assertiveness techniques to resist unhelpful pressure;
- emotional literacy;
- citizenship and how to advise friends about whom they might be concerned;
- to stay safe on-line and on the telephone.

Where necessary we will work with external agencies to support this work.

All computer equipment and internet access within the Gipsy Hill Federation will be subject to appropriate parental controls, acceptable use and Internet safety rules in line with our Acceptable Use of Technology policy. We will be careful that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

We are committed to a whole-school approach to promote the physical and mental well-being and safety of all our pupils. This includes a focus on:

- Developing a school ethos, culture and environment as well as provision for spiritual, moral, social and cultural (SMSC) education that encourages a healthy lifestyle for all children and young people, including disadvantaged and vulnerable pupils;

- Using the full capacity and flexibility of the curriculum to help pupils to be safe and healthy;
- Ensuring that food and drink available across the school day reinforce the healthy lifestyle message;
- Delivering the mandatory Relationships & Sex Education (RSE) and Health Education (HE) and/or, where delivered, Personal, Social, Health and Economic (PSHE) & Wellbeing Education – including specifically consent, sexual harassment and sexual violence, including online in an age-appropriate way;
- Providing high quality Physical Education (PE) and sport to promote physical activity;
- Promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing and mental health;
- Working in partnerships with parents/carers, local communities, external agencies and volunteers to support health and wellbeing of all pupils including the most vulnerable and disadvantaged.

## On-Line Safety

The use of technology and social media has become a significant component of safeguarding children. Technology can provide a platform that facilitates harm such as Child Sexual Exploitation; radicalisation; sexual grooming.

At the Gipsy Hill Federation, all staff 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. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life.

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) 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

### 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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- › **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer 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're a witness rather than a victim
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and 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 restrictions placed on them with regards to the use of their mobile phone and cameras:
  - 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, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- › Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy.

Please note that when taking photos of children, staff use school devices that uploads photos onto a shared area that can be viewed by a range of staff.

### **Remote education**

We understand the importance of keeping pupils and staff safe whilst pupils are learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online. We also note the DfE guidance [Safeguarding and remote education](#).



## Working in Partnership with Parents

At the Gipsy Hill Federation, we are committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new pupils join our school, parents and carers will be informed that we have a Safeguarding policy. A copy will be provided to parents on request and be available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact social care.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to social care in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the other adult's full details in writing.

The schools at the Gipsy Hill Federation are working in partnership with Lambeth and Southwark Met Police and Lambeth and Southwark Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Lambeth and Southwark Multi-Agency Safeguarding Hub will share with the DSLs police information of all domestic incidents where one of our pupils has been present. On receipt of any information, the DSL will decide on the appropriate support the child requires, whether silent or overt. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

## The Role of the Governing Body

The Governing Body will ensure that the safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with Local Authority guidance and the requirements of the Lambeth and Southwark Children Partnership policies and procedures. They will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. Although our Governing Body takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who champions safeguarding across our schools.

The Governing Body will also ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated. The Governing Body will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at [Human Rights | Equality and Human Rights Commission](#) and [Equality Act 2010: advice for schools](#).

The Governing Body will ensure that the school contributes to inter-agency working in line with statutory guidance, [Working Together to Safeguard Children](#), and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by their Local Safeguarding Children Partnership (LSCP/SSCP).

The Governing Body will ensure that a senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained to deal with any issues in the absence of the DSL. There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.

The Governing Body will ensure that all staff receive a safeguarding induction and are provided with a copy of this policy, the staff Code of Conduct, the Behaviour policy and the school's safeguarding response for those pupils who go missing from education. They will ensure that all staff undertake appropriate child protection training and that this is updated annually and that staff also access online safety training. They will ensure that procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance. They will ensure that safer recruitment practices are followed as per the requirements outlined in the up-to-date version of [Keeping Children Safe In Education](#). They will ensure that they work with the school leadership to remedy without delay any weakness regarding our safeguarding arrangements brought to their attention.

The Governing Body has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the DSL, named governor, or the Headteacher/Executive Headteacher.

The Governing Body has nominated Jon Talton to take leadership responsibility for the school's safeguarding arrangements.

Concerns about or allegations of abuse made against the Executive Headteacher or Headteacher will be referred to the Chair of Governors (and, in the case of concerns or allegations about the Headteacher, the Executive Headteacher) who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such allegation.

As a good practice, the Headteacher will provide a termly report to the Local Advisory Board of the Governing Body outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name. These reports will also include information regarding any training that has taken place and any special training requirements for the school.

Also, as a good practice, the nominated governor and/or a member of the Local Advisory Board will meet on a regular basis with the DSL to monitor the school's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school is meeting its duties in respect of safeguarding. The Local Advisory Board (or a nominated member of it) will liaise

regularly with the main Governing Body's named safeguarding lead for the same purposes, at both the individual school and wider Federation levels.

## Monitoring and Evaluation

The governing body will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- The extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level.
- The content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes.
- The quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting.
- The timeliness of response to any safeguarding concerns that are raised.
- The quality of work to support multi-agency plans around the child.

## Complaints

All complaints arising from the operation of this policy will be considered under the school's complaint procedure, with reference to the LA's Strategic Lead Officer for Safeguarding in Education Services as necessary.

Where staff feel unable to raise an issue arising from the operation of this policy or feel that their concern is not being addressed, they must follow the whistle blowing procedures.

## Appendix 1

### Your Designated Safeguarding Team

Federation Governors	Clerk: Sarah Cooper Chair of Governors Contact: <a href="mailto:acambouris@ghf.london">acambouris@ghf.london</a> / <a href="mailto:cashier@ghf.london">cashier@ghf.london</a>
Ms Alexandra Cambouris	Co-Chair of Governors
Mr Charles Asher	Co-Chair of Governors
Mr Jon Talton	Lead Governor for Safeguarding

Federation Safeguarding Leads	0208 670 3576
Mr Duncan Kanya	Executive Headteacher

Kingswood Primary School	0208 761 4827 (Lower Site) / 020 8670 3576 (Upper Site)
Ms Kelly Foster (DSL)	Headteacher
Ms Katharine Wilmot (DDSL)	Deputy Headteacher
Ms Michelle Spencer-Child (DDSL)	Deputy Headteacher
Ms Jan Shahjahan (DDSL)	Deputy Headteacher
Ms Ella Buckton (DDSL)	Assistant Headteacher / Designated Mental Health Lead
Ms Imelda Callaghan (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Ms Ria Mason (DDSL)	Family Services Officer
Ms Corrina Scarlett (DDSL)	Family Services Officer

Elm Wood Primary	☎0208 670 1621
Ms Jo Leith (DSL)	Headteacher
Ms Sarah Gee (DDSL)	Deputy Headteacher/Designated Mental Health Lead
Ms May Chapman (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Ms Becky Jones (DDSL)	Assistant Headteacher
Ms Felix Morgan (DDSL)	Family Services Officer

Paxton Primary	☎0208 670 2935
Mr Jeff Muhammad (DSL)	Headteacher
Ms Graziella Williams (DDSL)	Deputy Headteacher
Ms Laura Talbot-Ponsonby (DDSL)	Deputy Headteacher/Designated Mental Health Lead
Mr Tao Tucker-Samuels (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Ms Carol Wilson (DDSL)	Assistant Headteacher
Ms Melat Mesfin (DDSL)	Family Services Officer

Glenbrook Primary	☎0208 674 2387
Ms Jane Scarsbrook (DSL)	Headteacher
Ms Debbie Palache (DDSL)	Deputy Headteacher/Designated Mental Health Lead
Ms Shirley Pearson (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Ms Corrina Scarlett (DDSL)	Family Services Officer

Fenstanton Primary	☎0208 674 3311
Ms Gillian Roberts (DSL)	Headteacher / Designated Mental Health Lead
Ms Laura Woodham (DDSL)	Deputy Headteacher

Ms Zoe Nash (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Mr Danny Walsh (DDSL)	Assistant Headteacher
Ms Cherie Alleyne (DDSL)	Family Services Officer

<b>Crawford Primary</b>	<b>☎0207 274 1046</b>
Ms Vicky Shires (DSL)	Acting Headteacher
Ms Emma Taylor-Jones (DDSL)	Deputy Headteacher/Designated Mental Health Lead
Ms Louise Williams (DDSL)	Assistant Headteacher (SENCO)/Designated Teacher for Looked After Children
Ms Rachel Flint (DDSL)	Assistant Headteacher
Ms Terri Broughton (DDSL)	Assistant Headteacher
Ms Karima El Hajoui (DDSL)	Family Services Officer

### Local Authority Contacts

#### Lambeth Children's Services

Lambeth Integrated Referral Hub	Duty Manager	020 7926 3100 <b>Out Of Hours:</b> 020 7926 1000 <a href="mailto:helpandprotection@lambeth.gov.uk">helpandprotection@lambeth.gov.uk</a>
Local Authority Designated Officer (DO)	Andrew Zachariades	020 7926 4679 07720 828 700 <a href="mailto:LADO@lambeth.gcsx.gov.uk">LADO@lambeth.gcsx.gov.uk</a>
Senior Safeguarding Manager (Early Years, Primary schools, High schools and colleges)	Deborah Carter	07596 955299 <a href="mailto:dcarter@lambeth.gov.uk">dcarter@lambeth.gov.uk</a>
Education Prevent Officer	Lydia Nixon	020 7926 3668 <a href="mailto:lnixon@lambeth.gov.uk">lnixon@lambeth.gov.uk</a>
Head of Inclusion, Education and Learning	Stuart Boffin	020 7926 0296 <a href="mailto:sboffin@lambeth.gov.uk">sboffin@lambeth.gov.uk</a>
Child Sexual Exploitation Co-ordinator	Claire McDonald	020 7926 0296 CMcDonald@lambeth.gov.uk

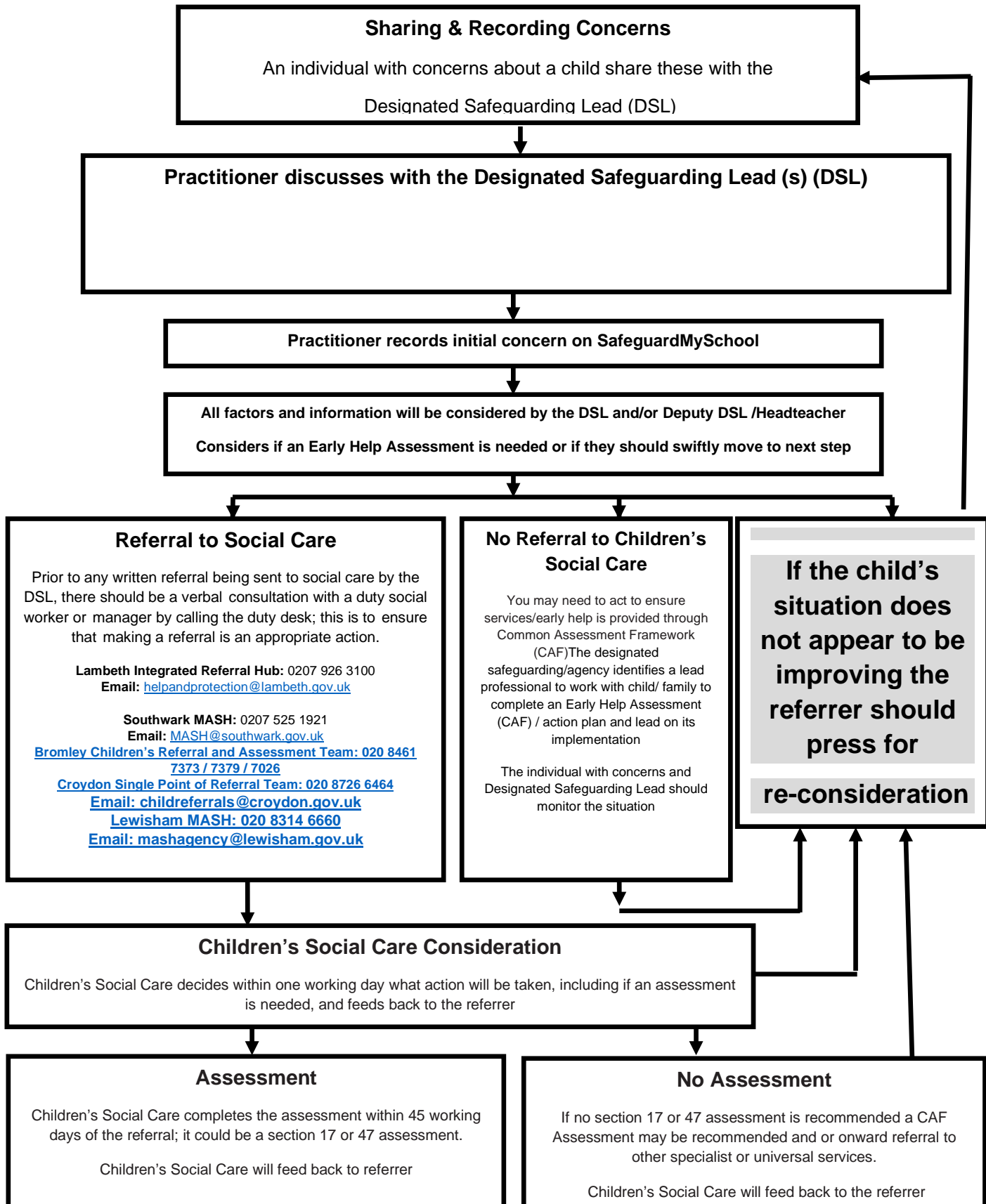
#### Southwark Children's Services

Southwark Multi Agency Safeguarding Hub ( <a href="#">MASH</a> )	Duty Manager	020 7525 1921 <b>Out Of Hours:</b> 020 7525 5000 <a href="mailto:MASH@southwark.gov.uk">MASH@southwark.gov.uk</a>
Family Early Help Service	Duty Manager Duty Officer	020 7525 3893 020 7525 2714 <a href="mailto:earlyhelp@southwark.gov.uk">earlyhelp@southwark.gov.uk</a>
Director of Education/ Strategic Lead Officer for Safeguarding in Education	Nina Dohel	020 7525 3252

Local Authority Designated Officer (DO)	Eva Simcock Duty Officer	020 7525 0689 020 7525 3297
The LA's Schools Safeguarding Coordinator	Apo Çağırca	020 7525 2715
Education Prevent Officer	Charlotte Kathe	020 7525 4185

## Appendix 2

### WHAT TO DO IF YOU HAVE CONCERNS ABOUT A CHILD



## Appendix 3

### Responding to Child Protection Concerns or Disclosures

1. Always stop and pay attention to someone who wants to raise concerns about an incident or the welfare of others.
2. Stay calm, listen carefully and take what you're being told seriously.
3. Always assume that a child is telling the truth.
4. Do not promise secrecy but re-assure any child that they have done nothing wrong and that you will only talk to someone who can help to protect them from further harm.
5. Let the child talk at their own pace.
6. Do not ask leading questions, for example; "What did she do next?" (This assumes that she did), or "Did he touch your private parts?" In cases where criminal proceedings occur, such questioning can cause evidence to become invalid.
7. Do not ask the child to repeat the incident for other members of school staff. The child may have to talk to a social worker and/or a police office and repeat information. Repeating their story unnecessarily can cause undue stress.
8. End by summarising what has been said, tell the child what you are going to do next.
9. Make a note of what the child has said as soon as possible, using their own words. Everyone should make a record of what they have seen and been told, and record any visible injuries.
10. Act quickly and speak to the Designated Safeguarding Lead / Team and report a concern on *SafeguardMySchool* with details of the concern.
11. Be discreet and say nothing that might compromise the safety of the child, their family, a colleague or the integrity of the school.
12. The Designated Safeguarding Lead / Team will then decide upon the next steps and contacting parents / carers and the investigating agencies, as appropriate.
13. Report any concern relating the conduct of staff or visitors to the Headteacher.
14. Report any concerns relating to the conduct of the Headteacher to the Executive Headteacher and Chair of Governors.
15. Report any concerns relating to the conduct of the Executive Headteacher to the Chair of Governors.



## Appendix 4

### Types of Abuse and Neglect

**Children who may require early help:** All Staff (including Contractors, Governors and Volunteers) working within the School should be alert to the potential need for early help, and should consider following the procedures identified for initiating early help using the Local Authority Thresholds Document, for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is a privately fostered child;
- Has returned home to their family from care;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is showing signs of displaying behaviour or views that are considered to be extreme;
- Is not attending school or are at risk of exclusion from school;
- Has a family member in prison, or is affected by parental offending; or
- Is at risk of modern slavery, trafficking, exploitation, or being radicalised;

These children are therefore more vulnerable; the school will identify who their vulnerable children are, ensuring all Staff and Volunteers know the processes to secure advice, help and support where needed.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. They may be abused by an adult or adults or another child or children.

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

Physical Abuse Indicators	
Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> <li>• Unexplained injuries – bruises / abrasions / lacerations.</li> <li>• The account of the accident may be vague or may vary from one telling to another.</li> <li>• Unexplained burns.</li> <li>• Regular occurrence of unexplained injuries.</li> <li>• Injuries other than on parts of the body where the skin passes over a bony protrusion (where most accidental injuries occur).</li> </ul>	<ul style="list-style-type: none"> <li>• Withdrawn or aggressive behavioural extremes.</li> <li>• Uncomfortable with physical contact.</li> <li>• Seems afraid to go home.</li> <li>• Complains of soreness or moves uncomfortably.</li> <li>• Wears clothing inappropriate for the weather, in order to cover body.</li> <li>• The interaction between the child and his/her parent/carer.</li> </ul>

**Emotional abuse:**

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

Emotional Abuse Indicators	
Other indicators for concern	Behavioural indicators
<ul style="list-style-type: none"> <li>• Unexplained insecure, avoidant or disorganised style of attachment</li> <li>• Unresponsive / neglectful behaviour towards the child’s emotional needs.</li> <li>• Persistent negative comments about the child.</li> <li>• Inappropriate or inconsistent expectations.</li> <li>• Self-harm.</li> </ul>	<ul style="list-style-type: none"> <li>• Low self-esteem.</li> <li>• Unhappiness, anxiety.</li> <li>• Withdrawn, insecure.</li> <li>• Attention seeking.</li> <li>• Passive or aggressive behavioural extremes.</li> </ul>

**Sexual abuse:**

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

Sexual Abuse Indicators	
Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> <li>• Sign of blood / discharge on the child's underclothing.</li> <li>• Awkwardness in walking / sitting.</li> <li>• Pain or itching – genital area.</li> <li>• Bruising, scratching, bites on the inner thighs / external genitalia.</li> <li>• Self-harm.</li> <li>• Eating disorders.</li> <li>• Enuresis / encopresis.</li> <li>• Sudden weight loss or gain.</li> </ul>	<ul style="list-style-type: none"> <li>• Sexually proactive behaviour or knowledge that is incompatible with the child's age &amp; understanding.</li> <li>• Drawings and/or written work that is sexually explicit.</li> <li>• Self-harm / Suicide attempts.</li> <li>• Running away.</li> <li>• Substance abuse.</li> <li>• Significant devaluing of self.</li> <li>• Loss of concentration.</li> </ul>

**Neglect:**

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

Neglect Indicators	
Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> <li>• Unattended medical need.</li> <li>• Underweight or obesity.</li> <li>• Recurrent infection.</li> <li>• Unkempt dirty appearance.</li> <li>• Smelly.</li> <li>• Inadequate / unwashed clothes.</li> <li>• Consistent lack of supervision.</li> <li>• Consistent hunger.</li> <li>• Inappropriately dressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Poor social relationships.</li> <li>• Indiscriminate friendliness.</li> <li>• Poor concentration.</li> <li>• Low self-esteem.</li> <li>• Regularly displays fatigue or lethargic.</li> <li>• Frequently falls asleep in class.</li> <li>• Frequent unexplained absences.</li> </ul>

## **Extra-Familial Harm**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside of the school environment. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. All staff, but especially the DSL and DDSs will be considering whether children are at risk of abuse or exploitation in situations outside their families. This is known as Contextual Safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that could increase their vulnerability to risk or are a threat to their safety and/or welfare.

These may include if a child:

- Is disabled or has specific additional needs
- Has special education needs (whether they have a statutory education, health and care plan or not)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned to their family from care
- Is showing early signs of abuse and neglect
- Is at risk of being radicalised or exploited
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Has a family member in prison or is affected by parental offending
- Is persistently absent from education, including persistent absences for part of the school day.

In addition to these types of abuse and neglect, members of staff will also be alert to the specific safeguarding issues outlined below.

### **Specific Safeguarding Issues**

#### **Mental Health**

We are aware that 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral

procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#). The name of the school's Designated Mental Health Lead is detailed in Appendix 1.

### **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims for concerns of this nature](#).

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any 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 victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **Child Sexual Exploitation (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. It occurs when 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 (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. Child sexual exploitation does not always involve physical contact, it can also occur using technology.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. We understand that some children may not realise that they are being exploited e.g., they may believe they are in a genuine romantic relationship. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour; evidence of/suspicions of physical or sexual assault; concerning use of the internet or other social media; increasing secretiveness around behaviours.

We recognise that some children and young people have vulnerabilities that increase the risk of child sexual exploitation, although of course it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

Potential vulnerabilities include:

- Having a prior experience of neglect and physical and sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in: [Child sexual exploitation: Definition and a guide for practitioners \(DfE 2017\)](#)

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

**Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. For the purposes of this policy, "sharing nudes and semi-nudes" covers incidents where

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- A person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When an incident of sharing nudes and semi-nudes comes to a member of staff's attention, it will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. We also note the DfE's [Searching Screening and Confiscation Advice for schools](#).

### **Serious crime or violence**

All staff will be made aware of indicators that may signal that children are at risk from, or are involved with, serious crime or violence. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; or have their bank accounts used to facilitate drug dealing.

## **Child on child abuse**

Children are capable of abusing other children. This can happen both inside and outside of school and online and take different forms, such as: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children; physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), which may include an online element that facilitates, threatens and/or encourages physical abuse; violence, particularly pre-planned; forcing other children to use drugs or alcohol (initiation/hazing type violence and rituals); emotional abuse (blackmail or extortion, threats and intimidation); sexual violence, such as rape, assault by penetration; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery); sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting); sexual exploitation (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, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm (upskirting is now a criminal offence). Although it is more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

The school has a strong commitment to its Anti-Bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's Behaviour policy. As a school, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. It is important that all our staff recognise the indicators and signs of child-on-child abuse and how to identify it and respond to reports. Any possible child on child abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Preventing and Tackling Bullying](#).

## **Sexual harassment, online sexual abuse and sexual violence**

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence can be happening in and around the school, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective Behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent in an age-appropriate way. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online



and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of the DfE guidance, [\*Keeping Children Safe in Education\*](#). All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and children who are LGBT). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to social care and reporting to the Police. We will keep comprehensive records of all allegations.

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

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in line with 'Part 5: Child on child sexual violence and sexual harassment' of the DfE guidance, [\*Keeping Children Safe in Education\*](#), and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to children's social care and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and/or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and, where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

### **Harmful sexual behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a

child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

### **Children who are lesbian, gay, bi, or trans (LGBT)**

We note that the fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

### **Domestic Violence / Abuse**

Domestic or Family Violence/Abuse adversely affects children, whether or not it is significant enough to warrant action under Child Protection procedures. Domestic violence/abuse is classed as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse (physiological, physical, sexual, financial or emotional) between those aged 16 or over who are 'personally connected'. People are 'personally connected' when they have been married to each other or civil partners; or have agreed to marry or become civil partners; have been intimate partners with each other; have shared parental responsibility for the same child; or are family members—all regardless of gender or sexuality. 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, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. When a member of staff becomes aware that a child may be living in a household where there is emotional, physical or sexual violence, we will create an opportunity for the abused partner to disclose harm, and attempt to find out whether the abused partner is receiving help. We will ensure that all information is dealt with securely and sensitively and refer the matter to children's social care where there is a child (or children) at risk of significant harm and/or neglect. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Information about domestic abuse and how to get help in

Southwark can be found [here](#). Information about domestic abuse and how to get help in Lambeth can be found [here](#). Lambeth Council's support and service provider, The Gaia Centre (run by Refuge) (020 7733 8724, [lambethvawg@refuge.org.uk](mailto:lambethvawg@refuge.org.uk)), offers free and confidential support for girls and women over 13 and men over 16 who are experiencing/have experienced domestic abuse. Support is also available to young people aged 11 or over who have witnessed or experienced domestic violence. The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

We note that the definition of harm was amended in the Adoption & Children Act 2002 to include impairment suffered from seeing or hearing the ill treatment of another, particularly in the home, even though they themselves have not been directly assaulted or abused.

### *Operation Encompass*

At the Gipsy Hill Federation, we are working in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass.

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

Encompass has been created to highlight this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment. Further information is available via [Operation Encompass](#).

In order to achieve this, the Multi-Agency Safeguarding Hub (MASH) will share police information of all domestic incidents where one of our pupils has been present, with the DSL. On receipt of any information, the DSL will decide on the appropriate support the child requires, which may be covert dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with the Metropolitan Police and MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

### **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women or girls including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#) and [Lambeth's VAWG Strategy](#).

*So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)*

HBA includes incidents or crimes which have been committed to protect or defend the (supposed) honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

*Female genital mutilation (FGM):*

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, the occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

**FGM is illegal in the UK.**

FGM typically occurs between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elders from the country of origin
- being taken on an extended holiday to the country of origin or other 'at-risk' country
- talk about a 'special' procedure to become a woman

Indicators that FGM might be going to take place:

FGM may be likely if there is a visiting female elder, there is talk of a particular procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an 'at-

risk' country (especially before the summer holidays), or parent wants to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting, or standing and may even look uncomfortable.
- spending more extended than usual normal in the bathroom or toilet due to difficulties urinating.
- spending long periods away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- reluctance to undergo regular medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

We note the duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions, to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e., those where physical signs are observed or it is disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "*Mandatory Reporting of Female Genital Mutilation – procedural information*". A useful summary of the FGM mandatory reporting duty is available in *FGM Fact Sheet*.

If staff have any concerns regarding the possibility of this at any level, they must follow the Gipsy Hill Federation's safeguarding procedures in order that the designated people for child protection and safeguarding can then use the existing national and local protocols for multi-agency liaison with police and children's social care. **Teachers and all staff working in schools have a duty to report cases to the police where they discover that an act of FGM appears to have been carried out.** Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such issues with the safeguarding lead and children's social care.

#### **Forced Marriage:**

Forcing a person into a 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). We note some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 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 [fmufco.gov.uk](mailto:fmufco.gov.uk)
- › Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

We note The Forced Marriage Unit's statutory guidance [The right to choose: government guidance on forced marriage](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities.

### **Preventing Extremism and Radicalisation:**

Protecting children from the risk of radicalisation is part of the Gipsy Hill Federation's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation, and the indicators that might suggest that an individual might be vulnerable, include the following:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another

group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g., IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised *Prevent duty guidance: for England and Wales*, especially paragraphs 57-76.

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Local Authority Children's Services. They will share the details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the multi-agency information sharing system and parallel to this the Prevent police officer will carry out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. At the Gipsy Hill Federation, we are committed to ensuring that our pupils are offered a broad and balanced curriculum to prepare them for life in modern Britain.

### **Fabricated or Induced Illness (FII)**

Fabricated or Induced Illness (FII)/Munchausen's by proxy is a form of child abuse whereby a parent or carer (usually a biological mother) exaggerates or deliberately causes symptoms of illness in the child. The term FII is preferred because it places emphasis on the person carrying out the abuse, rather than the victim. FII covers a range of cases and behaviours involving parents seeking healthcare for a child, from extreme neglect (failing to seek medical care) to induced illness.

Symptoms of FII include:

- A mother or carer who convinces their child they are ill when they are perfectly healthy.
- A mother or other carer who exaggerates or lies about their child's symptoms.

- A mother or other carer who manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples.
- A mother or other carer who deliberately incudes symptoms of illness – for example, by poisoning the child with unnecessary medication or other substances.

Where there are concerns that FII is occurring, the DSL should be notified immediately.

### **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before the arrangement starts. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect or involved in trafficking, child sexual exploitation or modern-day slavery.

If we become aware of a child in a private fostering arrangement within Southwark or Lambeth we will notify the council's Multi Agency Safeguarding Hub (MASH). Information about whether there is a need to notify the council can be obtained in Southwark by calling 07539 346808 or sending an email to [privatefosteringadvice@southwark.gov.uk](mailto:privatefosteringadvice@southwark.gov.uk) or in Lambeth by calling 020 7926 7081.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the child's family to ensure they know their duty to inform the LA. The school itself must report private fostering arrangements to the local authority.

On admission to the school, we will take steps to verify the adults' relationship to the pupil being registered.

### **Children Missing from Education (CME)**

A child going missing from education is a potential indicator of abuse or neglect. We will follow the Gipsy Hill Federation's procedures for unauthorised absence, 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 the future.

It is essential that staff are alert to signs to look out for and individual triggers to be aware of, when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and Forced Marriage.

The school will inform their local authority of any pupil who is going to be removed from the admission register where the pupil:



- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g., home education;
- has ceased to attend school and no longer lives within reasonable distance of the school;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.

This is so that local authorities can fulfil their duty to identify children of compulsory school age who are missing education and follow up any child who might be in danger of not receiving an education and/or who might be at risk of abuse or neglect.

The Gipsy Hill Federation will inform the local authority of any pupil who fails to attend school regularly, or has been absent without permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

If there are concerns about a child in this area, the DSL will consider a referral to the [Cyber Choices programme](#). It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.