



WESTMINSTER
SCHOOL

SAFEGUARDING POLICY

Author: James Kazi
Lead: Under Master

Date: June 2020
Review Date: September 2020

POLICY ON SAFEGUARDING

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

CONTACTS

School safeguarding personnel

Designated Safeguarding Lead (DSL):

James Kazi, The Under Master

E: james.kazi@westminster.org.uk

T: 020 7956 1078

M: 07889 299075

A: Westminster School, Little Dean's Yard, Westminster, LONDON. SW1P 3PF.

Deputy DSLs:

Dr Gabrielle Ward-Smith, Housemaster of Purcell's,

E: gabrielle.ward-smith@westminster.org.uk

M: 07710 057618

Jeremy Kemball, Deputy Head (Boarding and Educational Partnerships)

E: jeremy.kemball@westminster.org.uk

M: 07739 920381

Clare Leech, Head of Upper School,

E: clare.leech@westminster.org.uk

M: 07770 194648

Governor with Responsibility for Safeguarding:

Dr Priscilla Chadwick

E: priscilla.chadwick@westminster.org.uk

External safeguarding contact details

Anyone with a concern about a child can make a referral to the Tri-Borough Local Safeguarding Children Partnership (LSCP) ¹:

W: <https://www.rbkc.gov.uk/lscb/about-us>

Westminster Children's Social Care:

E: accesstochildrenservices@westminster.gov.uk

T: 020 7641 4000 (out of hours 020 7641 6000)

Westminster's Local Authority Designated Officer (who deals with allegations against staff working in schools):

Westminster City Council Duty Team: Gourita Gibbs, John Griffin, Gabby Bernard

E: lado@westminster.gov.uk

T: 020 7641 7668

Westminster Prevent Team:

Kiran Malik

E: prevent@westminster.gov.uk

T: 020 7641 5071

Advice can be sought at any time from the NSPCC helpline:

E: help@nspcc.org.uk

T: 0808 800 5000

Key school personnel

Head Master:

Patrick Derham

E: patrick.derham@westminster.org.uk

T: 020 7963 1042

Chairman of Governors:

The Very Reverend Dr David Hoyle

E: chairofgovernors@westminster.org.uk

The School Counsellor:

Dermot Reilly

E: dermot.reilly@westminster.org.uk

T: 020 7963 1099

M: 07412 477828

Independent Listener:

The Reverend Mark Birch

E: mark.birch@westminster-abbey.org.uk

T: 020 7654 4968

¹ From 28 September 2019, the Local Safeguarding Boards (Hammersmith & Fulham Council, Royal Borough of Kensington and Chelsea and Westminster City Council), Central West Basic Command Unit (Police) and the Clinical Commissioning Groups were constituted as the LSCP.

CONTENTS

POLICY ON SAFEGUARDING	2
CONTACTS	2
School safeguarding personnel	2
External safeguarding contact details	3
Key school personnel	3
INTRODUCTION	6
Vision	6
Overview	6
Definition: Safeguarding	7
Definition: A Child	7
Contextual Safeguarding	7
Terms of reference – External documentation	8
Terms of reference – Internal documentation	8
Data protection	8
The Designated Safeguarding Lead and Deputies	9
UNDERTAKINGS	10
Principles	10
Recruitment	10
Training	11
Communications and sharing information internally	12
Communications and sharing information externally	13
CONTEXTUAL CHALLENGES	14
Children with Special Educational Needs and Disabilities (SEND)	14
Looked After Children (LACs)	14
CHILDREN AT RISK OF SIGNIFICANT HARM ABUSE AND NEGLECT (LEVEL FOUR)	15
Physical abuse	15
Emotional abuse	16
Sexual abuse and Child Sexual Exploitation (CSE)	17
Neglect	18
Children Missing from Education (CME)	19
Radicalisation and preventing extremism	19
Honour-based Violence (HBV) including	20
Female Genital Mutilation (FGM) and Forced Marriage	20
Peer on peer abuse	21
Child on child sexual violence and sexual harassment	23
Sexting (Youth Produced Sexual Imagery [YPSI])	24
Online Safety	25
Domestic violence	25
Self-harm	25
Serious violence	25
Serious bullying	27
Gangs and child criminal exploitation (County Lines)	27
Other actions to cause concern	27
CHILDREN IN NEED (LEVEL THREE)	28
EARLY HELP PLANS (LEVEL TWO)	29
INDIVIDUAL WELFARE PLANS (LEVEL ONE)	30
CONCERNS ABOUT / ALLEGATIONS AGAINST MEMBERS OF STAFF	31

<i>Informing others about concerns</i>	31
<i>Handling concerns</i>	32
<i>Support for Staff</i>	33
<i>Suspension</i>	33
<i>Record-keeping</i>	34
<i>Following up</i>	34
<i>Historic cases</i>	35
THE MANAGEMENT OF SAFEGUARDING AND CHILD PROTECTION	36
<i>Record keeping</i>	36
<i>General principles</i>	36
<i>Procedure for staff dealing with abuse (including peer on peer abuse)</i>	37
<i>Early Help</i>	37
<i>Children in need or who are at risk of significant harm or in immediate danger</i>	38
<i>Whistleblowing</i>	39
<i>Monitoring, evaluation and review</i>	40
APPENDIX A	41
<i>Child protection procedures</i>	41
APPENDIX B	42
<i>Flowchart of when and how to share information</i>	42
APPENDIX C	43
<i>Actions where there are concerns about a child</i>	43
APPENDIX D	44
<i>If you have a concern</i>	44
APPENDIX E	45
<i>Peer on peer abuse</i>	45
APPENDIX F	48
COVID-19	48
Context	48
Principles	48
Contact details	48
Vulnerable children	49
Registration and attendance	49
Staff absence	50
Home School and Hub School safeguarding arrangements	50
Reporting a concern	50
Safeguarding training	51
Safer recruitment / Volunteers	51
Online safety through School systems and in School	52
Online safety away from School	52
Staff Code of Conduct	52
Expectations of households where pupils are working	53
Supporting children when they are not in School	53
Promoting HM Government advice	54
Peer on peer abuse	54
APPENDIX G	55
COVID-19	55
Context	55
Face-to-face engagement with pupils	55
Handling concerns	55
Sharing information	55

INTRODUCTION

Vision

Westminster School seeks to provide a safe and nurturing academic environment: the School is utterly committed to the welfare of all members of its community such that they might grow and flourish.

The principle of safeguarding its pupils is an essential part of the School's very foundation and we encourage everyone to live out those values within the School's environment and beyond it.

In particular, all members of the community are expected to be alert to the predicaments and needs of others, as well as being in support of one another at all times.

To that end, whilst policies regulate our activities, we expect to work beyond that, so as to contextualise these things within the School's broader ethos.

Overview

Westminster School ("the School"), makes its Safeguarding Policy available to anyone. Members of staff are required to read it and the School ensures that it is fully implemented.

The policy is updated annually, or more frequently if required (e.g.: where there is a change in legislation). It is provided to all staff and published on the staff intranet. The policy is made available to children and parents on the School's website.

This policy applies to all individuals working in or for the School including all teaching and non-teaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to "staff" in this policy should be interpreted as relating to the aforementioned unless otherwise stated. This policy will also apply to parents of pupils, when they are in the School Precincts or otherwise involved with school business. It also applies to those who are household members and visitors of resident staff who are accommodated in any buildings used to accommodate pupils overnight or who are resident in accommodation that is linked to a School building where pupils may be.

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

The School also works to create an environment where pupils, parents and staff feel able to raise concerns and where staff feel supported in their safeguarding role.

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

Definition: Safeguarding

Safeguarding and promoting the welfare of children is defined as:

1. Protecting children from maltreatment
2. Preventing impairment of children's health or development
3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes.

Definition: A Child

In English law, a child is "anyone who has not reached his or her 18th birthday". The School extends the same level of pastoral care to pupils over 18, but recognises that they have a different legal status.

Contextual Safeguarding

The School acknowledges that abuse can happen in any organisation and in many different contexts. As such, the School also understands the value of Contextual Safeguarding.

Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families and the School setting. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore we recognise that we need to engage with individuals and sectors who do have influence over or within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Therefore, we seek to expand the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts.

Terms of reference – External documentation

This policy complies with the following key documents:

- *Keeping Children Safe in Education* (HM Government, September 2019)
- *Working Together to Safeguard Children* (HM Government, July 2018)
- *Independent School Standards Regulations* (HM Government, 2014)
- *Safeguarding children and young people* (Charity Commission Policy Paper, July 2014)
- *What to do if you're worried a child is being abused: advice for practitioners* (HM Government, March 2015)
- *Boarding Schools: National Minimum Standards* (HM Government, April 2015)
- *Prevent Duty Guidance for England and Wales* (HM Government, July 2015)
- *Children Missing Education* (HM Government, September 2016)
- *Sexual Violence and Sexual Harassment between Children in Schools or Colleges* (HM Government, May 2018)
- *Handbook for the Inspection of Schools: Commentary on the Regulatory Requirements* (Independent Schools Inspectorate, September 2019)
- *Teaching Online Safety in Schools* (HM Government, June 2019)

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

Terms of reference – Internal documentation

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

- Accommodation policy
- Anti-bullying policy
- Behaviour, rewards and sanctions policy
- Code of conduct for staff
- Data protection policy
- Equal opportunities policy
- E-safety policy
- Physical contact and physical restraint policy
- Pupil registration and attendance policy
- Recruitment policy
- Risk assessment policy
- Whistle blowing policy

Data protection

Written safeguarding records count as “sensitive personal data” under the *General Data Protection Regulation and Data Protection Act* (HM Government, 2018): they neither prevent nor limit the sharing of information for the purposes of keeping children and young people safe. As such, there is not a barrier to sharing information, and the duty to safeguard children overrides data protection obligations; however, parents who ask to see records may be allowed access, provided this does not put children at risk and that any questions of the child’s consent are satisfied.

The Designated Safeguarding Lead and Deputies

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

There are also three Deputy DSLs appointed who are trained to the same level as the DSL and can act appropriately when safeguarding issues arise if the DSL is unavailable.

During term time the DSL or a Deputy DSL will always be in School during school hours, or at least immediately contactable. Outside of school hours they will be available by telephone if not in School. The details of all members of this Safeguarding Team are on the first page of this policy. If, in exceptional circumstances, the DSL or a Deputy DSL are not available, this should not delay appropriate action being taken: staff should consider speaking to a member of the Senior Management Committee and / or take advice from Children's Social Services. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

While the DSL can delegate some safeguarding responsibilities to the deputies, the ultimate responsibility for safeguarding lies with the DSL. Annex B of *KCSIE 2019* outlines the duties of the DSL (including e-safety), which are also set out in the DSL's job description.

UNDERTAKINGS

Principles

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

To this end, the School will support every pupil's development in ways that will foster their sense of security, confidence and independence, and in a manner that has respect for the dignity, privacy and beliefs of all, and which does not discriminate on the basis of gender, ethnicity, beliefs, race, culture, religion, caste, sexual orientation or disability. Further details are outlined in the Behaviour, Rewards and Sanctions Policy which is available to all members of staff.

The School recognises that the welfare of the child is paramount. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs; all children without exception have the right to protection from abuse.

Recruitment

The School will comply fully with the government's published policies on safer recruitment, making the appropriate checks on all staff (including governors, employees, volunteers and contractors), including through the Disclosure and Barring Service (DBS) and by obtaining and following up thorough references.

Assurance is obtained that appropriate suitability checks apply to any staff employed by another organisation who might be working onsite (such as building or service contractors) and to any individual working with the School's pupils (such as Societies or Station) or on an external site (such as on school visits or Expeditions). Any individual working on our own site, and / or off-site with our pupils, for whom an enhanced DBS check with barred list has not been obtained, will not be allowed to work in regulated activity and will be supervised by our staff at all times.

The School's safer recruitment procedures are set out in full in the School's Safer Recruitment Policy. These comply with Part 3 of *KCSIE* (September 2019), the *Safeguarding Vulnerable Groups Act* (HM Government, 2003) and other relevant safer recruitment guidance to ensure that no-one is employed within, by or on behalf of the School who is unsuitable to work with children.

Training

The School trains all staff, regardless of their role, to be vigilant and watchful for, and aware of, signs that a child may be in need of help, as well as the signs of abuse and neglect (see Appendix A).

To this end, all staff members receive appropriate safeguarding and child protection training which is regularly updated in line with the Tri-Borough LSCP's guidance. In addition, all staff members receive safeguarding and child protection updates (via email and staff meetings) as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff.

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- (i) This policy;
- (ii) *Keeping Children Safe in Education* (September 2019) Part 1 – and Annex A for school leaders and those who work directly with children;
- (iii) Code of Conduct for Staff;
- (iv) *What to do if you're worried a child is being abused – advice for practitioners* (March 2015);
- (v) Whistleblowing Policy;
- (vi) Behaviour, Rewards and Sanctions Policy;
- (vii) Safeguarding response to children who go missing from education;
- (viii) The role of the DSL.

Staff are expected to sign to note they have read and understood the relevant sections of *KCSIE*; this policy; the Code of Conduct for Staff; the Behaviour, Rewards and Sanctions Policy; and the Whistleblowing Policy.

The training for all Staff will cover a number of aspects, including but not limited to:

- (i) Part 1 of *KCSIE* (and Annex A for adults working directly with children), this policy and the Code of Conduct
- (ii) the signs that a child may be in need of early help or additional support, at risk of harm or suffering from harm
- (iii) indicators of abuse and neglect and specific safeguarding issues
- (iv) what to do if a child discloses abuse, including that confidentiality should never be promised and to avoid asking leading questions
- (v) how to escalate concerns about a child and allegations of abuse
- (vi) inter-agency working, including in the context of a referral made to Children's Social Services and / or the LADO, the statutory assessment process and that the staff member may be asked to contribute to a child protection strategy meeting
- (vii) early help
- (viii) peer on peer abuse
- (ix) online safety
- (x) information sharing
- (xi) guidance for all staff on boundaries and appropriate behaviour, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on)
- (xii) the existence and whereabouts of this policy, other relevant policies and safeguarding documentation including local authority procedures.

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

Communications and sharing information internally

The School emphasises the need for good levels of communication between all members of staff to ensure that a structured procedure for the safeguarding of children will be followed in cases of suspected abuse (see Appendix C below.) The School recognises the importance of information sharing in protecting children from harm and promoting children's wellbeing (the danger of not sharing information is highlighted in a number of serious case reviews). The School shares information in accordance with the *General Data Protection Regulations* (May 2018) and the guidance set out in Chapter 1 of *Working Together to Safeguard Children* (July 2018) and in *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* (July 2018).

The School recognises that it plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults within an ethos built upon care, support and protection. To this end, all pupils (and members of staff) will have access to the document 'If You Have A Concern' which sets out who can be contacted if pupils are worried or in difficulty. This document is also discussed in Wellbeing lessons or tutorials with all new pupils, and reprinted as Appendix D below.

The DSL is trained on the above guidance and works with staff to ensure that:

- a) Fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children;
- b) They understand and follow this guidance; and
- c) They feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.

The School provides a systematic means of identifying and supporting all children who are suspected of being in need of early help or additional support, or at risk from harm, and of handling such cases appropriately in line with the procedures set out below.

The School will train those pupils in a position of pastoral responsibility, e.g.: School Monitors, Heads of House and Peer Supporters in basic safeguarding procedures. They will have clear guidance through their training that their role is to listen, not to investigate and not to 'keep secrets' but to refer the matter if they receive any allegations of abuse.

Within the School's Wellbeing programme, during tutorials and assemblies, and elsewhere in the curriculum, pupils are taught key safeguarding issues including but not limited to:

- Safety online (see the [Policy on e-Safety](#))
- The dangers of radicalisation (within the Religious Studies curriculum)
- Issues surrounding consent to sexual acts.

The School will ensure full written records of all child protection procedures are maintained and stored confidentially. All concerns, disclosures or allegations, decisions and subsequent actions will be recorded securely and confidentially. All discussions, the decisions made and the reasons for these decisions will be recorded.

Communications and sharing information externally

Where pupils move to new schools, their child protection files will be transferred securely, separately from the main file, and a confirmation of receipt will be requested. The retention and destruction of files will be in accordance with the School's Data Protection Policy.

The School follows the inter-agency and child protection procedures laid down by the Tri-Borough LSCP, including but not limited to their threshold document and assessment procedures. The School is fully committed to inter-agency working in line with statutory guidance and this forms part of DSL and staff training. We work with all external agencies in the best interests of the child, including the local Police and Children's Social Services, who will be approached for advice and referral. Information will be shared securely with other professionals and local agencies.

CONTEXTUAL CHALLENGES

Children with Special Educational Needs and Disabilities (SEND)

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

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

The Study Skills Department works with these pupils and helps to identify such barriers; the staff there provide another opportunity, in addition to those available to all pupils, for these children to raise safeguarding concerns.

Looked After Children (LACs)

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

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

CHILDREN AT RISK OF SIGNIFICANT HARM ABUSE AND NEGLECT (LEVEL FOUR)

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

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

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

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

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

Physical abuse

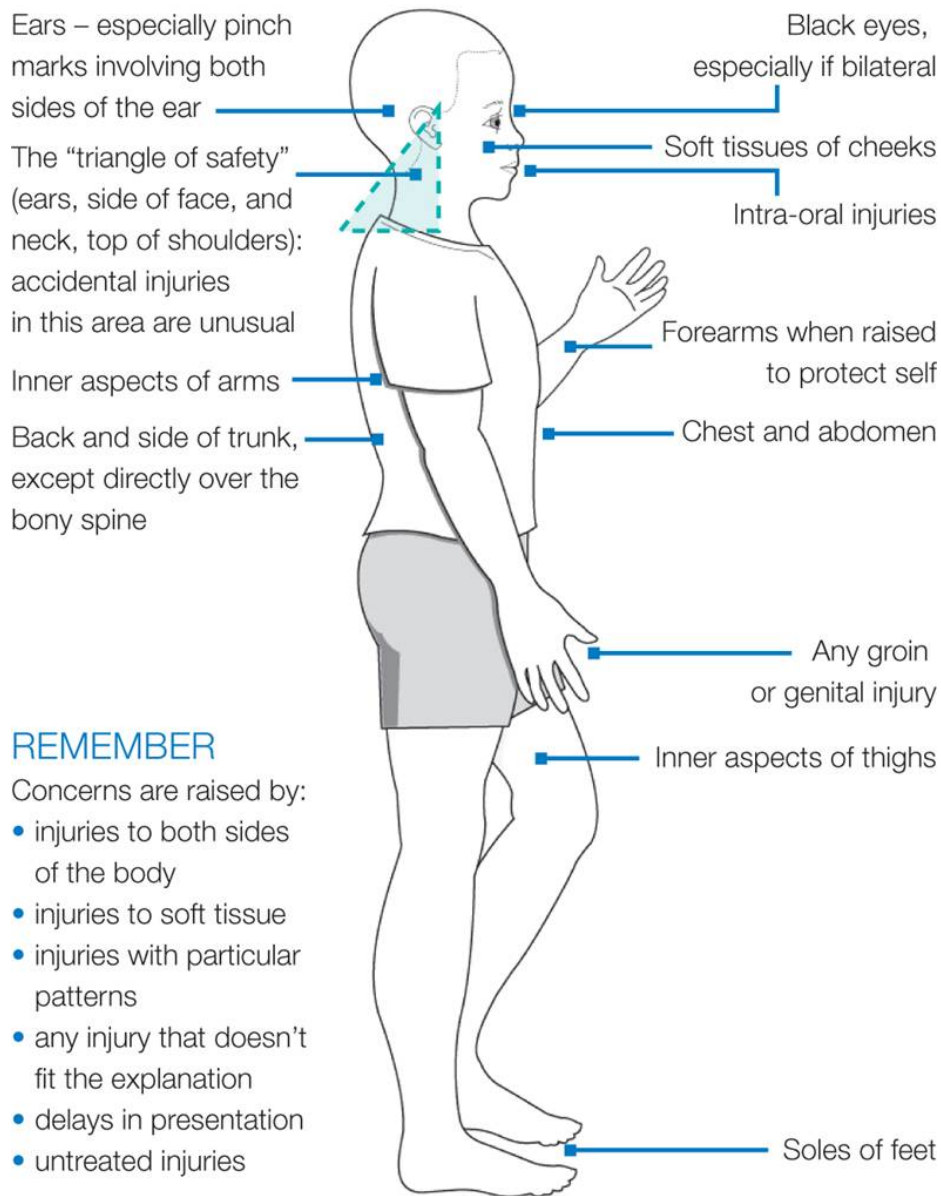
Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

INDICATORS

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

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

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



Emotional abuse

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

INDICATORS

Children:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Lack of confidence / self-esteem;
- Sudden speech disorders;
- Self-harming;
- Extremes of passivity and / or aggression;
- Compulsive stealing;
- Drug, alcohol, solvent abuse;
- Fear of parents being contacted;
- Unwillingness or inability to play; and
- Excessive need for approval, attention and affection.

Parents or carers:

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

Sexual abuse and Child Sexual Exploitation (CSE)

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

INDICATORS

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you would not expect them to have;
- Children who ask others to behave sexually or play sexual games;
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy;
- Children who have sudden changes in behaviour and school performance;
- Children who self-harm, self-mutilation or attempts at suicide;
- Children who allude to secrets which they cannot reveal;
- Children who have a tendency to cling or need constant reassurance; and
- Children with a fear of undressing for gym activities.

Child Sexual Exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

INDICATORS

- Children who appear with unexplained gifts, money or new possessions;
- Children who associate with other young people involved in exploitation; Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education; and
- Children who present with depression or are withdrawn.

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

Neglect

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

INDICATORS

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g.: not having a winter coat;
- Children who are living in dangerous conditions, i.e.: around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care;
- Parents who fail to seek medical treatment when their children are ill or are injured;
- Children who have poor personal hygiene;
- Children who are frequently tired;
- Children who are frequently late / non-attendance at school;
- Children who have a poor relationship with peers;

- Children who are compulsively stealing and scavenging;
- Children who run away;
- Children with a loss of weight / being constantly underweight ;
- Children who have low self esteem; and
- Children with poor dental hygiene.

Children Missing from Education (CME)

The School understands its duty, as explained in *KCSIE*, in relation to the risks posed by Children Missing from Education. All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any Special Educational Needs they may have. A child going missing from education is a potential indicator of a range of safeguarding risks, including abuse and neglect, and other issues.

The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School's list under the circumstances outlined in *KCSIE*. All staff must also be aware of their role to prevent children from going missing from education.

In the short-term, the School will take appropriate action to find any pupil (either day or boarding) who is discovered to be missing from the School during the registration process; the Under Master should normally be informed in the first instance and will coordinate the action taken. A written record is made of any incident of a pupil missing from the School, the action taken, and any reasons given by the pupil for being missing.

For longer term absence, the School will ensure that any pupil currently on the Child Protection Register who is absent without explanation for two days is referred to Children's Social Services.

For further details of the School's procedures and responses please see the [Pupil Registration and Attendance Policy](#) which is available to all staff. This contains the School's procedures for unauthorised absence, including on repeat occasions, as well as referral to the Local Authority.

Radicalisation and preventing extremism

It is the School's duty (the Prevent duty) to have due regard to the need to prevent pupils from being radicalised and / or drawn into terrorism. It recognises that during the radicalisation process it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer to their psychological or emotional problems. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

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

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

- The School will work in partnership with parents and with other agencies, including Police, LCSB / LSCP and the Westminster City Prevent and Channel teams.
- The DSL will attend Prevent awareness training and provide advice to other members of staff.
- The School will help young people stay safe online through appropriate filters (see the [E-Safety Policy](#)).
- The weekly list of visiting speakers to the School will be vetted by the Under Master in order to prevent extremist views being expressed without challenge. Internal speakers at school societies – and the subjects of their intended talks will also be monitored by the Deputy Head (Co-curricular).
- The School will work more generally to ensure the Fundamental British Values of democracy, rule of law and acceptance of others are celebrated, modelled and are not undermined.

INDICATORS

- A conviction that their religion, culture or beliefs are under threat and treated unjustly;
- A tendency to look for conspiracy theories, and a distrust of mainstream media;
- A sense of debt or guilt;
- Blaming parents for family problems;
- Feeling let down, and perhaps 'religious seeking';
- Peer pressure, low self-esteem, and/or the need for identity and belonging;
- Physical change / growth spurt (being bigger than peers);
- Being secretive about who they have been talking to online and what sites they visit;
- Switching screens when you come near the phone, tablet or computer;
- Possessing items – electronic devices or phones – you have not given them; and
- Becoming emotionally volatile.

<p style="text-align: center;">Honour-based Violence (HBV) including Female Genital Mutilation (FGM) and Forced Marriage</p>

Honour-based violence (HBV) encompasses crimes that have been committed to protect or defend the honour of the family and / or community. Female Genital Mutilation (FGM) and forced marriage are examples of such. All forms of HBV are abuse (regardless of motivation) and should be handled and escalated as such. It should be noted that such abuse can often involve a wider network of family and community that can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of *Multi-agency statutory guidance on female genital mutilation* (April 2016); Chapter 9 focuses on the role of schools to which the School has due regard.

Whilst all Staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police. Those failing to report such cases to the Police will face disciplinary sanctions. Unless the teacher has good reason not to, they should still consider and discuss the case with the DSL to involve Children's Social Services as appropriate. This duty does not apply where a teacher merely *suspects* that an act of FGM may have been carried out or that a girl may be at risk of FGM. In all at risk or suspected cases and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL immediately. Any non-teaching staff with concerns about FGM should also report their concerns to the DSL immediately.

Peer on peer abuse

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

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

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Sexting (also known as youth produced sexual imagery);
- Upskirting; and
- Initiation / hazing type violence and rituals.

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

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

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

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

INDICATORS

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect;
- Physical injuries;
- Having difficulties with mental health and / or emotional wellbeing;
- Becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much;
- Drugs and / or alcohol use;
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- Children who have:
 - (i) witnessed or experienced abuse or violence themselves;
 - (ii) suffered from the loss of a close family member or friend; or
 - (iii) experienced considerable disruption in their lives.

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

For further information on peer on peer abuse, see Appendix E.

Child on child sexual violence and sexual harassment

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

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

Reports should be managed in accordance with good practice. Staff should always discuss concerns about sexually harmful behaviour involving pupils with the DSL. It is important that sexual violence and sexual harassment are shown to be unacceptable, and not passed off as “banter” or “part of growing up”.

Where an incident between two pupils takes place away from the School, the School’s safeguarding duties remain the same. The School will take reasonable measure to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media.

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

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

Engagement with specialist services will then be required.

Careful consideration will be given to:

- The wishes of the victim in terms of how they want to proceed;
- Any investigation will be progressed and any support that they might need will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or Staff; and
- Other related issues and wider context.

While the facts are being established, the School will remove the alleged perpetrator from any classes shared with the victim, and consider how best to keep them at a reasonable distance apart, in the best interests of both children. Careful consideration will be given as to when to inform the alleged perpetrator, and this may be discussed with relevant agencies.

Consideration, with the support of professionals, will be given as to how the matter will be handled. There are four likely routes to be considered when managing a report of sexual violence or sexual harassment:

1. Managing internally: in some cases of sexual harassment (such as one-off incidents) a school may be allowed to manage the incident internally;
2. Early help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
3. Referrals to Children’s Social Services: in cases where there has been harm, or there is an immediate risk, a referral should be made to Children’s Social Services;

4. Reporting to the Police: in cases where rape, assault by penetration or sexual assault is reported the School will not wait for the outcome of a Police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that the School's actions do not jeopardise the Police investigation. If a child is convicted or cautioned, the School will update the risk assessment and consider suitable action through their behaviour policy.

It is important to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child is found not guilty, the School will continue to support the victim and perpetrator.

The School recognises that in cases where the Police choose to take no further action the School will continue to engage with specialist support for the victim. It is also acknowledged that, when a child abuses another child, they may themselves have been a victim of abuse and the need to support the alleged perpetrator will be emphasised.

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

Some situations are statutorily very clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. The School recognises that consent means "freedom and capacity to choose" and this definition is addressed in the School's curriculum when appropriate.

Sexting (Youth Produced Sexual Imagery [YPSI])

Sexting is defined here as "sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet". Creating and sharing sexual photos and videos of under-18s is illegal. When an incident involving sexting comes to the School's attention, the incident should be referred to the DSL as soon as possible such that an initial review meeting with appropriate School staff can be held before subsequent 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. The UKCCIS guidance will be followed.

In particular, members of staff who suspect that a sexualised image of a child is contained on an electronic device should not ask to view the image.

At any point in the process, if there is a concern a young person is in need or at risk of harm, a referral should be made to Children's Social Services and / or the Police immediately, in accordance with the procedures set out in this policy.

Online Safety

Safeguarding of children extends to the online environment. All Staff should be aware of the risks posed to children by technology and the internet, and should understand their role in preventing, identifying and responding to harm caused by its use. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

There is a separate E-Safety Policy: the School has adopted a whole-school approach to online safety which captures the range and complexity of the risks and of children's experiences of those risks; seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and handles all cases of online harm appropriately and with sensitivity. In particular, this policy sets out the risks posed to children by the internet and technology, the indicators that a child may be at risk of such harm, and the measures taken by the School to mitigate these risks, including pupil and parent education, staff training, and limiting the risk of harm caused by the School's IT systems (e.g.: appropriate filters). Further to this, it includes reference to the use of mobile technologies, including the management of access to 3G / 4G through mobile devices.

Domestic violence

Domestic Violence is a safeguarding issue and children and young people are at risk and also vulnerable in terms of keeping themselves safe from others. Young people can be affected in the following ways:

- Psychologically
- Physically
- Sexually
- Financially
- Emotionally

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

Self-harm

This includes pupils deliberately cutting their own skin, eating disorders and substance abuse.

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

Serious violence

This involves pupils being at risk from or involved with serious violent crime, such that they are at risk from harm and exploitation.

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

Serious bullying

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

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

Gangs and child criminal exploitation (County Lines)

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

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

- Can still be exploitation even if the activity appears consensual;
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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

Other actions to cause concern

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

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

CHILDREN IN NEED (LEVEL THREE)

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

INDICATORS:

Children

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

Parents or carers

- A family experiencing a crisis which may result in breakdown of care;
- Parents separated, with conflict over contact (child may be used as a pawn);
- Parents are inconsistent in their attachment to child: child is rarely comforted or encouraged;
- Supervision of child is sometimes unsafe;
- Parents sometimes use inappropriate caregivers;
- Parents struggle to provide for child's basic physical or emotional needs as a result of mental health or disability issues, substance misuse (including alcohol) or domestic abuse; and
- Parents frequently put their own needs above those of child.

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

EARLY HELP PLANS (LEVEL TWO)

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

INDICATORS:

Children

- A disability or physical illness which requires some support;
- Newly arrived in the UK;
- Slight speech or language issues;
- Missing routine health appointments;
- Missing some immunisations;
- Slow physical development;
- Minor dietary issues;
- Minor mental health issues emerging;
- Exploring alcohol abuse or low-level drugs relationships;
- Gang involvement and association with organised crime groups;
- Clothing and / or personal hygiene raise low-level concerns;
- School attendance is low (85%-94%);
- Special Educational Needs;
- Struggling academically;
- Escalating behaviour issues;
- Questioning self-worth;
- Has some caring responsibilities in family;
- At risk of modern slavery, trafficking or exploitation;
- At risk of being radicalised;
- Has returned home to their family from care; and
- Is privately fostered.

Parents or carers

- Family relationships are strained;
- Family are experiencing issues such as bereavement or divorce;
- Parents are experiencing parenting challenges;
- Parental supervision raises low-level concerns;
- Parents are over-protective; and
- Parents do not provide a safe context (drug and alcohol misuse, mental health issues, domestic abuse).

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

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

INDIVIDUAL WELFARE PLANS (LEVEL ONE)

Many of pupils will have temporary issues to do with:

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

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

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

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

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

CONCERNS ABOUT / ALLEGATIONS AGAINST MEMBERS OF STAFF

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

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

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

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

Informing others about concerns

Any such **concerns or allegations about an adult in the School** (or those working with the pupils outside of the School) should be reported to the Head Master immediately. Staff or pupils may discuss their concern with the DSL and the DSL will then refer it to the Head Master immediately.

The adult to whom the concern or allegation (referred to hereafter as allegation) relates should *not* be informed.

If **the allegation is about the DSL**, then the Head Master will need to be informed directly, without informing the DSL.

If **the allegation is about the Head Master**, staff must immediately inform the Chair of the Governing Body (or, in his absence, the Governor with Responsibility for Safeguarding) without informing the Head Master.

The Head Master (or the Chair of the Governing Body in cases of allegations against the Head Master) will inform the LADO of all allegations if he believes that a member of staff has behaved in a way which meets the criteria above as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. If it is suspected that a crime has been committed, the Police will be informed, and then the LADO.

The Head Master will normally discuss all allegations with the DSL unless it relates to the DSL. Borderline cases will be discussed without identifying individuals in the first instance.

Handling concerns

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

The LADO will discuss with the Head Master (or Chairman as above), and any other relevant agencies such as the Police, which further steps (if any) should be taken; this could involve informing parents.

Where a referral to the Police has been made directly, the Head Master (or Chairman) will inform the LADO of the referral as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. There may be cases where the LADO or Police are made aware of an allegation before the School is and in those cases they will notify the School of the allegation immediately. All discussions with external agencies should be recorded in writing.

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

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

The person against whom an allegation is made should normally be informed as soon as possible after the result of the initial investigation is known. However where a strategy discussion is needed or Police or Children’s Social Services need to be involved, the person against whom the allegation has been made should not be informed until these agencies have been consulted.

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

Support for Staff

The School recognises that Staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. Accordingly, the School will support such Staff by providing an opportunity to talk through their anxieties with the DSL, School Counsellor or Chaplain. Similarly, during any protracted procedure arising from claims of abuse, the School Counsellor and the Chaplain may be able to offer confidential support to the member of staff. Members of staff also have access to the School's Employee Assistance Programme.

Suspension

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person, then the person concerned will be suspended. Due weight should be given to the views of the LADO and to the Police when making a decision about suspension and all alternative options should be considered prior to taking that step.

The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff, the matter will normally be dealt with in accordance with the Staff Disciplinary Procedure. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School, it will be necessary to suspend that person from teaching immediately, pending the findings of the investigation by the Teaching Regulation Agency.

In the case of a concern about or an allegation being made against a member of the resident boarding staff, if a suspension from work is deemed appropriate while an investigation takes place, that member of staff will be temporarily rehoused in accommodation that is not within that (or any other) boarding house. Further information can be found in the [Accommodation Policy](#).

Outcomes

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

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

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

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

Record-keeping

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

Allegations that are found to have been (1) malicious will be removed from personnel records and the person against whom the complaint has been made will be informed that the matter is closed.

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

Following up

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

If it is established that the allegation is (2) false, (3) unsubstantiated or (5) unfounded, a written record will be made of the decision and the justification for it and then the person against whom the complaint has been made would normally be informed that the matter is closed.

If the allegation is (4) substantiated and the member of staff (whether employed, contracted, a volunteer or a student) resigns or is asked to leave the School, or would have been removed had they not left, on the grounds that they:

- Have harmed (or pose a risk of harm) to a child or vulnerable adult; or
- Have received a caution or conviction for a relevant offence; or
- Are reasonably believed to have committed a listed relevant offence; or
- Have been removed from working (paid or unpaid) in regulated activity.

then the Head Master will (as soon as possible after the person has resigned or the School has ceased to use his/her services) notify the Disclosure and Barring Service at PO Box 101, Darlington DL1 9FA (01325 953795). DBS guidance is given in <http://www.homeoffice.gov.uk/dbs>.

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

For teachers, separate consideration will be given as to whether to refer the matter to the Teaching Regulation Agency in order to consider prohibiting the individual from teaching (this includes cases where they would have been dismissed if they had not resigned): the Headmaster, consulting the LADO, will consider whether or not to refer the matter to the Teaching Regulation Agency. The Teaching Regulation Agency may impose a prohibition order to prevent teachers from working in the profession following a finding of:

- Unacceptable professional conduct;
- Conduct that may bring the profession into disrepute; or
- Conviction, at any time, for a relevant offence.

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

Historic cases

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

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

THE MANAGEMENT OF SAFEGUARDING AND CHILD PROTECTION

Record keeping

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

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

General principles

See Appendices A, B, C and D.

NECESSARY AND PROPORTIONATE

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

RELEVANT

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

ADEQUATE

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

ACCURATE

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

TIMELY

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

SECURE

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

RECORD

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

Procedure for staff dealing with abuse (including peer on peer abuse)

If a staff member has any concerns about a child, then they should discuss these with the DSL. The DSL will decide on an appropriate course of action. This discussion and actions taken will be recorded. The flow chart in Appendix A, Actions where there are concerns about a child, provides a guide to the process.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision for both victim and perpetrator.

Options include:

- Managing any support for the child internally via the School's own pastoral support processes;
- An early help assessment; or
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

Early Help

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

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

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

Where a child and family would benefit from coordinated support from more than one agency (e.g.: education, health, Police) there should be an inter-agency early help assessment – such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. If Early Help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment as appropriate.

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

For an early help assessment to be effective:

- It should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them;
- A teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority;
- If parents and / or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to Children's Social Services may be necessary.

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

Children in need or who are at risk of significant harm or in immediate danger

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to Children's Social Services – in the local authority where the child lives and in accordance with the threshold document published by the relevant LSCP or equivalent.

If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Services and / or the Police immediately.

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

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

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

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

It is not a requirement for parental consent to have been given for a referral to be made to a statutory agency.

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

Whistleblowing

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

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

- Guidance can be found at - <https://www.gov.uk/whistleblowing>
- The NSPCC Whistleblowing Advice Line is available for adults who do not feel able to raise concerns regarding child protection failures internally.
E: help@nspcc.org.uk
T: 0800 028 0285 – line is available from 08h00 to 20h00, Monday to Friday
A: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH.

Monitoring, evaluation and review

As proprietor, the Governing Body has ultimate responsibility for safeguarding and for the leadership of high quality safeguarding within the School. A member of the Governing Body has leadership responsibility for the School's safeguarding arrangements and is responsible for overseeing safeguarding matters and procedures within the School. This is currently Jane Sinclair. This Governor receives regular safeguarding training, such that she has the necessary knowledge, skills and expertise for the role. The DSL reports regularly to this Governor responsible for safeguarding procedures and on particular causes for concern.

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

This policy is reviewed annually by the Governing Body, and updated more frequently as necessary by the DSL. The School regularly assesses the effectiveness of its safeguarding procedures as a whole – in a group including, amongst others, the Under Master, Deputy DSLs and other staff with significant pastoral responsibilities – and will seek to remedy any deficiencies without delay.

APPENDIX A

Child protection procedures

(issued to staff on a wallet-sized card)



WESTMINSTER SCHOOL SAFEGUARDING

2019-2020

PROCESS:	HOW TO REACT:	
<ul style="list-style-type: none"> • Receive • Reassure • Respond • Record • Report 	<ul style="list-style-type: none"> • Act professionally at all times. • Treat all pupils with respect. • Listen actively – TED: Tell, Explain, Describe. • Do not make a promise of confidentiality to pupils. 	<ul style="list-style-type: none"> • Do not exaggerate, trivialise or ignore child abuse (physical, sexual, emotional abuse, or neglect). • Report all concerns, however trivial: do not fail to report something about which you are concerned.

If you think a child is in immediate danger, or you believe a crime has been committed, ring the Police on 999.

WHAT TO DO IF...

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

- Report the matter immediately to the DSL or a Deputy DSL (or SMC if the DSLs are not available).
- Do not share your concerns with other adults or pupils.

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

- Report the matter immediately to the Head Master (Patrick Derham: patrick.derham@westminster.org.uk).
- If it is about the Head Master, report it to the Chair of Governors (chairofgovernors@westminster.org.uk).

Key contacts (Designated Safeguarding Leads – DSLs)

James Kazi, Under Master & DSL (07889 299075)

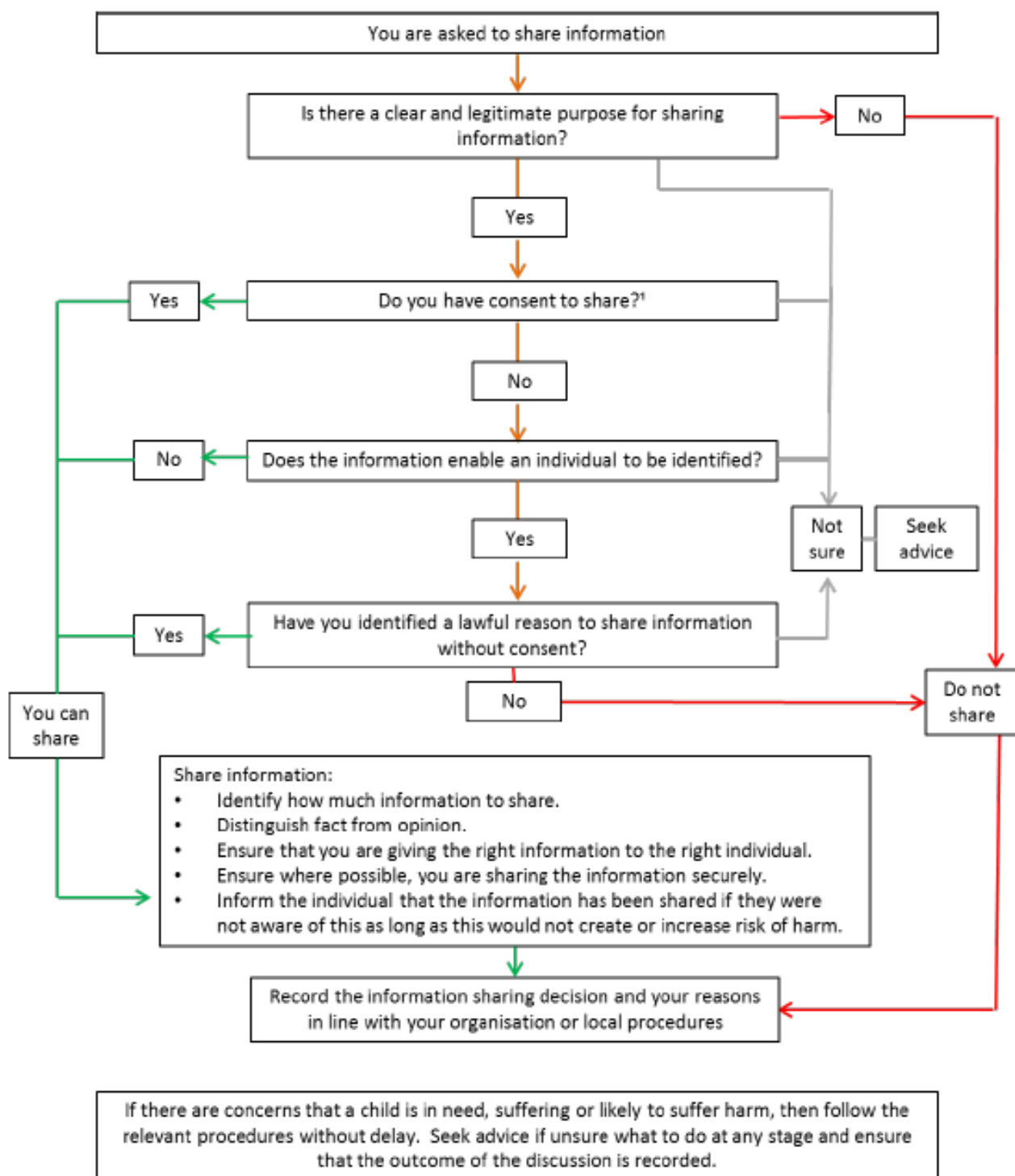
Jeremy Kemball, Deputy Head & Deputy DSL (07739 920381)

Clare Leech, Head of Upper School & Deputy DSL (07770 194648)

Gabrielle Ward-Smith, Housemaster & Deputy DSL (020 7667 1506)

APPENDIX B

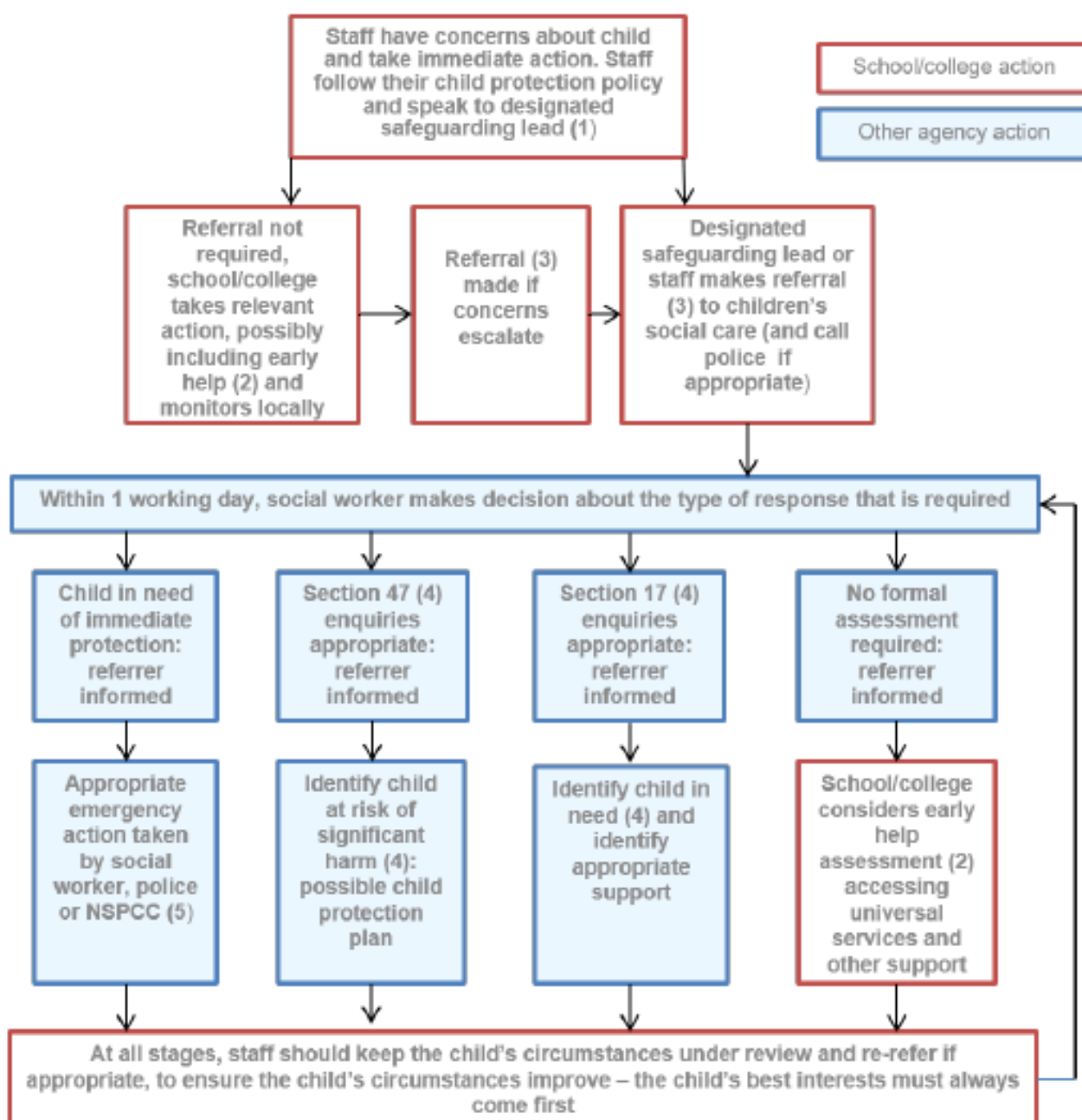
Flowchart of when and how to share information



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

APPENDIX C

Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) 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. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of [Working together to safeguard children](#).

(4) 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. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

APPENDIX D

If you have a concern

[published in the School Almanack and published on House notice boards.]

Most of the things that concern you at School are likely to be sorted out informally before they become major problems. We hope that you feel able to share any worries about work with your teachers and parents. There may, however, occasionally be other problems, which could require different treatment. For example:

- You may feel that you are being unfairly treated by a member of staff or a pupil;
- You may feel that you are the victim of verbal and / or physical abuse;
- You may have concerns for the welfare of another pupil.

It is important that you feel able to share concerns such as these with us so that, where necessary, we can work together to sort out any misunderstanding or to take remedial action.

HOW WE CAN HELP

If you have a concern, there are plenty of adults who would be happy to listen and give advice:

- Your Housemaster and House Tutor
- The School Nursing Sister or House Matron
- Any teacher you trust

There are also other pupils who might be able to offer advice, including:

- Heads of House, Peer Supporters and School Monitors.

You could also contact the following:

- The Under Master and Designated Safeguarding Lead, Mr James Kazi
- The Head of Boarding and Educational Partnerships and Deputy Designated Safeguarding Lead, Mr Jeremy Kemball
- The Head of Upper School and Deputy Designated Safeguarding Lead, Miss Clare Leech
- The Chaplain, The Revd Gavin Williams
- The Independent Listener, The Revd Christopher Stoltz on 07823 402 600

COUNSELLING

You may, of course, share your anxiety with the School Counsellor, Dermot Reilly, who can be contacted Monday to Friday on 020 7963 1099 (office) or after hours on 020 7732 3799.

For those pupils who would particularly wish to see a female counsellor, Dr Gabrielle Ward-Smith (Housemaster PP and Deputy Designated Safeguarding Lead) is available and can be emailed or contacted on 020 7963 1131.

OTHER AGENCIES

Other external agencies exist to support children experiencing difficulties:

- Westminster Children's Services Department – 020 7641 4000 (out of hours – 020 7641 6000)
- Office of the Children's Commissioner – 0800 528 0731 and <http://www.childrenscommissioner.gov.uk>
- Childline – 0800 1111
- Independent Schools Inspectorate – 020 7600 0100 and concerns@isi.net
- Young Minds – text YM to 85258
- Place2Be – text SHOUT to 85258

CONFIDENTIALITY

Your welfare, and that of other children, is always the paramount concern for the School. This means that any person with whom you may share your concerns is obliged to bring these to the attention of the relevant authorities if they view them to be sufficiently serious. You can be assured that once your concern is shared with the School, every effort will be made to work with you to sort it out swiftly and sensitively.

Under Master
September 2019

APPENDIX E

Peer on peer abuse

What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying)², relationship abuse³, domestic violence⁴, child sexual exploitation, youth and serious youth violence⁵, harmful sexual behaviour⁶, and gender-based violence⁷.

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

Sexting can but does not always constitute abusive behaviour.

What role does gender play?

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

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

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

How can I identify victims of Peer on Peer abuse?

By being alert to children's wellbeing and to signs of abuse. Signs that a child may be suffering from Peer on Peer abuse overlap with those relating to other types of abuse and include: (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional wellbeing; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

² Please see the School's anti-bullying policy.

³ <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

⁴ This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional.

⁵ Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

⁶ This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

⁷ This is violence that is directed against one gender as a result of their gender.

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

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

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

How prevalent is Peer on Peer abuse?

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

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

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

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

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

Pupils may make allegations about Peer on Peer abuse, just as members of staff may become aware of issues.

If a pupil makes an allegation, then this will be treated in the same way as any disclosure (see Appendix A for further information).

If a member of staff makes an allegation, the DSL will discuss the behaviour with the member of staff directly.

Regardless of the source of an allegation, the priority is to take any immediate steps to ensure the safety of the victim(s) or any other child.

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

- (a) taking any steps to ensure the safety and wellbeing of any children affected;
- (b) further investigation;
- (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services; and
- (d) a strategy meeting.

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

- Investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;

- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, he may also have considerable unmet needs and be at risk of harm himself.
- take into account the complexity of Peer on Peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including
 - (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his behaviour;
 - (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
 - (c) to ensure the safety and wellbeing of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the School;
- provide on-going support to victim(s) including by
 - (a) ensuring their immediate safety;
 - (b) responding promptly and appropriately to the abuse;
 - (c) assessing and addressing any unmet needs;
 - (d) following the procedures set out in the safeguarding policy (including where the child is in need of early help or statutory intervention);
 - (e) monitoring the child's wellbeing closely and ensuring that he receives on-going support from all relevant staff members (including the School Counsellor) within the School;
 - (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term;
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

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

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

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

APPENDIX F

COVID-19

In order to safeguard pupils during these unprecedented times the School is following the government guidance for school closures during COVID-19. This Appendix sits alongside the School's existing Safeguarding Policy.

Context

From Wednesday, 18 March 2020, Westminster parents were asked to keep their children at home or to arrange for children to be lodged with guardians.

From Wednesday, 22 April 2020, the children of key workers where it is strictly necessary for pupils not to be at home, will be hosted at Westminster Under School.

Principles

As far as is reasonably possible, Westminster will take a whole institution approach to safeguarding. This will allow us to satisfy ourselves that any new policies and processes in response to COVID-19 are not weakening our approach to safeguarding or undermining our Safeguarding Policy.

Whilst the way that we are currently operating in response to COVID-19 is fundamentally different to business as usual, a number of important safeguarding principles remain the same:

- The best interests of children will always continue to come first.
- If anyone has a safeguarding concern about any child then they should continue to act and to act immediately.
- A DSL or a DDSL will always be available and members of the SMC can continue to be consulted as and where necessary.
- It is essential that unsuitable people are not allowed to enter the children's workforce and / or gain access to children, which means that Safer Recruitment principles remain in place.
- Children should continue to be protected when they are online.

This Appendix to the School's Safeguarding Policy contains details of our individual safeguarding arrangements for the identified areas.

Contact details

The Safeguarding Team and SMC continue to remain available so as to be able to receive and respond to any concerns that might arise. This can be done by email, telephone or video call.

The Safeguarding Team continues to work alongside Children's Services and the LADO.

All members of the Safeguarding Team have access to the School site and any relevant files and documentation, should the need arise.

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who are subject to a Child Protection Plan, a Child in Need Plan and those who are looked after by the Local Authority. Westminster will continue to work with and support children's social workers to help protect vulnerable children.

The Head Master, DSL and DDSLs know who our most vulnerable children are: they also have the flexibility to offer support to those on the edge of receiving children's social care support. The School expects all pupils to attend the School remotely and, where it is deemed to be appropriate, will encourage our vulnerable children to attend physically. If the expectation is that a vulnerable pupil will attend the School physically, consideration will be given as to whether the pupil has any underlying health conditions that put them at risk and will be subject to the formal agreement with the child's social worker. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the School will explore the reasons for this directly with the parent following the advice set out by Public Health England. The School will ensure that all professionals (e.g.: social workers, SEND case workers, Early Help worker etc.) involved with these vulnerable children are fully informed around the current attendance of the child (attending School or not, either remotely or physically) and if not attending School, the arrangements that have been put in place around safeguarding the child.

Registration and attendance

The School will continue to record day-to-day and lesson-by-lesson attendance. Absences will be reported as is usual and any unexplained absences will be followed up.

Vulnerable children who are required to attend School every day whether physically or virtually (including Looked After Children, Children subject to a Child Protection Plan and Children subject to a Child in Need Plan) and who are absent, will result in the School contacting the relevant Children's Services and providing the following details:

- School name and DSL details
- Full name of child
- Date of birth of child
- When the child was last seen by School staff

The Department for Education has introduced a daily online attendance form to keep a record of children of key workers and vulnerable children who are attending School: (<https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings>). This allows for a record of attendance for safeguarding purposes and allows schools to provide accurate, up-to-date data to the department on the number of children taking up places. The Under Master's Secretary, who is the nominated member of staff responsible for recording pupil attendance, will complete and return the form daily.

Staff absence

If a member of staff is ill and needs to be absent for a School session, the line manager should be notified by 08h30; for teaching staff, the Under Master and the Under Master's Secretary should also be informed.

If there is to be a planned absence, authorisation should be sought by completing the relevant absence request form online.

These arrangements ensure that pupils can be properly registered and supervised.

Home School and Hub School safeguarding arrangements

Definitions

Home School: School which pupil normally attends.

Hub School: School which is physically open and children from other schools are attending: Westminster Under School and / or Harris Westminster Sixth Form.

Responsibilities

The Home School maintains responsibility for safeguarding children on roll.

The Home School must ensure that the Hub School has the contact details for their DSL. Each Home School DSL must have the contact details of the Hub School DSL.

Where there is a need to make a request for support to Children's Services or to contact an allocated social worker, the Home School DSL retains responsibility for these tasks with support from the Hub School.

It is important for the Home School to provide any relevant safeguarding information relating to individual pupils to the Hub School DSL and other staff on a need to know basis, including a daily record of attendance. Additionally, confirmation needs to be received from the Home School headteacher listing the staff that will be deployed and confirming that the relevant safer recruitment processes and checks have been carried out (DBS etc.).

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the School's Safeguarding Policy.

Where staff are concerned about an adult working with children in the School, they should continue to follow the normal procedures and notify the Head Master immediately or the Chair of Governors if the matter concerns the Head Master.

If there is an immediate concern or the relevant person is not available, then it is appropriate to contact the Local Authority and / or the Police.

Safeguarding training

All DSL refresher training has been suspended by the Local Authority and it is very unlikely to take place whilst there remains a threat of the COVID-19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2019). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child. Where there is an update to the School's Safeguarding Policy, it will be necessary for all members of staff to confirm that they have read and understood the School's revised Safeguarding Policy.

Where new staff are recruited, or new volunteers enter the School, they will continue to be provided with a safeguarding induction, but online rather than face-to-face.

If staff are deployed from another education or children's workforce setting, the School will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- The individual has been subject to an enhanced DBS and children's barred list check;
- There are no known concerns about the individual's suitability to work with children;
- There is no ongoing disciplinary investigation relating to that individual.

Upon arrival, they will be given a copy of the School's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

Safer recruitment / Volunteers

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the School will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in Part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where volunteers are deployed, we will continue to follow the checking and risk assessment process as set out in the relevant sections of KCSIE (2019). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The School will continue to follow its legal duty to refer to the DBS where appropriate, in line with advice from the LADO, anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

The School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as set out in the relevant section of KCSIE (2019) and the TRA's "Teacher misconduct advice for making a referral". During the COVID-19 period all referrals will be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that the School is aware, on any given day, which staff / volunteers will be in School, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the School will continue to keep the single central record (SCR) up

to date as outlined in the relevant section of KCSIE. The SCR can also be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

Online safety through School systems and in School

The School will continue to provide a safe environment, including when working online. This includes the use of appropriate filters and online monitoring systems applied to the School's online platforms, through which all School business must be conducted.

Where children are using computers in School, appropriate supervision will be in place.

The School will ensure that any use of online learning tools and systems is in line with privacy and GDPR requirements.

Online safety away from School

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. To report any such concerns, staff should continue to follow the process outlined in the School's Safeguarding Policy; where appropriate, referrals should still be made to Children's Services and, as required, the Police.

Pupils will be briefed on how to keep themselves safe when online, reporting matters to members of staff or using the following websites:

- Childline for support:
<https://www.childline.org.uk/>
- UK Safer Internet Centre to report and remove harmful online content:
<https://reportharmfulcontent.com/>
- CEOP for advice on making a report about online abuse:
<https://www.ceop.police.uk/safety-centre/>

Additionally, pupils will be referred to the Acceptable Use of Computer Network by Pupils Policy

Staff Code of Conduct

Professional judgment coupled with the Staff Code of Conduct should prevail when staff consider how to conduct themselves: this approach also applies to online interaction.

The Director of Teaching and Learning leads on matters related to remote teaching and the School's Remote Learning Policy gives clear advice and guidance. The following expectations are to be observed when engaging in virtual lessons and especially where webcams are involved.

Appearance and presentation

- Staff and pupils must wear appropriate clothing, as should anyone else in the household who might be visible.
- Other than the staff and the pupil, no other member of the household should be in attendance during lessons or activities, except by prior arrangement and with the explicit permission of all parties.
- Any devices used should be in appropriate areas (for example, not in bathrooms).

- Any background on a video call should be blurred or a virtual background should be used, unless operating from a work room in School (such as a Housemaster's study).
- A formal and respectful register should be deployed at all times, including anyone else in the household who might be audible or visible.
- Always take time to listen to others, give others time to speak, and avoid talking at the same time.

Scheduling and different types of meeting

- Staff and pupils should adhere to the published timetable and Almanack for lessons and events.
- Small group meetings are to be preferred to one to one meetings.
- Where one to one meetings need to be scheduled, they should be pre-arranged as a calendared meeting, at a mutually convenient time during the conventional working day. For academic matters, a co-teacher / HoD must be cc-ed in and able to attend. For pastoral matters, another member of the house staff or pastoral staff must be cc-ed in and able to attend. The exception to this is in counselling or medical matters, where a higher degree of confidentiality is typical; there careful records of the date, time and content of the meeting need to be made.
- If either a pupil or a member of staff has a concern about the nature of any online interaction, the matter should be reported to the DSL.

Video calling and online platforms

- Live classes and images through the online platforms are not to be recorded, except with the explicit permission of all relevant parties and only for the purposes of examination assessment.
- All participants in any online video call should be visible except when specifically instructed that video should be disabled.
- Only platforms provided by the School should be used in order to communicate between members of staff and pupils.
- Any behaviour or comments that are inappropriate should be reported to the Housemaster, or, in the case of a safeguarding concern, to the Under Master.

Expectations of households where pupils are working

Pupils need to be able to work in a workspace that is quiet, safe and free from distractions. Pupils will need access to a computer that has wireless access and video-conferencing facilities.

It is not expected that other members of the household will be in attendance or take part in a scheduled session with a member of staff, unless a separate meeting has been specifically arranged.

It is not appropriate for parents to record, share or comment in any public or closed forum about individual pupils or members of staff.

Supporting children when they are not in School

Physical wellbeing

Protracted periods of time sat in front of a computer are not healthy. All members of the community should seek to break up their screen-time, taking breaks regularly away from the screen.

Pupils on the edge of social care support

The School is committed to ensuring the safety and wellbeing of all of its pupils.

Where the DSL has identified a pupil to be on the edge of social care support, or who would normally receive enhanced levels of pastoral-type support in School, Housemasters in discussion with the DSL will ensure that a robust communication plan is in place for that child. The communication plan could include: strategic remote contact, telephone contact and door-step visits.

Emotional welfare

The School recognises that it has a role to play in protecting the welfare of its pupils and that the current circumstances can affect the mental health of pupils, their parents / guardians and their families. Staff need to be aware of this in setting expectations of pupils' work and of the way in which they interact with pupils and their families.

Key workers' children

The School will ensure that where the children of critical workers and vulnerable children are on site, it will provide appropriate support, ensuring that appropriate staff are on site and that the staff to pupil ratio numbers are appropriate, to maximise safety.

Promoting HM Government advice

The School recognizes the important role that it has to play in helping the community to safeguard itself. As such, opportunities to promote social distancing and good hygiene will be taken regularly.

Peer on peer abuse

Where the School receives a report of peer on peer abuse, the principles as set out in KCSIE (2019) and those outlined within the School's Safeguarding Policy will be followed. The School will listen and work with the young person, parents and any multi-agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded, and appropriate referrals made.

APPENDIX G

COVID-19

In order to safeguard pupils during these unprecedented times the School is following the government guidance for school closures during COVID-19. This Appendix sits alongside the School's existing Safeguarding Policy.

Context

From Monday, 15 June 2020, pupils in Years 10 and 12 are allowed to return to School for some face-to-face engagement with members of staff.

Face-to-face engagement with pupils

Having been away from School for some time and with pupils and staff only engaging remotely, it is likely that staff will notice some change in the way that pupils present. Typically, colleagues will pick up on small changes in behaviour or outlook, but it is likely that subtle changes will not be as obvious. As such, the level of pastoral engagement with pupils will need to be more exploratory and potentially more searching than usual, with direct questions asked about health and wellbeing. For those who have a safeguarding profile, it is especially important that sensitive questions are raised.

Handling concerns

Staff (and, indeed, pupils) may identify new safeguarding concerns about individual children as they see one another in person following the School's closure. As usual, any concerns should be shared with a member of the Safeguarding team and advice sought, if necessary. It continues to be the case that staff must act immediately on any safeguarding concerns that might arise.

The process for sharing information about peer-on-peer abuse remains the same as in Appendix E.

If staff have concerns about a staff member or volunteer who may pose a safeguarding risk to children, staff should follow the same arrangements as outlined in main policy under the heading "Concerns about / allegations against a member of staff".

The DSL and Deputy DSLs continue to be available on-site and ready to provide any support that is required.

Sharing information

Housemasters will continue to engage with parents about the welfare of pupils, so as to inform any conversations that are taking place with pupils. Any lower level concerns will be picked up with the DSL in the weekly meeting between the DSL and the Housemaster.