

## Safeguarding Policy (including Child Protection) September 2024

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This document covers all pupils from age 3 – 19 years across the Junior and Senior School including the Early Years Foundation Stage (EYFS).

# Safeguarding (Including Child Protection) Policy and Procedures

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## 1. Introduction to Safeguarding and Child Protection

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In developing this policy, the School has had due regard to:

- [Keeping Children Safe in Education 2024](#) (KCSIE September 2024)
- [Disqualification under the Childcare Act 2006 \(August 2018\)](#)
- <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales> *The Prevent Duty Guidance: for England and Wales (April 2023)*
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism \(2023\)](#)
- [Working together to safeguard children 2023](#)
- [National Minimum Standards for boarding Schools \(2022\)](#)
- [Sexting in schools and colleges \(UK Council for Child Internet Safety\)](#)
- [Sharing nudes and semi-nudes: advice for educational settings working with children and young people](#)
- [The Independent School Standards: Guidance for independent schools \(April 2019\)](#)
- [Safeguarding and Protection people for charities and trustees 2023](#)
- [Teaching about relationships, sex and health -RSHE 2021](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)
- [Relationship and Sex Education 2021](#)

### Definition of Safeguarding for Purposes of This Policy

The definition of safeguarding is:

Safeguarding and promoting the welfare of children is defined 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.

Taken from Keeping Children Safe in Education 2024 (KCSIE 2024)

### Statement

Royal Russell Schools understand that safeguarding is everybody's responsibility and is committed to the health, safety and well-being (both physical and emotional) of all children in its care. The School will deploy stringent and active measures to safeguard these aims to provide a safe environment in which the pupils can develop in line with evolving governmental guidance and statutory obligations. All staff (including School Leadership Team) have an equal responsibility to act in accordance with this policy and associated procedures and Keeping Children Safe in Education 2024 (KCSIE 2024)

Child Protection is part of safeguarding. It is any activity undertaken to protect specific children who are suffering or at risk of suffering significant harm. A child is anyone under the age of 18 and in the case of this School, we treat all pupils as children, including those over 18. All staff have a responsibility, at all times, to safeguard our pupils and need to have the attitude that

**'It Could Happen Here'**. All staff in our School take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

Staff should be aware of the need for a **child-centred approach**. This means that they should consider what is in the best interests of the child. No single professional can have a full picture of a child's needs and circumstances. 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.

Any member of staff must make a referral if they believe a child is at risk of significant harm and in need of support services. Key contacts are listed within this document.

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Staff Recruitment Policy.

The School will work with other agencies, wherever such work is needed, to ensure adequate arrangements to identify assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with the [Croydon Children Safeguarding Partnership](#), the police, health and other services to promote the welfare of children and to protect them from harm.

Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a Section 17 or a Section 47 assessment. In addition, the School will comply with any request to supply information to the Safeguarding Partner and Child Death Review Partner that it requires in order for it to perform its functions.

The School recognises the need to differentiate between safeguarding children who have suffered or who are likely to suffer harm and those in need of additional support from one or more agencies. The former is recognised as needing to be referred to social services immediately and the latter should lead to Early Help Pathways Intervention.

## **Aims**

Our aim is to keep every child and young person in our care safe and healthy. To provide an environment in which they are able to learn, grow and develop. We want them to enjoy and achieve in our community, make a positive contribution and attain economic well-being. We believe that all children have the right to protection from neglect and abuse. Our Safeguarding Policy meets the needs of our pupils within our community with particular issues relating to us.

- The School encourages pupils and staff to speak out with assurances that each situation will be taken very seriously without fear of retribution
- To be vigilant in looking for signs of abuse and harm, and be readily available to listen to pupils who feel they have been subjected to these
- To raise the awareness of all teaching and support staff of the need to safeguard children and of their responsibilities, in identifying and reporting possible cases of abuse
- To provide details of a systematic means of monitoring children, known or thought to be at risk of harm, and to provide means of necessary support
- To provide a structured procedure within the School which will be followed by all members of the School community
- To ensure that all members of the adult community with access to children are suitably trained and checked and know the steps to follow to avoid being accused of improper or unprofessional conduct
- To teach pupils about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

## 2. Royal Russell Safeguarding Team (RRST)



### YOUR SAFEGUARDING TEAM 2024-2025



**MS S WARD**  
Deputy Head Pastoral - Senior School  
Designated Safeguarding Lead



**MRS S PAIN**  
Deputy Head Pastoral - Junior School  
Designated Safeguarding Lead



**MR E HUTCHINSON**  
Head of Pastoral Care  
Deputy Designated Safeguarding Lead  
Senior School



**MRS H SCHENK**  
Lead Nurse  
Deputy Designated Safeguarding Lead  
Whole School



**MS S WOOD**  
Teacher of Chemistry and Wellbeing  
Deputy Designated Safeguarding Lead  
Senior School



## SAFEGUARDING TEAM

THE BELOW NAMED DESIGNATED SAFEGUARDING LEAD AND DEPUTIES ARE RESPONSIBLE FOR MONITORING ALL SUSPECTED CASES OF ABUSE AND REFERRING WHERE NECESSARY TO THE RELEVANT BODY. IF YOU HAVE ANY CONCERNS WHATSOEVER ABOUT A CHILD'S SAFETY HERE AT ST DAVID'S SCHOOL, PLEASE DO CONTACT THE TEAM ON EITHER THE SCHOOL OFFICE NUMBER OR BY EMAIL.



MRS S SYRADD  
HEADTEACHER  
DESIGNATED  
SAFEGUARDING LEAD (DSL)



MRS C HADDAD  
HEAD OF EARLY  
YEARS  
DEPUTY DSL



MRS J MITCHELL  
SENDCO  
ASSISTANT HEAD  
DEPUTY DSL



MRS B LEE  
OFFICE AND  
SAFEGUARDING  
ADMINISTRATOR  
DEPUTY DSL

TEL: 020 8660 0723 EMAIL: [DSL@STDAVIDSSCHOOL.CO.UK](mailto:DSL@STDAVIDSSCHOOL.CO.UK)

SOCIAL SERVICES OUT OF HOURS EMERGENCY TEAM: 020 8726 6400

**In addition, all members of the School Leadership Team (SLT) (Heads, and Deputies) receive training to the same level.**

### **3. The Role of the Designated Safeguarding Lead**

The Designated Safeguarding Lead (DSL) carries ultimate responsibility for safeguarding and child protection as well as online safety.

It is apparent from the procedures outlined throughout this policy that great reliance is placed upon all staff sharing information, referring their concerns to the DSLs and follow the School Safeguarding policy. Information sharing is vital to good safeguarding.

The DSLs and their Deputies (DDSLs) should have a complete safeguarding picture and are identified as the most appropriate staff members to advise on the School's response to safeguarding concerns and to lead on early help considerations.

In the absence of the DSLs, any DDSLS has equivalent status to a member of the SLT with regard to safeguarding matters.

**Please see Annex 8** for the details of the Role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.



#### 4. The Role of the Governing Board/Heads

- The Chair of Governors, in liaison with the Heads and Designated Safeguarding Leads (DSLs), will ensure that the School has a safeguarding policy in place, which is in accordance with Croydon Safeguarding Children Partnership agreed procedures, and that these are known to all members of staff.
- The Governing Board will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- The Governing Board reviews and ratifies the Safeguarding Policy annually and is responsible for its implementation. The Chair of Governors, in liaison with the Heads, will ensure that the Safeguarding Policy and Procedures, and the efficiency with which the related duties have been discharged, are reviewed annually through the Governors' Education and Welfare Committee in September. The Annual Safeguarding Report is discussed and approved by the full Governing Board in December and recorded in the minutes of the meeting.
- The Chair of Governors, in liaison with the Heads, will ensure that any deficiencies and weaknesses in safeguarding arrangements are remedied without delay.
- The Chair of Governors, in liaison with the Heads, will ensure that this Safeguarding Policy is published on the Schools website, the Parent Portal and is also available to parents on request.
- The Governors will consider and approve an annual report on changes to safeguarding policy or procedures; on training undertaken by the DSLs, other staff and Governors (Including online learning); and on the place of safeguarding and child protection issues in the School curriculum including [Teaching about relationships, sex and health - RSHE](#).
- The Governing Body has appointed Dr Agnelo Fernandes as the Safeguarding Link Governor to liaise with the Croydon Safeguarding Children Partnership and partner agencies in the event of allegations of abuse made against the Heads. The DSLs and Link Governor will meet once every term and will work together to prepare the Annual Safeguarding Report and, with due regard for confidentiality, the DSLs and Link Governor may also discuss any safeguarding issues.
- The Safeguarding Governor should include filtering and monitoring in their annual audit and ensure that they are aware of any breaches or incidents from which lessons can be learnt. Measures to mitigate known risks can then be put in place.
- The Safeguarding Governor should feel confident that systems are in place and that the system will identify children accessing or trying to access harmful and inappropriate content online. At the same time, they are aware that 'over blocking' can lead to unreasonable restrictions as to what children can be taught concerning online teaching and safeguarding.
- The Governors put in place appropriate safeguarding responses to children who go missing from education or who are absent, 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 them going missing in the future.
- The Chair and/or Link Governor, will attend any relevant training courses as appropriate. All Governors receive appropriate safeguarding and child protection (including online) training at induction. This will allow them to provide strategic challenge to test and assure themselves

that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding.

- If information comes to Governors about an allegation against a member of staff, the Heads and Local Authority Designated Officer (LADO) will be informed within 24 hours.
- The Governors take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- The Heads will ensure that the Safeguarding Policy and Procedures adopted by the Governing Board are implemented and followed by all staff.
- The Heads will allocate sufficient time and resources to enable the DSLs and Deputies to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- The Heads will ensure that an environment exists with the School in which all staff feel able to raise concerns about poor or unsafe safeguarding practice and that such concerns are handled sensitively (whistle-blowing policy). Reporting wrongdoing by staff in the workplace, that does not involve the safeguarding and welfare of children, is dealt with in accordance with the School's Whistleblowing procedures.
- Where there is a safeguarding concern, the Governing Board and Royal Russell staff will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be 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.

#### 5. Key Contacts:

Position	Name	Contact Details (email/phone)
Designated Governor for Safeguarding	Dr Agnelo Fernandes	<a href="mailto:afernandes@royalrussell.co.uk">afernandes@royalrussell.co.uk</a> or via the Clerk to the Governors, Mr Neil Cufley 020 8657 4433 extension 203 <a href="mailto:ncufley@royalrussell.co.uk">ncufley@royalrussell.co.uk</a>
Designated Safeguarding Leads	Ms Sara Ward – Senior School	Royal Russell School Pastoral Deputy Head 020 8657 4433 extension 304 <a href="mailto:sward@royalrussell.co.uk">sward@royalrussell.co.uk</a>
	Mrs Sarah Pain – Junior School	Deputy Head - Pastoral 020 8657 4433 extension 231 <a href="mailto:s.pain@royalrussell.co.uk">s.pain@royalrussell.co.uk</a>
	Mrs Sarah Syradd	St David's Preparatory School Head Teacher 020 8660 0723 <a href="mailto:ssyradd@stdavidsschool.co.uk">ssyradd@stdavidsschool.co.uk</a>



Royal Russell Senior School	Mr Edward Hutchinson	Head of Pastoral Care, Housemaster 020 8657 4433 extension 360 <a href="mailto:ehutchinson@royalrussell.co.uk">ehutchinson@royalrussell.co.uk</a>
Deputy Designated Safeguarding Lead	Ms Suzanne Wood	Senior School, Chemistry Teacher, Deputy Housemistress <a href="mailto:swood@royalrussell.co.uk">swood@royalrussell.co.uk</a> 020 8657 4433
Royal Russell Whole School	Ms Hayleigh Schenk	Lead Nurse 020 8657 4433 extension 212 <a href="mailto:hschenk@royalrussell.co.uk">hschenk@royalrussell.co.uk</a>
St David's School		
Deputy Designated Safeguarding Lead	Mrs C Haddad	Head of Early Years / Key stage 1 020 8660 0723 <a href="mailto:colettehaddad@stdavidsschool.co.uk">colettehaddad@stdavidsschool.co.uk</a>
Deputy Designated Safeguarding Lead	Mrs J Mitchell	SENDCO / Assistant Head 0208 660 0723 <a href="mailto:jmitchell@stdavidsschool.co.uk">jmitchell@stdavidsschool.co.uk</a>
Deputy Designated Safeguarding Lead	Mrs Beth Lee	Office Administrator and DDSL 0208 660 0723 <a href="mailto:blee@stdavidsschool.co.uk">blee@stdavidsschool.co.uk</a>
<b>Croydon Agencies</b>		
Multi Agency Safeguarding Hub (MASH)  (to make a referral when concerned about a child)	Duty Social worker for  Urgent Safeguarding concerns	Tel: 0208 255 2888 (office hours)  Out of hours Duty Team: 0208 726 6400 press 5 for Children's Services  Online referral: <a href="https://www.croydon.gov.uk/concerned-about-a-child/">Concerned about a child?   Croydon Council</a>
Local Authority Designated Officer (LADO)	Jane Parr	<a href="mailto:lado@croydon.gov.uk">lado@croydon.gov.uk</a>  Tel: 0208 726 6000, Ext 24817  Mobile: 07716 092 630

## Other Key Contacts within our community

Position	Name	Contact Details (email/phone)
<b>ROYAL RUSSELL HEADMASTER</b>	Mr Chris Hutchinson	020 8657 3669 020 8657 4433 extension 205/204 <a href="mailto:Headmaster@royalrussell.co.uk">Headmaster@royalrussell.co.uk</a>
<b>ST DAVID'S PREPARATORY HEAD TEACHER</b>	Mrs Sarah Syradd	020 8660 0723 <a href="mailto:ssyradd@stdavidsschool.co.uk">ssyradd@stdavidsschool.co.uk</a>
<b>ROYAL RUSSELL HEAD OF JUNIOR SCHOOL</b>	Mr John Evans	020 8657 4433 extension 208 <a href="mailto:juniorHeads@royalrussell.co.uk">juniorHeads@royalrussell.co.uk</a>
<b>CHAIR OF GOVERNORS</b>	Mr Andrew Merriman	<a href="mailto:amerriman@royalrussell.co.uk">amerriman@royalrussell.co.uk</a>  Or via the Clerk to the Governors, Mr Neil Cufley 020 8657 4433 extension 203 <a href="mailto:governors@royalrussell.co.uk">governors@royalrussell.co.uk</a>

## Other Key Contacts outside Our Community

Key contact		Contact Details (email/phone)
Disclosure and Barring Service (DBS)	PO Box 110 Liverpool L69 3EF	0870 909 0811 <a href="mailto:customerservices@db.s.gsi.gov.uk">customerservices@db.s.gsi.gov.uk</a>
Teaching Regulation Authority		53 – 55 Butts Road, Earlsdon Park Coventry CV1 3BH
The Department for Education's Due Diligence and Counter Extremism Group Helpline		0207 340 7264 <a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
Croydon Police Contact For FGM		101
Local Police Non-Emergency		101
NSPCC National Child Trafficking Advice Centre		0808 800 5000 <a href="mailto:CTAC@nspcc.org.uk">CTAC@nspcc.org.uk</a>
NSPCC Whistleblowing Helpline		0800 028 0285 <a href="mailto:Help@nspcc.org.uk">Help@nspcc.org.uk</a>
CYPMHS for advice and Referral	South London and Maudsley Health Services	<a href="#">CYPMHS</a> Tel: 0800 731 2864 (Option 1)

## 6. Safeguarding Induction and Training

- The DSLs and DDSLSs receive updated Senior Designated Safeguarding Training from [Croydon Safeguarding Children Partnership](#) every two years and will undergo training to provide them with the knowledge and skills required to carry out the role. DDSLSs will be trained to the same standard as the Designated Safeguarding Leads. This training is in child protection, safeguarding and inter-agency working in line with Croydon Safeguarding Children Partnership agreed procedures.
- All staff receive appropriate safeguarding and child protection training at Induction as well as regular safeguarding updates, including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at Induction.
- The Safeguarding induction also include online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- At induction, policies are both provided and explained. This includes:

The School's Safeguarding Policy and Procedures (which incorporates the Staff Code of Conduct and Whistleblowing Policy) and the safeguarding response to those children who go missing from education.

- The Behaviour Policy
- The identity and role of the Designated Safeguarding Lead and the Safeguarding Team
- The Prevent Policy
- The Acceptable Use of IT Policy
- A copy of Keeping Children Safe in Education 2024 (KCSIE 2024 part 1)
- The Anti-bullying policy (including Cyber-bullying, prejudice-based and discriminatory bullying),
- The Supervision policies

Staff need to ensure that they have read and understood Part 1 of KCSIE 2024

Records are kept in the [HR Department](#) at Royal Russell and with the Head Teacher at St David's School

- All staff receive training and annual briefing on all Safeguarding policies which is provided in Staff Meetings. Additional briefing is given when policies change. Safeguarding updates, training and 'testing' will take place at regular intervals, but at least annually to ensure that staff are well equipped to deal with situations
- All staff, part-time staff, temporary staff and volunteers are issued with child protection guidance cards, stating the need to not ask leading questions during an interview and promise confidentiality.
- Staff with responsibility for boarding are trained in the specific needs of boarding pupils and alerted to the higher potential for relationship problems and child on child abuse within the boarding setting
- All staff receive training in their duty to raise concerns, where they exist, about the attitude or actions of colleagues (see Whistleblowing Policy). Further advice is available from the NSPCC. Please see contact list
- All staff are made aware that anyone can make a referral to Croydon Safeguarding Children Partnership at any time if they have a concern. If at any point there is a risk of immediate serious

harm to a child, a referral should be made to Croydon Safeguarding Children Partnership and/or the police immediately. If the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point. It is important for children to receive the right help at the right time to address risks and prevent issues escalating.

- All staff are made aware of the new reporting requirements with regard to known cases of Female Genital Mutilation (FGM).
- All staff are made aware of the requirements of the Government advice for schools and childcare providers on preventing children and young people from being drawn into terrorism. See [Appendix 2](#) and [Appendix 3](#) for further details.

## **7. Working with Croydon County Council (The Local Authority and a Safeguarding Partner)**

Royal Russell Schools are fully engaged to support the Local Authority and safeguarding partners in multi-agency safeguarding arrangements.

The Schools will ensure that it contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

New safeguarding partners and child death review partner arrangements are now in place.

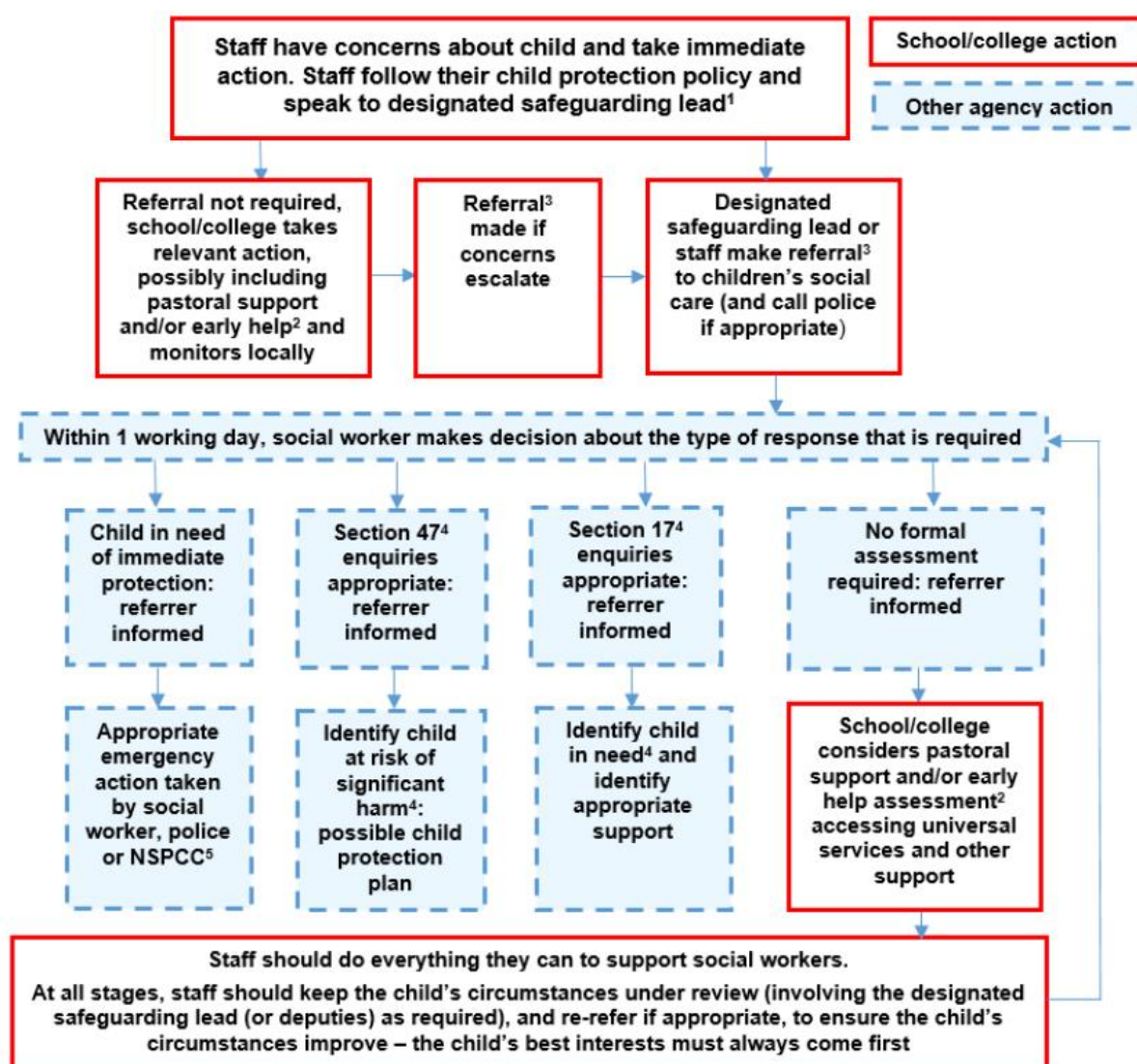
Locally, the three safeguarding partners (the Local Authority; a clinical commissioning group for an area within the Local Authority; and the Chief Officer of Police for an area (any part of which falls within the Local Authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Royal Russell understands the importance of its role in the three safeguarding partner arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies.

Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## 8. Sharing Information

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Royal Russell is committed to sharing, holding and using information for these purposes.

GDPR (General Data Protection Rules) and the UK Data Protection Act 2018, as well as the School's Privacy Policy outline the data protection principles which contain guidance about sharing information. Special category personal data may be shared to safeguard children at risk. Information may be shared with relevant authorities, without consent of the individual, if there is a risk of harm to a child. For further information on this topic, please see [Information Sharing](#).

The Schools will ensure that staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the UK Data Protection Act 2018 and the GDPR.

This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- For schools, not providing pupils' personal data where the serious harm test under the legislation is met

For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.

Where in doubt Royal Russell will seek independent legal advice.

The UK Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Further details on information sharing can be found:

- In Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- At Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- At [The Information Commissioner's Office](#) (ICO), which includes ICO GDPR FAQs and guidance from the department
- In [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

In order to improve our safeguarding protocols and communication, Royal Russell Schools have joined the [Boarding School Association Commitment to Care Charter](#). Royal Russell Schools are



also enrolled in [Operation Encompass](#), which means that the local police will contact us directly within 24 hours for any issues that may occur.

## **9. Recruitment of Staff**

Preventing unsuitable people from working with children is essential to keeping children safe. Rigorous selection and recruitment of staff and volunteers is, therefore key, and the responsibility of the Heads and Governing Board.

School procedures for appointing staff are in line with the DfE guidance and legislation as laid down in Keeping Children Safe in Education (September 2024). Arrangements for checking the suitability of staff and volunteers are those of the Disclosure and Barring Service (DBS) and Part 4 of The Education (Independent School Standards) Regulations 2014.

New staff, part-time staff, temporary staff and volunteers will receive statutory training on the School's child protection and safeguarding procedures (Including online safety) as part of their induction. All staff will be issued with the Staff Code of Conduct and must sign to confirm they have read and understood Part 1 of KCSIE 2024 and the School's Safeguarding documentation.

All activities taking place away from the Schools' site will ensure that they have undergone the necessary checks via the Royal Russell Evolve/St David's Risk Assessment Form distributed by the School Leadership Team.

Assurance must be obtained that appropriate child protection and safeguarding checks and procedures are carried out on any staff employed by another organisation and working with the School's pupils on the School site or on another site.

Full details can be found in the School's Staff Recruitment Policy.

Ms Anna Horrigan, The HR Manager, is responsible for staff recruitment procedures and staff appointment checks, in line with ISSRs.

## **10. Duty of Staff**

All staff at Royal Russell Schools, including supply staff and volunteers, have a responsibility to identify children who may be in need of extra help, or who are suffering, or who are likely to suffer harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

Staff must be aware that children may not feel ready or know how to tell someone they are being abused.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that we provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

If a member of staff has any concern about a child, they should discuss this with the DSLs or Deputy DSLs who will decide on an appropriate course of action. Information sharing is vital to good safeguarding.

Referrals do not need parental consent.

The early identification of potential problems relies upon the following general expectations which apply to all staff at all times:

- 1 Staff must be vigilant and open-minded and maintain the attitude 'It Could Happen Here'.
- 2 Staff must regularly encourage all children to share **any** concerns they have with an adult and they must listen sympathetically, taking any allegations seriously.
- 3 Staff must ensure that they:
  - Understand the systems and processes which support the welfare and safeguarding of children in the School, and seek clarification if anything is not clear to them
  - Are able to identify children who may be in need of additional help, and respond in appropriate ways consistent with our SEND policy, and with [the Early Help pathways guidance](#)
  - Are familiar with the indicators of various types of child abuse
  - Report suspicions of child abuse immediately
  - Have received appropriate safeguarding/child protection training on induction, and at appropriate intervals thereafter. Whilst it is one of the DSLs' responsibilities to ensure that staff have received the appropriate level of training, staff members have a reciprocal responsibility to check with the DSLs if they are unsure about their training requirements.
  - Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare ('contextual safeguarding')

## 11. Duty of Parents

- This policy focuses on the duties and the responsibilities of the Schools, but it is also worth stating briefly our expectations of parents. Parents are expected to help their children to behave in non-violent and non-abusive ways towards both staff and other pupils. Parents will be informed if it was necessary to use minimal force to protect a pupil from injury or to prevent a pupil from harming others.
- Parents should always inform the School of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the School of any changes in home circumstances, such as the death of a member of the family, separation or divorce that might lead to otherwise unexplained changes in behaviour or characteristics.
- Although the School will usually consult parents/guardians and the pupil in taking the decision to seek additional, external agency support for that pupil, consent is not required if the School has grounds to believe the pupil to be at risk of harm.
- Parents will be required to provide more than one emergency contact number of their child when joining the School and will keep the school informed of any changes arising.

## 12. Safeguarding Pupil Education

At Royal Russell, we work with pupils to give them a comprehensive programme of education about how to keep themselves safe, including online. This is carried out through House tutoring, Year Group Assemblies, Challenge Days, Weekly Assemblies, Chapel, IT and PHSE lessons and informally through tutorials, discussions, modelling of good behaviour etc. A chart is kept of the various education messages and this is reviewed by the Safeguarding Team to ensure the correct messages are given in a timely manner and through appropriate media.

School Prefects are given a briefing by a DSLs in safeguarding and reporting procedures. Parents are sent information via the Head's Newsletter on articles of interest which includes links to safeguarding policies. Their attention is drawn to messages being given to pupils via this means as well as through opportunities for talks to parents at Parents' Evening, Meet the Tutors and the Lecture Programme.

At St David's we work with pupils to keep themselves safe via the Icompute programme. Through the PSHE programme of study and Jigsaw, pupils are able to be made aware about social and emotional safeguarding issues.

### 13. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Royal Russell has a whole school approach to online safety which empowers our community to protect and educate pupils, parents, and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate **any** concerns where appropriate.

This Safeguarding Policy needs to be read in conjunction with:

- ICT Acceptable Use Policy
- The Staff Code of Conduct

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

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: 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; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The School networks have a sophisticated filtering system so that internet access and content is age appropriate as well as restricted depending on the time of day. School owned devices are already configured to have this filtering applied and any student-owned devices should be brought to the School IT department to have the filtering applied before being connected to the School network.

Please see [Department of Education Filtering and monitoring standards](#)

Whilst it is essential that the Schools ensure that appropriate filters and monitoring systems are in place, the Schools will be mindful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

At Royal Russell School, however, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, Royal Russell has a mobile phone policy that allows only the Sixth Form and Year 11 to have access to their phones during the school day. Firefly informs parents of what their children are being asked to do online, including the sites they will be asked to access.

## St David's

St David's pupils do not have access to mobile phone technology.

In the EYFS, school mobile electronic devices are used to capture images of children learning. These images are used as evidence for their EYFS Learning Journals, their online profile of development and some display and marketing purposes, including our School website. Such images are to be captured solely for these purposes. Mobile electronic devices must not be taken into children's toilets or used when they are changing.

If photographs of children washing their hands in the toilet area are needed for evidence, they must be taken in the presence of another member of staff. The gathering, storage and sharing of images of children by staff must be carried out using school equipment only and must adhere to our policies for E-Safety and Mobile Electronic Devices. Staff must be mindful of the additional risks incurred if such devices are removed from schools and must act responsibly to ensure images are stored safely. Staff must keep their personal mobile electronic devices out of use within the EYFS.

Safeguarding concerns might arise in a variety of ways. Information might be received from a concerned friend, or another child. Staff may become concerned by general chatter, or the behaviour of a colleague, or a child's parent. Information might be received from an internet user, or via a support service such as *ChildLine*. Changes in a child's appearance or behaviour might trigger concerns or unusual physical injuries to a child may become noticeable. It is important to note any patterns of indicators, which on a one-off basis may not be felt to be serious, but which in aggregate could be indicative of an underlying concern.

### 14. Guidelines for Appropriate Communication

Guidelines for appropriate communication are found in [Appendix 4](#) and should be read alongside the Staff Code of Conduct. The Guidelines for appropriate communication and include specific advice on the use of images in the Early Years Foundation Stage (EYFS).

### 15. Use of School or College Premises for Non-School/College Activities

Where Royal Russell Schools provides, hires or rents its facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) it will ensure that appropriate arrangements are in place to keep children safe.

The Schools will therefore seek assurance that the provider 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 for the provider to liaise with the schools on these matters where appropriate.

This applies regardless of whether or not the children who attend any of these services or activities are children enrolled at Royal Russell Schools.

The Schools should 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. The guidance on [Keeping children safe in out-of-school settings details](#) the safeguarding arrangements that Royal Russell should expect these providers to have in place.

At Royal Russell School, the Commercial Manager oversees these arrangements and liaises, as necessary, with the DSL. All hirer agreements include a specific section that requires compliance with KCSIE 2024 with a separate Safeguarding Agreement for Hirers.

When services or activities are provided by the Schools, under the direct supervision or management of Royal Russell or St David's staff, the Safeguarding Policy and Procedure will apply.

## SECTION 2: WHAT TO DO IF YOU HAVE A CONCERN ABOUT A PUPIL – RESPONDING AND REFERRING

### 16. Concerns about a Child

There are many levels of concern about pupils, some of which require immediate action and collaboration with external agencies, while others are at a much lower level and can be dealt with within the normal internal school structures. This section deals with the different types of referrals which can be made when there is a concern about a pupil.

Staff must report **any** concern even if they do not have proof that their concern is justified, as any form of help is better than waiting to see if concerns are confirmed and potentially escalate.

Staff should recognise that pupils with special educational needs and/or disabilities are particularly vulnerable and that additional barriers can exist when recognising abuse and neglect.

SEND pupils can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. SEND pupils can also be more vulnerable when they are in one-to-one situations with an adult. Please give due recognition to both of these circumstances when assessing whether or not you have a concern about a pupil.

### 17. Receiving and Reporting A Disclosure

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse in a child or young person, will make notes as soon as possible (preferably within an hour), writing down as exactly as possible what was said or seen and not their assumption and interpretation, and giving the date, time and location.

Staff should note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into 'proper terms').

Staff should use the "Myconcern!" safeguarding platform reporting tool, or if they do not have access to a computer, staff should use the Pastoral Concern Form in their respective department, and attach to it any hand-written notes. Original notes **MUST** be kept, signed and dated and include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.
- If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Leads (or Deputies).

All records of a child protection nature will be automatically directed to the DSLs who will record and update the pupil's online file using the Myconcern! safeguarding platform. Any pastoral concern form should be handed to the DSLs who will arrange for it to be kept securely. Access to these records is on a 'need-to-know' basis and decisions about access will be made by the Heads and DSLs.

Safeguarding and child protection records will be retained for the same length of time as the pupil file, i.e. until the child has left the schools (for primary schools), or for 25 years from the child's date of birth (for secondary schools).

When a child who is on the Child Protection Register leaves the Schools, the DSLs will inform the child's new school immediately and discuss with the child's key worker the transfer of any confidential information the Schools may hold. The Schools may also wish to pass on relevant information concerning a child's welfare, in accordance with the Croydon Safeguarding Children Partnership procedures.

Information sharing is justified where safety may be at risk and/or to support a pupil's transition to a new school.

### **Following through on a concern**

Although it is usually not possible to discuss child protection cases in full, a member of staff who has passed on information to the DSLs should expect an acknowledgement and a brief and confidential update on progress or outcome. Members of staff who are dissatisfied with the manner in which concerns have been handled, or believe that a child is still at risk and continuing to suffer, are at liberty, and indeed are obliged to contact the Local Authority themselves, challenging other agencies and professionals regarding their actions (or inaction) as appropriate.<sup>1</sup>

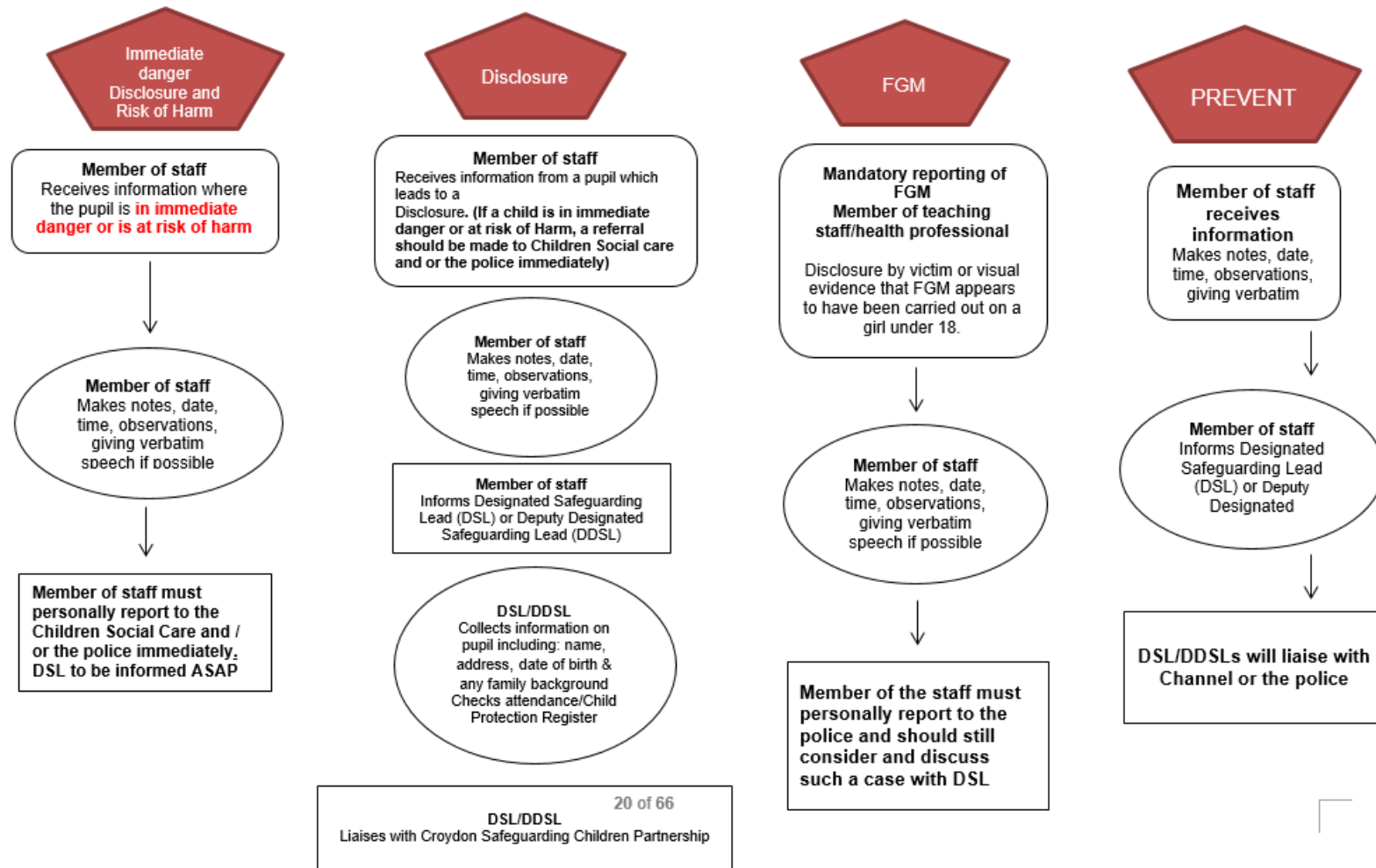
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<sup>1</sup> 'Anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.' *KCSIE (2024)*, s17.



## 18. SAFEGUARDING PROCEDURE

This flowchart is designed as a quick reference guide to illustrate procedures for all staff to follow when potential child protection or safeguarding concerns which could lead to a disclosure are raised.



## 19. Response to the Child and Information Gathering

Abuse is rarely disclosed explicitly by children themselves. When they do, it is essential that they are listened to and taken seriously. If a child (either as a victim or as a third party) asks to speak with a staff member about anything relevant to safeguarding concerns, they should not be promised confidentiality, nor told that the secret will be kept.

The staff member should listen sympathetically and carefully right to the end of what the child has to say. Even if it is not immediately, the child may have been struggling with this decision for days or weeks, and may have had to summon up tremendous courage to come forward. Therefore, however uncomfortable the details, the child should not be stopped mid-account nor be told that they need to speak to someone else. Notes should not be taken while the child is speaking, as this can put unhelpful pressure on the child by formalising the situation.

As a fundamental principle, children should be given a fair hearing and taken seriously. Even if the staff member suspects the child's disclosure is implausible, fanciful or malicious, they should continue to listen carefully, without betraying any hint of scepticism or asking any leading questions. It is not the role of the Schools or its DSLs to investigate allegations of abuse. It is their role simply to gather sufficient information to be able to make a preliminary decision about how to proceed. For this reason alone, staff members listening to disclosures from children can, when necessary, gently ask questions for basic clarification of the facts such as "what?", "when?" and "where?". However, they should be careful not to invite the child to speculate about motive as this might undermine any criminal investigation, and can prejudice outcomes.

Staff should not wait for a disclosure. If they have concerns, they should discuss them with the DSLs early, and not wait for concerns to escalate. The DSLs will usually decide whether to make a referral to Children's social care (CSC) but it is important to note that any staff member can refer their concerns to CSC directly.

Amongst other things, there may be discussion of whether an incident or pattern of incidents constitutes bullying rather than abuse and, particularly in relation to allegations of 'peer on peer' abuse, cyberbullying and matters of E-safety, reference should be made to our Anti-bullying Policy. In borderline cases, advice should be sought from the LADO, without naming the individual, before embarking on an investigation. Always bear in mind that bullying behaviour might be indicative of something else going on in that child's life. The bully should therefore be considered a potential child in need as well as the child being bullied.

At the end of the disclosure, the staff member should reassure the child that they have done the right thing, and offer a guarantee that the information will be taken seriously. The child should be advised not to discuss the matter with anyone else for the time being, and be reassured that the matter will be dealt with by experienced, caring people who operate with the greatest discretion. Great care should be taken here, and no staff member is in a position to tell a child not to speak to their parents. The DSLs must be consulted if the staff member is in any doubt.

The child should also be advised that they will be kept informed of the progress of the disclosure, and their wishes and feelings taken into account in responding to the matter. Clearly, however, the information will need to be passed on so staff members should never mislead children by promising that they will not pass on concerns to appropriate members of the Safeguarding Team.

As soon as possible, the staff member should write a comprehensive note of all that has been said, using the child's words as far as possible. The note should be added to the MyConcern platform. Beyond this strict channel of communication, confidentiality must be maintained.

## 20. Next Steps – Notification, Consultation and Reporting

In all suspected cases of abuse, details must be given to the DSLs without delay. The Heads must also be notified immediately<sup>2</sup>.

In the case of a child considered to be at risk of serious harm, then within 24 hours, the DSLs will consult and liaise with Children's Social Care and work with other agencies in line with [Working Together to Safeguard Children](#).

[NPCC- When to call the police](#) should help Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do.

Discussions with the LADO can be informal and anonymous in the first instance. Immediate action must be taken to protect a child at risk of immediate serious harm. Where the child requires urgent medical treatment, an ambulance should be called to take them to hospital. Parental consent is not required.

The role of the LADO is to:

- Provide advice and guidance in assessing the seriousness of any incident or allegation of significant harm or abuse of which the School becomes aware
- Help co-ordinate information sharing with the right people
- Monitor and track any investigation with the aim to resolve it as quickly as possible

The LADO should be informed of all serious allegations that come to the School's attention, so they can consult police and children's social care services (CSC) and other agencies in accordance with Croydon Safeguarding Children Partnership policy and guidance.

The LADO will consider the nature, content and context of the allegation and agree a course of action with the DSLs and any other relevant parties. The LADO may ask for relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the police need to be involved immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the allegations should be discussed with the LADO in order to help determine whether police involvement is necessary.

After discussion and agreement with the LADO, the DSLs may enter into a preliminary discussion with the parents, but only if there is no risk to the child of further harm resulting out of this action. The DSLs should seek to ascertain any possible additional information or explanations of the indicators which have given rise to a suspicion or allegation. These discussions are exploratory, and the DSLs should be careful not to prejudice the outcome of any potential multi-agency investigation.

All staff are able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime to the DSLs, a member of the School Leadership Team or the Heads and this concern will be taken seriously according to the School Whistle blowing Policy.

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

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<sup>2</sup> It will be a matter for professional judgement and circumstance as to the sequence of a staff member informing the DSLs and Heads. Both must be informed as soon as possible.

## 21. External Help Including Early Help and Child on Need and Child at Risk Referrals

When you have a safeguarding concern about a pupil you need either to talk to a member of the Safeguarding Team, usually the lead DSLs, or you can go straight to external agencies.

### Working with Other Agencies

We contribute to inter-agency work in line with statutory guidance. [Working Together to Safeguard Children and KCSIE 2024](#). The School recognises that it is an agent of referral and not of investigation. It fully accepts that the investigation of child abuse is the responsibility of the Croydon Children's Services Department and the police, and will do everything possible to support and assist them in their task.

We will endeavour to build relationships with other agencies so that understanding, trust and confidence can be built which will help to secure effective co-operation. As a school, we are active members of the Croydon Safeguarding Children Partnership. We also take seriously issues of self-harm, and are in contact with CYPMHS (Children and Young People Mental Health Services) and other local youth counselling services.

### Note on Early Help Pathways:

There are several levels of help available depending on the degree of need the pupil has. Keeping Children Safe in Education (September 2024) provides a chart to be used when you are not sure where to refer a concern to. It can be found on page 20 in Part One of the guidance. You will also find what to do if you're worried a child is being abused helpful and the NSPCC website also provides useful information. If you are unsure, please speak to the DSLs.

Croydon County Council (the local authority and one of the safeguarding partners) provides services with four tiers to support children.

### Croydon Safeguarding Children Board Threshold Guidance

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care. Effective early help relies upon local agencies working together to:

- Identify children and families who would benefit from early help;
  - Undertake an assessment of the need for early help; and
  - Provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.
- Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children.

### Multi Agency Work

As part of meeting a child's needs it is essential for governing bodies and proprietors to recognise the importance of information sharing between professionals and local agencies. Further details on information sharing can be found in Chapter One of Working together to safeguard children and at Information sharing: Advice for practitioners.

Whilst the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

## **22. Looked After Children, Children with SEN And Disabilities and Private Fostering**

The most common reason for children becoming 'looked after' is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, they should 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 should 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 DSLs should have details of the child's social worker and work with the Virtual School Head in the authority that looks after the child.

Royal Russell Schools acknowledge that Looked after Children remain vulnerable and it is important that agencies work together to safeguard them. The DSLs and Designated Staff will act as the member of staff to have responsibility for the welfare and progress of Looked after Children and will attend the necessary training. This School is committed to helping parents understand its responsibility for the welfare of all pupils.

The DSLs will, whenever possible, make themselves available to discuss individual children or situations with concerned members of staff.

Parents/guardians will be made aware of the School's Safeguarding Policy via initial meetings with parents of new pupils and in the Pupil and Parent handbooks. The Safeguarding Policy is also published on the Schools website and the Parent Portal.

Further information on Looked after Children is available

Designated teacher for Looked After Children and Previously Looked After Children - Statutory Guidance (February 2018) [Designated teacher for looked-after and previously looked-after children](#)  
Promoting the education of looked after and previously looked after children - Statutory Guidance (February 2018) [Promoting the education of looked-after and previously looked-after children](#)

### **Children with SEN and Disabilities**

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers.

### **Elective Home Education (EHE)**

Where a parent/carer has expressed their intention to remove a child from the School with a view to educating at home, we will work with the local authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their local authority of all deletions from their admission register when a child is taken off roll. Royal Russell will complete this requirement by submitting a Child Missing in Education (CME) Form.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of local authorities and their powers to engage with parents in relation to EHE.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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 may be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However, it should be clear to the School who has parental responsibility.

School staff should notify the DSLs when they become aware of private fostering arrangements. The DSLs will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, we will take steps to verify the relationship of the adults to the child who is being registered.

### **23. Counselling and Support for Children/Staff/Families**

Royal Russell and St David's staff are encouraged to offer sensitive advice and support to pupils, but should be aware that any information divulged to staff about illegal activity cannot be held in confidence and will be passed to the DSLs.

For any child undergoing a child protection referral and investigation, the need for support will be great and may be beyond what the School alone can offer. We aim to meet the need for support whenever possible to provide a secure environment in which each child feels valued and protected.

At Royal Russell, if there is a perceived need for counselling and external support, the School would, in appropriate cases, arrange guidance, professional services and/or counselling.

At St David's conversation with parents and pupils will take place. Private counselling will be funded by parents and the school facilitates the counselling sessions at the school.

The School will offer support where possible to the family of a child or children involved in a child protection investigation, within the time and expertise constraints of its role and always remembering the limits of confidentiality on all members of staff and the fact that it is the welfare of the child that is paramount.



## SECTION 3 ADVICE TO STAFF

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### 24. Professional Expectations and Boundaries

Members of staff should ensure that their behaviour and/or actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. One-to-one tuition, tutorials, sports coaching, music or drama lessons and escorting pupils to appointments outside school all present potentially dangerous situations which need careful managing. E-communication also presents a potential area of difficulty, as does staff access to boarding accommodation. **Further guidance** in these areas is given in the Staff Code of Conduct, online safety and acceptable use of ICT Policies

It would contravene the professional expectations of members of staff for them to have any form of sexual relationship with a pupil of any age. Members of staff should be aware that:

- It is an offence to have a sexual relationship with a pupil of any age, even those over 16, as all staff are in a position of trust in respect of pupils. Such a relationship would constitute an abuse of trust under the Sexual Offences Act 2003 (amended 2007).
- They must not incite one pupil to have sex with another nor to watch a sexual act either live or via media such as the internet
- They must not engage in sexual activity in front of a pupil
- Talking about a pupil in a suggestive or sexual manner or about their appearance is inappropriate.

### 25. Grooming Behaviours

Staff should be alert to the behaviour of others around pupils to spot grooming and to prevent abuse happening. Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of the child.

The perpetrators manipulate their victims over a period of time - sometimes years - gradually gaining the person's trust, desensitising and sexualising them for the purposes of abuse. Victims are taught to respect, trust and sometimes love their perpetrator and the betrayal of that trust can result in severe long-term trauma.

The process of grooming typically involves a gradual move from attention giving, through non-sexual touching, then to more intrusive and intimate behaviours.

Whilst these are not always signs of grooming, staff should be aware of adults who show any of the signs listed here. This is a very rough guide of what might be considered a concern. It is by no means exhaustive and in no particular order:

- Comments that safeguarding is taken too seriously
- Giving children personal notes or gifts
- Unusual degree of familiarity or favouritism shown by adult
- Regular physical contact between staff and pupils
- Spending significant amounts of free time with pupils
- Seeing children outside the workplace and/or in the holidays
- Wanting to transport children outside of normal structures and also alone
- Comments about the physical appearance of pupils
- Making sexually suggestive remarks to pupils
- Giving out personal telephone numbers
- Photographs of children on an adult phone
- Phoning pupils without due cause.

## 26. Conflicts of Interest

All adults who work within an educational context have a duty to report promptly **any** concerns or information about possible child abuse, whether those responsible are thought to be other children, adults, or colleagues. Our commitment to the paramount importance of the welfare of the child means that in both principle and practice it takes precedence over any other concern, relationship or reputation. Pupils cannot be expected to raise concerns if they are aware of staff failing to do so. Those who do not report information quickly could put children at risk and bring the Schools into disrepute and may face disciplinary action.

## 27. Use of Reasonable Force

There are occasions when a member of staff may need to use reasonable force to control or restrain a pupil. This can range from guiding a pupil to safety by the arm through to more extreme circumstances where a student needs to be restrained to prevent violence or injury. Reasonable force means using no more force than is needed. All members of school staff have the legal power to use reasonable force. It can also apply to people whom the Heads has temporarily put in charge of pupils such as unpaid volunteers, or parents accompanying students on a school-organised visit. The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

We have a legal duty to make reasonable adjustments for children with SEN and Disabilities. The School must draw up individual plans for vulnerable children to reduce use of force.

## 28. School Exchange Visits

KCSIE 2024 states that parents hosting school exchange visits fulfil the criteria for “regulated activity”. The School can use professional judgement to decide if the parents are suitable but also need to obtain a DBS enhanced certificate with barred list information on each of the parents/careers.

The School may also decide to request DBS checks on anyone over the age of 16 who lives in the home.

The School would be committing a criminal offence if it knows, or has reason to believe that, an individual is barred by the DBS from engaging in regulated activity but allows that individual to carry out any form of regulated activity, for example, providing care and accommodation in the UK to a child to whom they are not related.

## SECTION 4: RESPONDING TO AND REPORTING A CONCERN ABOUT A MEMBER OF STAFF

### 29. Reporting an Allegation of Abuse against Royal Russell, St Davids Staff, Volunteers, Supply Teachers, and Contractors

#### Procedure for Low-Level Concerns - Please see Low Level Concern policy

These are allegations/concerns that do not meet the harms threshold. Concerns may arise in several ways and from a number of sources. For example, suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the School; or as a result of vetting checks undertaken.

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 may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

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

At Royal Russell we promote an open-door and transparent and trusting culture in which all concerns about adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with supportively, promptly and appropriately. This creates an ethos in which all low level concerns are shared, recorded and dealt with appropriately.

This helps us to:

- Identify concerning, problematic or inappropriate behaviour early
- Minimise the risk of abuse
- Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos of Royal Russell School.

The Staff Code of Conduct sets out for staff what appropriate behaviour is, and the School expects all staff to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

Staff are required to share any low-level concerns with the Heads or the DSLs, who will address unprofessional behaviour and support the individual to correct it at an early stage. They will provide a responsive, sensitive and proportionate handling of such concerns when they are raised and will make any adjustments if there are weakness within the School's safeguarding system.

Where a low-level concern relates to a person employed by a supply/agency or a contractor to work in the Schools, that concern will also be shared with the Heads or DSLs who will record the concern. Their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

The Heads or DSLs would collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously. The information collected will help categorise the type of behaviour and determine what further action may need to be taken in a timely manner and where appropriate involving consultation between the Heads and the DSLs. Please also refer to the section on 'Guidance for Staff in Dealing with a Disclosure'.

At Royal Russell, all low-level concerns will be recorded and will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted. If the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

At the Junior Royal Russell School and St David's School, all low-level concerns will be reported to and recorded by the Heads who will act on it if appropriate and contact the LADO for advice if necessary.

These records will be kept confidentially and securely.

The records will be reviewed by the Heads so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Heads and DSLs will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

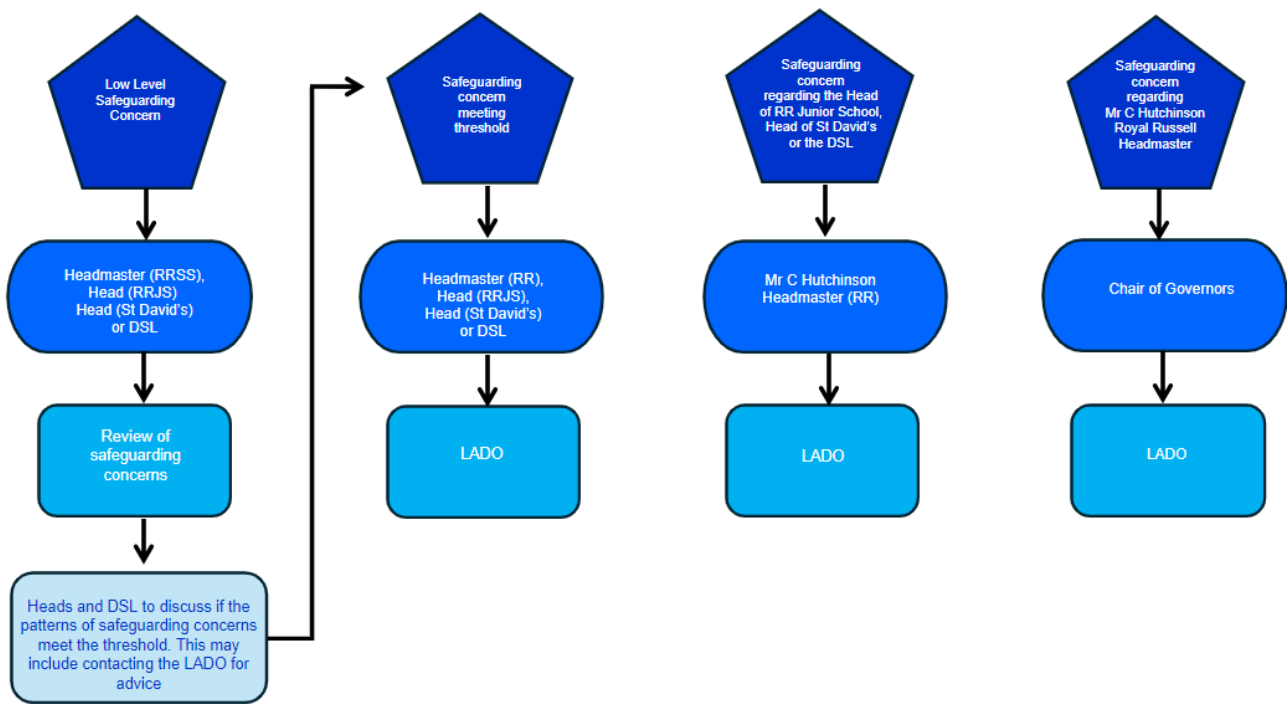
Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies may be revised or extra training delivered to minimise the risk of it happening again.

The information relating to the low-level safeguarding concern will be retained until the individual leaves the employment of the School.

The School would only provide substantiated safeguarding allegations in references. Low-level safeguarding concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

A low-level safeguarding concern which relates exclusively to safeguarding (and not to misconduct or poor performance) would not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

## Reporting Flow Chart:



## Procedure for allegations that meet the harms threshold

If the disclosure, or other evidence, reveals possible concerns which meet the harm threshold about staff members, supply staff, volunteers, or contractors it is important that no discussion should take place with the individual concerned until the Heads agrees to this course of action, after considering the welfare of the child. Allegations that may meet the harms threshold would include:

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

The last bullet point above includes behaviour that may have happened outside of school or college that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

Guidance on how such an allegation should be handled can be found in [Appendix 5](#) including specific reporting provisions for EYFS.

All allegations against staff, supply staff, volunteers and contractors will be referred to the Heads or to the Chair of Governors in the Heads's absence.

Where the allegation involves the Head of the Royal Russell Junior School/St David's or the DSL, the matter must be referred directly to Mr Chris Hutchinson, Royal Russell Headmaster.

Where the allegation involves Mr Chris Hutchinson (Headmaster of the Royal Russell Schools), the matter must be reported directly to the Chair of Governors, Mr Andrew Merriman, without notifying the Headmaster of the Royal Russell Schools first.

In serious cases of harm, the police will be informed from the outset. The Heads will discuss with the LADO the nature, content and context of the allegation. A course of action will be agreed which may include police involvement. Parents of the children involved will be contacted as soon as possible. Croydon Children's Services and/or the police may suggest extra support for those involved. Discussions will be recorded in writing and communication with the individual and the parents of the children agreed. Please refer to part 4 of KCSIE September 2024.

The member of staff will be advised to contact their union. Suspension of a member of staff will be considered in any case where there is cause to suspect a child is at risk of significant harm. Alternatively, consideration will be given to offering paid leave of absence or providing a teaching assistant/colleague to work with the member of staff. If a member of staff is involved in the supervision of boarding pupils, the School will provide alternative accommodation away from the School site.

### 30. Consideration for the Employee when a Safeguarding Allegation is Made

It is extremely important that when an allegation is made, the School makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The School 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.



If an allegation is made against anyone working or volunteering at the School, we will not undertake our own investigation into the allegation without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations prior to informing the Heads, or in his absence the DSLs, for the same reason. In borderline cases the Heads and/or DSLs are allowed to informally discuss the issue with the LADO on a, 'no names' basis.

For example: was the individual in the School at the time of the allegation(s), did the individual, or could they have, come into contact with the child, are there any witnesses and was there any CCTV footage? Where it is clear that an investigation by the police or Children's Social Care is unnecessary, the School may still wish to discuss the case with the LADO for advice.

The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until a relevant authority publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so.

### **31. Reporting to the Disclosure and Barring Service (DBS), to The Teaching Regulation Agency and The Secretary of State**

The School is committed to report promptly to the DBS any person (including volunteers or former pupils) whose services are no longer used for this.

The School is committed to reporting promptly to the DBS (and to the Teaching Regulation Agency in the case of a teacher) any person leaving the School (employed, contracted, a volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. The DBS and Teaching Regulation Agency would also be contacted if a person considered unsuitable to work with children resigns from the School. Contacts are outlined in this document on page 5.

Where the School dismisses or ceases to use the services of a teacher (including supply teachers or the use of an agency) because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the School will refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the [Teaching Regulation Agency](#).

## SECTION 6: MONITORING SAFEGUARDING

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### 32. How Safeguarding Practices are Monitored

The work of the Safeguarding Team is monitored by the Safeguarding Governor, Dr Agnelo Fernandes, who chairs the Education and Welfare Governing Board Committee.

This Committee consists of selected members of the Board of Governors, the Heads, the Royal Russell Deputy Head People/DSL and members of Royal Russell SLT.

The DSLs report annually on the Safeguarding practices to the Educational and Welfare Committee which is then brought to the attention of the full Governing Board for further review and sign off.

A termly meeting also takes place with the Safeguarding and Child protection Governor. Regular reports on the safeguarding practices are written and presented to the Education and Welfare Board Committee (E.W.C)

In the event of an allegation being substantiated, each case will be reviewed by the whole Governing Board to determine whether there are any improvements to be made to the School's practices to help prevent similar events in the future.

Updates are given to staff via e-communication and in staff meetings when they are made available by the Department for Education and the Independent Schools Inspectorate.

### 33. What to do if you have a concern about Safeguarding Practices

All staff should feel able to raise concerns about poor or unsafe practices and potential failures within the School's safeguarding regime. You have a responsibility to speak up if you have a concern. Please talk to any member of the Safeguarding team about your concerns. If you need further assistance, you can:

- speak to another member of staff and ask them to accompany you to relay your concerns;
- use the School's Whistleblowing Policy
- call the NSPCC whistleblowing helpline 0800 0280285 or email their helpline on [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

This policy is available to current and prospective parents in both the Parents Information Booklet, published annually, and on the School website.

A copy is sent annually to all via email.

At Royal Russell, an adapted version is available in the Student Handbook which is published on the School Portal and on House Noticeboards.

At St David's, the policy is located on the School website

**All staff must follow this policy: failure to do so is a disciplinary offence.**

### 34. The Curriculum

Staff will use many different elements of the School's curriculum to raise pupils' awareness of related issues including safeguarding, online safety and attempt to build pupils' confidence so that they have a range of contacts and strategies to ensure their own protection and the protection of others.

Pupils at the Schools are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

There are many links between this policy and other policy documents together with curriculum guidelines produced by the School. The School promotes the welfare and safeguarding of children through the Chapel/Assembly programme, [the Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) , the PSHE programme and parents' meetings and awareness evenings.

At Royal Russell this policy should be read in conjunction with the policies listed below, all of which are available in the SharePoint [HERE](#) or on request

At St David's this policy should be read in conjunction with the policies listed below, all of which are available on staff shared server:

- Anti-Bullying Policy
- Child on Child Policy and Procedures
- Attendance Policy
- Behaviour Policy for both the Junior and the Senior School
- Educational Visits Policy
- E-Safety Policy
- First Aid Policy
- Health and Safety Policy
- Inclusion Policy
- Learning and Teaching Policy
- Prevent Policy
- PSHE
- RSE Policy
- Staff Recruitment Policy
- Staff Code of Conduct
- Whistle-Blowing Policy
- Non-collection of Child Policy
- Visiting Speakers Policy
- Search and Confiscate Policy
- Addendum to Child Protection Policy
- Healthy Mind Policy (Royal Russell)
- Safeguarding Agreement for Hirers

Documents to be emailed/given to staff at Induction

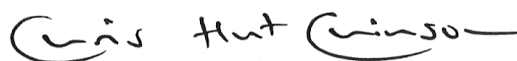
- Royal Russell Safeguarding policy
- KCSIE part 1
- Supervision policy
- Code of conduct
- Child Missing in Education
- Whistle blowing policy
- Anti-bullying Policy
- Behaviour Policy
- Acceptable use of technology Policy

### Policy Review Dates, Monitoring and Evaluation:

This policy will be reviewed annually with reference to Government guidance and Croydon Safeguarding Children Partnership by the Designated Safeguarding Leads and the Senior Leadership Team. The Governors will formally ratify the Policy annually.

The Designated Safeguarding Leads will review reports and practices on the number of pupils affected and update the Senior Leadership Team. It is the responsibility of the School Leadership Team to monitor and evaluate this policy to ensure the training needs of staff are met and procedure, in relation to the reporting of incidents, is in line with current legislation.

<b>Reviewed and Approved by EWC</b>	September 2023
<b>Reviewed and Approved by Board</b>	December 2023
<b>Reviewed and Approved by SLT</b>	September 2024
<b>To be reviewed and approved by EWC</b>	October 2024
<b>To be reviewed and approved by Board</b>	December 2024
<b>Next review</b>	September 2025



Chair of Governors  
Date: September 2024

Royal Russell School  
Date: September 2024

## **APPENDIX 1: Types of Abuse and Neglect**

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Abuse is a form of maltreatment. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm.

Pupils may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, including wholly online or via means used to facilitate offline abuse. They may be abused by an adult or adults, by a member of staff or a group of staff, another child or children or by a pupil or pupils.

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. Abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Pupils with disabilities, which include those with physical or mental disabilities as well as those with learning difficulties, are particularly vulnerable to abuse.

Staff are advised to maintain an attitude of 'It Could Happen Here' where safeguarding is concerned. They must be aware of the types of abuse and alert to the signs and symptoms, and know what to do if they spot something.

Staff should also be aware that abuse, neglect and safeguarding issues may not always be stand-alone events. In some cases, multiple issues will overlap with one another. Several low level concerns could be signs of something bigger.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School/or can occur between children outside of this environment. All staff, but especially the Designated Safeguarding Lead (and Deputies), should consider whether children are at risk of abuse or exploitation in situations outside of their families. 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.

### **Physical Abuse**

Physical abuse is the causing of physical harm to a child. It can lead directly to neurological damage, physical injury and disability. Some physical abuse is reactive; some may be premeditated with the intent to cause harm. Types of physical abuse include: hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child but may also be caused when a parent/carer fabricates symptoms of, or deliberately induces illness in a child.

Signs that a pupil has been physically abused include: bruises, abrasions, burns, scalds, bite marks, fractures and scars. Signs which may be indicators of concern include:

- Frequent injuries
- Explanations provided for an injury which may or may not be consistent with the injury
- Parents/carers undisturbed or uninterested by an accident or injury
- Unexplained delay in seeking treatment for an injury
- Repeated presentation for minor injuries which may represent a cry for help
- Reluctance to give information or mention previous injuries
- Children who flinch at sudden movements

## Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It has an important impact on developing child's mental health, behaviour and self-esteem. Types of emotional abuse include:

- Conveying to a child that they are worthless, unloved or inadequate
- Valuing a child only insofar as they meet the need of another person
- Not allowing a child to express their views, deliberately silencing them or making fun of what they say and how they communicate
- Persistently criticising, teasing or humiliating a child
- Imposing developmentally inappropriate expectations on a child such as interactions beyond the child's capabilities, or overprotection, limiting exploration or preventing participation in social interaction
- Causing a child to feel frightened or in danger
- Exploitation or corruption of children
- Allowing a child to see or hear the ill-treatment of another (which may be through domestic violence)
- Bullying or cyberbullying.

Signs of emotional abuse may be difficult to recognise as they are mainly behavioural. They include from the parent/child relationship perspective:

- Abnormal attachment between a child and parent e.g. anxious, upset at the thought of returning home, or no attachment at all.
- Parents who frequently complain about, or to, the child
- Parents who never praise or give attention to the child
- Parents who are emotionally distant from the child.

From the pupil perspective, they include:

- Failure to thrive
- Behavioural problems such as aggression or attention-seeking
- Low self-esteem, lack of confidence and fearfulness, distress or anxiety about doing something wrong
- Poor relationships such as withdrawn or isolating behaviours
- Delay in achieving developmental milestones.

Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

## Domestic Abuse

The Domestic Abuse Act 2023 received Royal Assent on 29 April 2023. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour, and the person to whom the behaviour is directed towards, must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2023 Act).

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 sexual identity, age, ethnicity, socioeconomic status, sexuality or



background and domestic abuse can take place inside or outside of the home. The Government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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.

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

## **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass website](#).

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan and work to help them retain their accommodation, or find a new place to live. The following factsheets usefully summarise the new duties: [Homelessness Reduction Act: policy factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the Designated Safeguarding Lead (or a Deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

## Mental Health

All staff should be 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. Education staff, 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 staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

More information can be found in [the Mental Health and Behaviour in Schools guidance](#), and the [DfE Preventing and Tackling Bullying Mental Health and Behaviour](#).

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, they should report it immediately using the School Safeguarding platform 'My Concern' and refer to the Healthy Minds Policy for Royal Russell.

At St David's staff are encouraged to report on My Concern and to go and speak with the Safeguarding Team.

## Sexual Abuse

Sexual abuse is the forcing or enticing of a child 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. Its adverse effects may endure into adulthood and affect the ability to build and maintain effective adult relationships.

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 commit acts of sexual abuse as can other children. Child sex abusers can come from any professional, racial or religious background.

Children under 16 years of age cannot provide lawful consent to any sexual intercourse, though in practice many are involved in sexual contact to which, as individuals, they may have agreed.

Recognition of sexual abuse is difficult unless the child chooses to disclose and is believed, but signs are likely to be behavioural and emotional. In addition to the list above there may be:

- Sexually explicit conversation or behaviour inappropriate to the child's age
- Self-harm including eating disorders and self-mutilation
- Suicide attempts
- Running away
- Poor peer relationships including unwillingness to be involved or communicate
- Sudden changes in behaviour or extreme mood swings

- Withdrawal
- Depression
- Inappropriately sexualised conduct

Children can be abused sexually by other children and they can be subject to violence and harassment. You will find more on this in the Child on child Appendix of this policy.

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical, emotional and/or psychological needs and is likely to result in serious impairment of health and development and long-term difficulties with social functioning, relationships and educational progress.

- Types of neglect include failure to:
- Provide adequate food, clothing and shelter (including exclusion from home)
- Protect a child from physical or emotional harm or danger
- Ensure adequate supervision including the use of inadequate care-givers
- Ensure access to appropriate medical care or treatment
- Respond to a child's basic emotional needs.

Signs of general neglect include a child who:

- Is unkempt or inadequately clothed
- Is listless, apathetic or unresponsive
- Frequently and/or inexplicably returns to school hungry
- Fails to receive basic medical care when ill or injured
- Lives in dangerous conditions e.g. around drugs, alcohol or violence
- Thrives away from the home environment but not in it.

## **Safeguarding Issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from

others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same; however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B.

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

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or no penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Further information about CSE including definitions and indicators is included in Annex B of KCSIE.

### **Other Forms of Abuse**

Information about other forms of abuse can be found in Appendix 1 and in Annex B of Keeping Children Safe in Education (September 2024). They include domestic violence, drugs, faith abuse, hate, gangs, mental health and relationship abuse.

### **So Called Honour-Based Abuse**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA

### **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.

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

Staff should be alert to the possibility of a girl being at risk of or already having suffered Female Genital Mutilation. There is a range of potential indicators that a pupil may be at risk, two of the most pertinent to our circumstances being:

- A pupil mentioning, she is going to be, or has been subjected to, 'a special procedure' connected with 'becoming a woman'.
- A parent asking for an extended period of time away from school with an unconvincing explanation for the absence.

Pupils may not be aware of the practice or that it might be conducted on them. Signs that FGM might already have been carried out include that a pupil may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviours after an absence from school
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Staff should keep an open mind about this form of abuse as it is part of the culture in pockets of various African countries, the Middle East, Indonesia, Malaysia and India, all of which are areas relevant to Royal Russell. It has also been identified in Europe, North America and Australia. It is believed that FGM may happen to girls in the UK as well as overseas. Girls of school age who are subjected to FGM overseas are likely to be taken abroad (often to the family's country of origin) at the start of the school holidays, particularly in the summer, in order for there to be sufficient time for her to recover before returning to school.

If staff have a concern, they should report this immediately to a member of the Safeguarding Team. If a teacher discovers that FGM appears to have been carried out on a girl aged under 18, they have a mandatory duty to report this directly to the police. They should also still discuss any such case with the DSLS and involve children's care as appropriate. The DSLS can assist with the report to police.

Further information can be found at: [Multi-agency statutory guidance on female genital mutilation](#) and [Mandatory reporting of female genital mutilation: procedural information](#).

The NSPCC runs a helpline on 0800 028 3550 and, for reporting concerns to the police, the number is 101 or 999 if it is an emergency.

## **Forced Marriage**

A forced marriage is a marriage in which one or both spouses do not consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. Whilst this is an unlikely form of abuse in our context, it is worth being aware of as some parents do raise concerns about what they perceive as the 'westernisation' of their daughters.

If staff have a concern about any form of honour-based abuse, they should speak to a member of the Safeguarding team, usually the DSLS, who will contact the Croydon Safeguarding Children Board and liaise with police and children's social care.



## Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the School's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, such as family and friends, may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods, such as social media or the internet, and settings, such as within the home.

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or Deputy) making a Prevent referral.

The Safeguarding Team at Royal Russell is aware of local procedures for making a Prevent referral.

### The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools and colleges wider safeguarding obligations. The Royal Russell Safeguarding team and other senior leaders in schools are familiar with the revised [Prevent duty guidance: for England and Wales](#), which are specifically concerned with schools (and also covers childcare).

For further education institutions in England and Wales. The guidance is set out in terms of four general themes: Risk Assessment, Working in Partnership, Staff Training, and IT Policies.

### Channel

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. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The Designated Safeguarding Lead should consider if it would be appropriate to share any 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 or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at [Channel guidance](#).

## **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs 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. Children and vulnerable adults are 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.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional 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 'trap house or cuckooing' or hotel room where there is drug activity; •
- owe a 'debt bond' to their exploiters; • have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office: [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

## **Modern Slavery and the National Referral Mechanism (NRM)**

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the guidance: [Modern slavery: how to identify and support victims](#)

## **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). Cyber-dependent crimes include;

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing.

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.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and National Cyber Security Centre .

### **Children Missing from School**

A child going missing from education is a potential indicator of abuse. Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where pupils go missing either from school or on a school trip. Details of these procedures are outlined in the Junior and Senior Supervision policy

All concerns should be raised immediately with the DSLs or DDSLs.

### **Child Missing in Education (CME)**

All children regardless of their circumstances are entitled to a full-time education, which is suitable to their age, ability and aptitude, and any special educational needs they may have. Children missing from education, particularly persistently, can be a warning sign for a range of safeguarding issues. We are also aware that it is important to act when problems are first emerging. Wherever possible we hold more than one emergency contact number for each child plus that of their parent(s)/carer.

Children Missing Education (CME) refers to 'any child of compulsory school age who is not registered at any formally approved education activity e.g., school, alternative provision, elective home education, and has been out of education provision for a substantial period of time (usually agreed as two months).

A child is classed as a Child Missing Education if they are:

- Of compulsory school age and
- Not on a school roll and
- Not receiving a suitable education otherwise than being at school, for example, at home, privately or in alternative provision

## Serious Violence

**All staff** should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. 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 a 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 (see paragraphs 33-35 of KCSIE).

**All staff** should be aware of the 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. Advice for schools and colleges is provided in the Home Office's [Advice to schools and colleges on gangs and youth violence](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

## Child on child Abuse Including Sexual Harassment and Sexual Violence

At Royal Russell, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the School's Behaviour Policy. All staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Royal Russell takes a zero tolerance approach to child on child abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face, both physically and verbally, and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'It Could Happen Here'.

All staff should understand, that even if there are no reports of such nature, it does not mean it is not happening, it may be the case that it is just not being reported. As such, it is important if staff have **any** concerns regarding child on child abuse they should speak to their Designated Safeguarding Lead (or Deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence) For further information about sexual violence see Annex B of KCSIE.

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; For further information about sexual harassment see Annex B of KCSIE.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); [Sharing nudes and semi-nudes: how to respond to an incident \(overview\)](#)
- Upskirting, (KCSIE Annex B) which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The initial response to a report from a child is incredibly important, as this can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra familial harms and any necessary support for siblings following incidents
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

All staff should be trained and aware of the School Policy and Procedures with regard to child on child abuse and sexual violence, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Records on MyConcern are reviewed regularly by the Safeguarding Team so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

## **Sexting (Youth Produced Sexual Imagery (YPSI))**

### **Youth Produced Sexual Imagery and the Law**

Youth produced sexual imagery is the creating and sharing of sexual photos and videos of under 18s and is illegal. This means that making, possessing, showing and distributing imagery of someone under 18, including yourself if you are under 18, is illegal.

- 'Youth produced' includes young people sharing images they, or another young person, have created of themselves
- 'Sexual' imagery is imagery which contains a naked young person, a topless girl, and/or a display of genitals or sexual acts, including masturbation. It may also include overtly sexual images of young people in their underwear.
- 'Imagery' covers both still photos and moving videos.

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Guidelines from the UK Council for Child Internet Safety can be found here: [Searching, screening and confiscation at school](#)

In order to avoid the criminalisation of young people, not all youth produced sexual imagery which is investigated by the police will result in a prosecution, even if there is enough evidence to do so. The police will record their decision not to prosecute and this is likely not to have a negative impact long term on the young person.

### **Receiving a YPSI Disclosure**

If a pupil makes a disclosure, you should contact the Safeguarding Team to discuss the course of action to be taken. This is likely to be in line with the normal Receiving and Reporting a Disclosure (found later in this Policy). Disclosures can come via a number of routes – from pupils, parents/family members and staff, and from members of the public. There are a few rules to observe in the receiving of the disclosure which are:

#### **Searching a device**

- DO NOT search a device unless there is an immediate problem as this is likely to cause significant embarrassment/additional stress to the victim
- DO NOT print out any material as evidence or move any material from one storage device to another e.g. by asking a pupil to forward the image to you (you could be committing an offence)

What to do and not to do with the image:

- DO confiscate and secure the device and bring it to the Safeguarding Team when you pass on the disclosure.
- DO NOT view the image unless there is a clear reason to do so
- DO NOT ask the pupil to send, share, move or save the image and do not do these things yourself (this could be an offence)
- DO block access to the image and prevent its distribution if possible.



Inform the Safeguarding Team immediately (the DSLS or Online-Safety Officer are the most appropriate members to contact).

### **Response to YPSI Disclosure**

- A brief summary of the actions to be followed are given below, however, the Safeguarding Team should use the full guidance from [UKCCIS: Sexting in schools and colleges](#).
- The incident should be referred to the DSLS as soon as possible who will then hold an initial review meeting with appropriate staff. At this stage the image should not be viewed without good cause - there are times when this is unnecessary and causes extra stress
- The DSLS will consider whether an offence has been committed and whether a referral might be necessary. The DSLS will inform the Heads (or Deputy in their absence) if an offence has been committed and/or a referral needs to be made
- There should be interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. Referrals can be made without parental consent if necessary
- A decision will be made whether or not to inform the police and consideration will be given to the need to secure a device for the police
- If the police are not to be informed, consideration must be given to the searching, viewing and deleting of images
- Decide on a response and record the discussions/decisions
- Contact other agencies as appropriate
- Evolve a strategy for containing the incident and managing student reaction
- Review the outcome and procedures to prevent further incidents
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately
- There is further information on bullying and cyberbullying in the Anti-bullying Policy which might need to be used in conjunction with this guidance.

### **Lesbian, Gay, Bi-Sexual or Transgender (LGBT)**

Pupils who express a curiosity about, an interest in or who identify as LGBT, or who are gender-fluid, can be particularly vulnerable to some form of abuse. There is a forum for students to meet and discuss issues, which is led by a strong set of older pupils, and a selected member of staff. Staff should be alert to negative comments or actions against such pupils and report this immediately.

The School also has a Transgender Policy which provides guidance about how to respond to a pupil who expresses an interest in transitioning.

### **Listening to Young People**

In order to help pupils, we need to listen to what they say. Pupils have a number of routes to seek help; they can talk to:

#### **At Royal Russell**

- Senior Prefects
- Housemasters/Housemistresses and their Deputies
- House staff, Tutors and teachers
- The Heads and other members of the Senior Leadership Team (SLT)
- Heads of Year
- Pastoral Staff including: Assistant Housemothers and School Office Staff

- The Safeguarding Team
- The Medical Staff including the School Doctor and the Counsellors
- Parents
- The Independent Listener
- External helplines such as ChildLine

### **At St David's**

In order to help pupils, we need to listen to what they say. Pupils have a number of routes to seek help; they can talk to

- Form teacher
- Head of Pastoral Care
- Members of SLT
- Safeguarding Team
- Main Office school
- External helplines such as ChildLine

## APPENDIX 2: IDEOLOGICAL HARM: RADICALISATION, EXTREMISM AND THE ‘PREVENT DUTY’

Though not an accepted category of abuse in its own right, the vulnerability of children to being seduced by extreme ideological positions is something we take very seriously at Royal Russell. Recent Government legislation means that it is helpful to include here a summary of the new ‘Prevent Duty’ for those working in education as background information for all Royal Russell staff.

Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. Consistent with the requirement to promote *fundamental British values*, all staff have a statutory duty to have due regard to the need to prevent children from being drawn into terrorism. In interpreting what is meant by ‘due regard’, we take guidance from the Government’s *Prevent* strategy, including the *Channel* programme, which aims to ensure that vulnerable children of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism. Success of this programme depends on effective communication and co-operation between staff, individuals, their families and, where appropriate, the Local Authority and other agencies.

Without undermining values such as freedom of speech, mutual respect and tolerance, all staff must respond to the ideological challenge of extremist views. ‘Extremism’ is defined as vocal or active opposition to *fundamental British values*, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs. The definition specifically includes calls for the death of members of our armed forces, whether in this country or overseas. It also includes the notion of *non-violent* extremism, which can create an atmosphere conducive to terrorism, and can popularise views which terrorists exploit. Extremism can take many forms whether ideological, political or religious. It can manifest itself explicitly and aggressively, for example through inciting hatred or a call to arms, or through more subtle and sophisticated channels of propaganda, including social media. These channels exploit aspirational images of success, status and belonging, and personal and moral duty which can capture the imagination of young minds.

Our classrooms are safe spaces where children can understand and discuss a wide range of sensitive topics, including extremism. In the process of promoting critical thinking, and in learning how to challenge terrorist ideologies, we recognise that staff may occasionally find themselves faced with a paradox. In an educational and developmental context, it is natural for children to want to explore and question different views and beliefs, some of which may, if only hypothetically or temporarily, challenge *fundamental British values*. Staff must exercise careful professional judgment in such cases, and above all, whether inside or outside the classroom, they must be particularly alert to risk-indicators of vulnerable children and, if appropriate, must seek further guidance. This is a complex and sensitive area, and over-simplified assessments can increase, rather than reduce risk.

There are five dimensions to the actions we take in response to the Prevent Duty:

- Risk assessment
- Working in partnership with local authorities
- Awareness raising amongst staff
- Protection from terrorist and extremist material when accessing the internet in the School
- Building resilience to radicalisation through the curriculum, e.g. through citizenship and religious education, and considerations for pupils’ spiritual, moral, social and cultural (SMSC) development.

These aspects are addressed through our RSE policy.

### ***Specific tasks for the DSLs relating to the Prevent Duty***

The DSLs should establish appropriate and proportionate measures to raise awareness of the Prevent Duty amongst staff and to achieve the following:

- Assess the risk of children being drawn into terrorism. Document the risk assessment and any subsequent action plan. Examples of a *Prevent Self-Assessment Template*, and *Prevent Duty Action Plan*, are available here [Prevent Within School](#) or [The prevent duty: for schools and childcare providers](#)
- Ensure that safeguarding arrangements take into account the Prevent policies and procedures of the Safeguarding Partner and Child Death Review Partner
- Ensure that staff have training that gives them the knowledge and confidence to identify<sup>3</sup> children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism. As a minimum, the DSLs should attend WRAP (Workshop Raising Awareness of *Prevent*) training where available, and be aware of the process for referring individual cases of vulnerability to the *Channel* programme, as opposed to local Children's Services in the normal way
- Ensure that there is appropriate checks and supervision of visiting speakers to the School to prevent presentations, including the distribution of materials, which are (not deleted) contrary to fundamental British values.
- The incorporation of any necessary syllabus amendments (e.g. in citizenship, history, politics, religious education)
- Protection for children from terrorist or extremist material when accessing the internet

More guidance on the Channel programme is available here: [Channel and Prevent Multi-agency Panel \(PMAP\) guidance](#)

Guidance for schools on how terrorist groups such as ISIL use social media to encourage travel to Syria and Iraq is available here: [The use of social media for online radicalisation](#)

All Staff will be trained using the prevent training module from Educare

**For further information:**

- [Croydon Safeguarding Children Partnership](#)

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<sup>3</sup> Where appropriate, staff should familiarise themselves with general risk indicators for vulnerability to being drawn into terrorism listed in Appendix 10

## **APPENDIX 3: RISK INDICATORS OF BEING DRAWN INTO TERRORISM**

NB references below are to 'child' which includes young people up to the age of 18.

### **Vulnerability**

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups

### **Access to extremism/extremist influences**

- Is there reason to believe that the child associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via virtual and electronic communications etc)
- Is there reason to believe that the child has been or is likely to be involved with extremist/military training camps/locations?
- Is the child known to have possessed or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence?
- Does the child sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?
- Experiences, behaviours and influences
- Has the child encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child from within or outside the UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying). It is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child come into conflict with family over religious beliefs/lifestyle/dress choices?
- Does the child vocally support terrorist attacks; either verbally or in their written work?
- Has the child witnessed or been the perpetrator/victim of racial or religious hate crime?

### **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child travelled for extended periods of time to international locations known to be associated with extremism?

- Has the child employed any methods to disguise their true identity? Has the child used documents or cover to support this?

### **Social Factors**

- Does the child have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child experience a lack of meaningful employment appropriate to their skills?
- Does the child display a lack of affinity or understanding of others, or social isolation from peer groups?
- Does the child demonstrate identity conflict and confusion normally associated with youth development?
- Does the child have any learning difficulties/mental health support needs?
- Does the child demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child have a history of crime, including episodes in prison?
- Is the child a foreign national, refugee or awaiting a decision on their immigration/national status?
- Does the child have insecure, conflicted or absent family relationships?
- Has the child experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child's life has extremist views or sympathies?

### **More critical risk factors could include:**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

### **If you have any concerns discuss them with the Designated Safeguarding Lead**

The Department for Education has also published advice for schools on [the Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.



## APPENDIX 4: GUIDELINES FOR APPROPRIATE COMMUNICATION

### These guidelines should be read alongside the Staff Code of Conduct

Matters concerning electronic communication are dealt with under the Royal Russell E-safety Policy and Mobile Electronic Devices Policy however, a summary of those pertaining to safeguarding and child protection are included below:

- Communication between adults and children, by whatever method, should take place within clear and explicit professional boundaries
- Adults should not share personal information with children, or request or respond to any personal information from the child, other than that which is appropriate within the professional role
- Personal information should not be shared via mobile electronic devices, webcams, internet chat rooms, videos, digital cameras, blogs or apps
- All communication with pupils and staff should remain transparent and open to scrutiny and take place on the school network using school devices.
- School mobile phones are available for school trips to minimise the need for personal telephone information being given out. If it becomes necessary to share personal information for whatever reason, e.g. the giving of a mobile phone number on a school trip, a member of the School Leadership Team (SLT) will be informed to ensure transparency
- If email communication is needed, children are to use the School email system
- Any inappropriate use of electronic communication by children should be reported at once to a member of the School Leadership Team
- The use of staff personal mobile electronic devices to take or record images, video or audio footage of pupils in school or on trips is to be avoided. In certain circumstances, the use of personal mobile electronic devices equipment may be permitted with prior consent from a member of the SLT. In such circumstances, images must be uploaded onto the School system and deleted from the personal device as soon as possible
- All staff should be aware of the potential risks to safeguarding involved when electronic images of pupils are being stored on devices that are taken out of school. Every reasonable measure must be taken to ensure that images of children are not shared electronically in the public domain unless through the agreed channels as stated in our policy for the use of images of children and consented to by parents on admission
- In the EYFS, school mobile electronic devices are used to capture images of children learning. These images are used as evidence for their EYFS Learning Journals, their online profile of development and some display and marketing purposes including our school website. Such images are to be captured solely for these purposes. Mobile electronic devices must not be taken into children's toilets or used when they are changing. If photographs of children washing their hands in the toilet area are needed for evidence, they must be taken in the presence of another member of staff. The gathering, storage and sharing of images of children by staff must be carried out using school equipment only and must adhere to our policies for E-Safety and Mobile Electronic Devices. Staff must be mindful of the additional risks incurred if such devices are removed from school and must act responsibly to ensure images are stored safely. Staff must keep their personal mobile electronic devices out of use within the EYFS.
- **Any** concerns arising over taking or sharing of images, video and audio must be shared with a member of the SLT
- The member of staff in charge of any activity taking place away from the School site will ensure that they have undergone the necessary checks via the Royal Russell Risk Assessment Form, distributed by the School Leadership Team
- Assurance must be obtained that appropriate child protection checks and procedures are carried out on any staff employed by another organisation and working with the School's pupils within the School or on another site
- Staff are to be aware of the need for appropriate permission from a member of the SLT when giving one to one tuition or coaching out-of-hours or away from the School site.
- Parental consent and permission from a member of the SLT should be obtained prior to a member of staff giving a lift to a pupil in their car

## **APPENDIX 5: ALLEGATIONS OF ABUSE BY STAFF**

While considerations of child protection must always be paramount, reasonable care must also be taken to safeguard staff against the effects of false and malicious allegations. However, if it is suspected or alleged that a member of staff has:

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

Then the matter must be brought promptly and confidentially to Heads or to the Chair of Governors in the Heads's absence.

It is entirely possible that a person making an allegation or disclosure which involves a work colleague will judge that the information is of a nature sufficiently grave or confidential as to warrant bypassing the DSLS and informing the Heads directly. What is important is that, one way or another, the Heads receives the information immediately.

If the DSLS is the subject of the allegation, then the Heads will of course need to be informed directly. If the Heads is the subject of the allegation, then the Chair of Governors must be informed.

In accordance with section 3.8 of the EYFS Statutory Framework (2014), a report must be made to Ofsted of any allegation of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere). The notification should include action taken, and be made as soon as reasonably practicable, but at the latest within 14 days of the allegations being made. Failure to comply with this requirement constitutes a statutory offence.

### **Preventive Measures to Avoid an Allegation**

All staff, supply/agency or contracted staff and volunteers who have day-to-day contact with children in a variety of situations are vulnerable to accusations of abuse. Adults in the School are made aware (including EYFS staff) of the fact that they do have to be very careful and are aware of the following guidance:

- Never to engage in inappropriate electronic communication with a pupil or to use mobile telephone, personal camera or iPad to take photos or videos of children (see IT AUA)
- Not to display any photos of children on any social media site
- Avoid being over familiar with children and parents
- If working with a child one to one, and there is no glass window into the room, the door should be left open
- To wear appropriate clothing (see Staff Code of Conduct)
- Not convey a pupil in their own car (see Staff Code of Conduct)

A 'no touch' approach is impractical for most staff and in some circumstances may be inappropriate. The general culture of 'limited touch' is adapted, where appropriate, to the individual requirements of each pupil. Wherever possible a child will dress them self and tie back their own hair, although we recognise that with very young children and SEN children some assistance may be required, but this would be kept to minimum.

There may be times when it is entirely appropriate and proper for staff to have physical contact with pupils, but this is only in ways appropriate to their professional role. Physical contact may be appropriate in the following circumstances:

- When a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- When a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus; or
- When there is a need to take urgent action to avoid an incident or injury.

Staff use their professional judgement at all times. Physical contact is always appropriate for the age, understanding and sex of the child and never threatens or is sexually inappropriate. Staff must be sensitive to an individual's cultural background and any special educational needs.

Staff should not have unnecessary physical contact with pupils and must be alert to the fact that pupils or onlookers can misconstrue minor forms of friendly physical contact. There must be no physical contact when disciplining a child, as even the smallest touch to the arm can be misinterpreted.

### **Supply Teachers**

In some circumstances the School will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst the School is not the employer of supply teachers, it should ensure allegations are dealt with properly. In no circumstances should the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome.

The Governing body should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The School will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Supply teachers, whilst not employed by the School, are under the supervision, direction and control of the governing body when working in the School. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues, such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager, or equivalent, to meetings and keeping them up to date with information about its policies.

### **Communication with the alleged abuser**

The staff-member should not be told of the allegations until the DSLS agrees to this course of action, after considering the welfare of the child. The expectation is that in most cases the employee will be immediately informed of any allegations, but in the case of alleged sexual abuse, (or other rare cases requiring special action to protect a child), the DSLS will ask for a delay in informing the alleged perpetrator to ensure that the child is protected, and evidence secured. Such delay should be kept

to an absolute minimum, and in such cases a week would be regarded as a long time, unless there are special circumstances.

### **Communication with outside parties**

The DSLS (or Heads/Chair of Governors, if the allegation compromises the DSLS or Heads) will contact the LADO within 24 hours if and when it is believed that a member of staff has behaved in a way that has or could have harmed a child, or possibly committed a criminal offence against a child, or conducted themselves in such a way as to suggest they are not suited to working in an educational establishment.

The DSLS/Heads/Chair of Governors will coordinate any investigation with the appropriate LADO(s), the police and any other agencies that are involved, and will act as a channel of communication with the School. It would normally be the case that in the event of an allegation against a staff-member which is likely to require full operation of the Child Protection Procedures, there will be an inter-agency planning meeting, to which the Heads/Chair of Governors will be invited, and which will determine the appropriate action.

The child or children may move to classes where they will not meet the member of staff, but this decision would only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It would be made clear that this is not a punishment and parents have been consulted.

### **Suspension**

If a matter is referred for formal investigation under the Child Protection procedures, consideration should be given to suspending the employee until investigations have been completed. Suspension does not imply a finding of guilt but is intended to enable a dispassionate investigation of the facts, unimpeded by interpersonal tensions. Any employee who is suspended must be informed immediately for the reason for suspension. A member of staff suspended in such a context must not remain on the School premises.

If the case is not referred under the Child Protection arrangements, but in the professional opinion of the Heads further action is necessary, then the allegation will be investigated under the disciplinary/complaints procedures. Clearly any case of striking or otherwise physically chastising a child is at first sight a reason for disciplinary investigation.

At any stage in the process, as soon as it becomes clear to the Heads that the conduct of the employee could be regarded as gross misconduct (i.e. conduct which if proven goes to the root of the contract of employment), then it is important that the employee is suspended. If this is not done, it could undermine the case for dismissal, because the employer has not immediately treated the alleged conduct as so serious as to require suspension. Clearly the decision on suspension will only be made once it is established there is a case to be investigated. So such action will only follow the initial gathering of the facts to determine that the alleged misconduct could have occurred, and that there is evidence which needs investigation. It must be re-emphasised that taking such action does not imply any finding of guilt.

### **Support for the member of staff**

The Heads must ensure that the member of staff is provided with the opportunity for personal support by someone who is not involved in pursuing the allegation. This should be additional to ensuring the employee has the opportunity to contact their trade union or professional association.

## **Resolution of the investigation**

Every effort should be made to resolve alleged cases of abuse so that they are not left open to widespread speculation which can be damaging for all parties. If the allegation is judged to have been malicious, false, or unsubstantiated, then a confidential record will be kept but the decision will not affect the member of staff's employment.

If the allegation is substantiated, and the member of staff resigns or is asked to leave the on the grounds that they have caused harm, engaged in criminal behaviour, or is otherwise no longer considered suitable to work with children, then the Heads or Chair of Governors will, within one month, write a report giving the details of the case to both the Disclosure and Barring Service, and, as appropriate, the Teaching Regulation Agency or other professional body. In such cases the School will not enter into settlement or compromise agreements, and will refer to substantiated allegations in any reference provided for employment involving children or vulnerable adults.

## **Outcomes of Investigations**

Allegations found to be malicious will be removed from personnel records and any disciplinary action against the individual will follow the behaviour policy. For all other allegations, the following will be kept on the confidential file of the accused and a copy provided to the accused:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- A note of any action taken and decisions reached, will be kept on the confidential personnel file of the accused.

The purpose of the record is to enable accurate information to be given in response to any future reference request, where appropriate. The record will be retained until the accused has reached normal pension age or for a period of ten years from the date of the allegation if that is longer.

## **APPENDIX 6: FURTHER INFORMATION ON TYPES OF CHILD ABUSE**

This advice is taken from the [NSPCC Website](#) which is recommended in KCSIE (2022) as a suitable source for further reference and advice. This advice is taken from the [NSPCC Website](#) which is recommended in KCSIE (2024) as a suitable source for further reference and advice. This advice is taken from the [NSPCC Website](#) which is recommended in KCSIE (2022) as a suitable source for further reference and advice. This advice is taken from the [NSPCC Website](#) which is recommended in KCSIE (2024) as a suitable source for further reference and advice.

### **Online Abuse**

[Read more about online abuse](#)

### **Sexual Abuse**

[Read more about sexual abuse](#)

### **Physical Abuse**

[Read more about physical abuse](#)

### **Neglect**

[Read more about neglect](#)

### **Emotional Abuse**

[Read more about emotional abuse](#)

### **Child Sexual Exploitation**

[Read more about child sexual exploitation](#)

### **Female Genital Mutilation (FGM)**

[Government Guidelines on FGM](#)

[Read more about FGM](#)

### **Bullying and Cyberbullying**

[Read more about bullying and cyberbullying](#)

### **Domestic Abuse**

[Read more about domestic abuse](#)

### **Child Trafficking**

[Read more about child trafficking](#)

### **Grooming**

[Read more about grooming](#)

### **Harmful Sexual Behaviour**

[Read more about harmful sexual behaviour](#)



## APPENDIX 7: HYPERLINKS TO FURTHER INFORMATION ON SPECIFIC SAFEGUARDING TOPICS

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The TES website and the NSPCC website are good sources of this support.

Royal Russell staff can also access broad government guidance on the issues listed below via the embedded links to the GOV.UK website:

Abuse

[Supporting practice in tackling child sexual abuse – CSA Centre](#)

Child Missing from Education

<https://www.gov.uk/government/publications/school-attendance>

Child Missing from Home or Care

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

Child Sexual Exploitation (CSE)

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

County lines

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863323/HOCountyLinesGuidance - Sept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf)

Bullying including Cyberbullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Domestic Violence

<https://www.gov.uk/domestic-violence-and-abuse>  
National Domestic abuse helpline (24 hours) 0808 2000 247

Drugs

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

Faith abuse

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

Female Genital Mutilation (FGM)

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

Forced marriage

<https://www.gov.uk/forced-marriage>  
[The right to choose](#)

Gangs and youth violence

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing youth violence and gang involvement v3 March2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

Gender-based violence/violence against women and girls (VAWG)

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

Mental Health

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

Private Fostering

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

Preventing Radicalisation

<https://www.gov.uk/government/publications/channel-guidance>

Sexting

<https://learning.nspcc.org.uk/research-resources/briefings/sexting-advice-professionals>

LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

Teenage relationship abuse

<https://www.gov.uk/government/collections/this-is-abuse-campaign>

Trafficking

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

## Safeguarding teaching tools

The following resources, plus many more listed in Annex B of KCSIE 2024, may also help schools and colleges understand and teach about safeguarding:

- DfE advice for schools: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Every Mind Matters](#)
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support

## Others

The Independent Schools Inspectorate (ISI) website can be found [here](#)

OFSTED Safeguarding Children: 08456 404046 (Monday to Friday 8.00am to 6.00pm).  
Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

Children's Commissioner: <https://www.childrenscommissioner.gov.uk/>

NSPCC: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Childline: <http://www.childline.org.uk/>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

## **APPENDIX 8: ROLE OF THE DESIGNATED SAFEGUARDING LEAD (KCSIE 2024)**

Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### **Deputy designated safeguarding leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- Of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- Where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

### **Working with others**

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

- As required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCO’s), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher and relevant strategic leads, taking 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 identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college

This includes:

- Ensuring that the school or college knows who its cohort of children who have or have had a social worker are, 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, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2024.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO’s) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## **Raising awareness**

The designated safeguarding lead should:

- Ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- Ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

## **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers<sup>156</sup>

- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support the school or college with regards to the requirements of The Prevent Duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses, and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals processes, and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and,
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and Sharing Information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the Designated Safeguarding Lead should be equipped to:

- Understand the importance of information sharing, both within the School and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;



- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping