



Hampden Gurney Church of England Primary School

Safeguarding Policy

"Ask and it will be given to you; seek and you will find; knock and the door will be opened to you." Matthew 7: 7

Hampden Gurney Church of England Primary School Safeguarding Policy

Version	One
Developed by	Eva Valverde
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Key Setting Information

Setting Main Phone Number	
Setting Main Email	office@hampdengurney.co.uk admin@hampdengurney.co.uk
Setting Address	Nutford Place W1H5HA
Designated Safeguarding Lead	Eva Valverde
Deputy Designated Safeguarding Lead	Evelyn Chua Hannah Shin
Named Person for Allegations against staff & volunteers (Headteacher)	Evelyn Chua
SENDCo / Special Needs Lead	Eva Valverde
LAC / PLAC Lead	Eva Valverde
Headteacher / Principal	Evelyn Chua
Chair of Governors / Trustees	Brian Hilton
Safeguarding Link Governor	Anne Larkey

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Introduction

The Department for Education (DfE) has published an updated version of the statutory guidance Keeping children safe in education (KCSIE) 2021 which revises the 2020 guidance. This policy has been updated in accordance with the changes.

Keeping Children Safe in Education 2021 is statutory guidance and applies to all schools and colleges. Schools are defined as “all schools whether maintained, non-maintained or independent schools (including academies, free schools and alternative provision academies), maintained nursery schools and pupil referral units”. Colleges means “further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector” (KCSIE 2021)

There is an expectation that staff have understood rather than just read updated KCSIE - condensed version of part one is now added. School governors and proprietors to decide if staff not working directly with children only need to be given condensed version.

The 2021 guidance includes changes in the following areas:

- **Changes to the role of DSL** outlining there is now an expectation for the DSL to liaise with mental health professionals where safeguarding concerns are linked to mental health. In addition, it outlines the importance in ensuring that children are heard and understood. Requesting that DSL's are given the opportunity to enhance the skills required to perform this element of their role.
- **Peer on Peer abuse**, with particular emphasis on sexual abuse and harassment that students experience in school or colleges. The new guidance highlights the importance of responding to concerns like this seriously and appropriately. It also highlights the impact that technology has on sexual abuse and harassment which should be considered by all school and colleges.
- **Managing allegations against staff.** School and colleges have been asked to take particular note of low-level concerns that are evident in staff. There is a requirement for low-level concerns to be highlighted and recorded and trends of behaviour explored, within the code of conduct policy. Schools/colleges should take account of local safeguarding arrangements and WFSP in terms of making referrals about low level concerns
- **Information sharing** which highlights the importance of staff sharing all relevant information in order to prevent harm to a child. This is acknowledging that there may be concerns about a child or family that could be considered low-level, however, should still be shared in order to protect.

- **Mental Health;** outlining that if staff have concerns about the mental health of a child who already has a safeguarding concern that this should be highlighted to the DSL or DDSL as soon as possible.
- There is an update to **online safety;** KCSIE has outlined a need for school and colleges to review their online safety policy making it clear about the expectations around use on site. It also states that school and colleges should review their online safety policy at least annually.
- There has been explicit guidance given about **non- school activities** outlining the need for safeguarding policies and procedures to be maintained even when being used out of school time if it is being provided by the school or proprietor. Where services or activities are provided by an external body, it is the expectation of the school or proprietor to ensure that appropriate safeguarding policies and procedures are in place.
- Guidance has been provided on ensuring that the LA, school and parents engage in a meeting prior to **elective home education** taking place.
- Ensuring that safeguarding policies highlight and reflect the additional barriers for students with **special educational needs and disabilities, physical or mental health difficulties.**
- **External visitors; contractors.** When school and colleges use contractors, they should set out the safeguarding policy and procedures prior to work commencing. **Visiting professionals;** ensuring that there is a professional capacity check and ensuring that arrangements for external professionals are set out in the safeguarding policy.

Purpose and Scope

Our commitment to Safeguarding

We believe that all children have a right to be safe and should be protected from all forms of abuse and neglect.

Although reporting concerns can be uncomfortable for staff, and be unpleasant for families, as a school, we recognise that it is better to help children, young people and their families early, before issues escalate and become more damaging.

Because safeguarding is everyone's responsibility, all staff are committed to recognising and reporting all concerns relating to child safety, wellbeing and are vigilant to spot signs of abuse and maltreatment.

As such, we promise to:

- Be observant and alert to signs of abuse
- Be curious and question explanations given by parents / children / staff
- Be compassionate, honest and clear
- Ask for support when we feel at the limit of our experience / patience / skills
- Understand and follow school policies and procedures
- Work together with other agencies when appropriate to make sure that support for children, young people and families is effective and helps improve outcomes.

Children and young people learn and thrive best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them.

Hampden Gurney aims to offer an environment where children feel welcome, safe, stimulated and where children are free to enjoy learning and developing in confidence.

The purpose of this policy is to safeguard and promote the welfare of children at Hampden Gurney.

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

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Taking action to enable all children to have the best outcomes.

In order to take all necessary steps to keep children safe and well, Hampden Gurney will:

- Ensure our approach is child-centred, considering always what is in the best interest of the child
- Safeguard children both preventatively and responsively
- Ensure the suitability of adults who have contact with children
- Promote good health, effective management of medical conditions, and the development of self-care in children & young people
- Have clear standards of behaviour for staff / volunteers and children / young people
- Manage behaviour by anticipating possible concerns, prevention strategies, and clear, fair responses to challenging behaviour
- Maintain records that document safeguarding concerns over time, including low-level worries about a child or young people that together may paint a picture of concern
- Ensure that all policies and procedures relating to safeguarding and wellbeing are updated annually in collaboration with the board of governors (or similar).

Who is responsible for Safeguarding?

No single professional can have a full picture of a child's needs and circumstances.

This policy applies to **all staff**, including paid staff, volunteers and sessional workers, agency staff, organisations contracted to deliver services within Hampden Gurney, one-off visitors, students or anyone working on behalf of Hampden Gurney. This policy relates to all children (anyone up to their 18th birthday) with whom Hampden Gurney works.

This policy is readily available via our website <https://www.hampdengurneyschool.co.uk/> for practitioners, parents and partners and is given to parents prior to children commencing and following each update. Support and consideration will be given to those parents for whom English is not a first language.

The voice of the child

All staff will endeavour to ensure that their approach is child and family-centred. This means that they will consider what is in the best interests of the child, and how to approach families with compassion and respect.

Staff will always seek to understand and give voice to the lived experience of a given child and young person within Hampden Gurney, at home and within their wider community, even if children and young people are unable / unwilling to express their experience themselves.

Safeguarding legislation and guidance

Maintained schools Section 175 of the [Education Act](#) 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

The [Teachers' Standards](#) state that teachers, including headteachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.

The statutory guidance [Working Together to Safeguard Children](#) 2018 covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools.

The statutory guidance [Keeping Children Safe in Education](#) 2021 is issued under Section 175 of the [Education Act](#) 2002, the [Education \(Independent School Standards\) Regulations](#) 2014 and the [Non-Maintained Special Schools \(England\) Regulations](#) 2015.

[What to do if you're worried a child is being abused](#) 2015 - Advice for practitioners is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action. This is in the shared drive.

All staff must read Part One of [Keeping Children Safe in Education](#) 2021. Staff can find a copy on https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014058/KCSIE_2021_Part_One_September.pdf In addition, **all staff who work directly with children** must read **Part Five** and **Annex A and C** . All staff are required to provide signed confirmation that they have read Part One of [Keeping Children Safe in Education](#) 2021 and Part Five and Annex A and C (where appropriate), which will be kept in staff files. A template document can be found in Appendix 7.

Key Safeguarding Roles & Responsibilities

Designated Safeguarding Lead (DSL)			
Name:	Eva Valverde	Email:	senco@hampdengurney.co.uk
Job Title:	SENCo/DSL/Assistant Headteacher	Phone:	02077237482
Deputy Designated Safeguarding Lead(s) (DDSLs)			
Name:	Evelyn Chua	Email:	head@hampdengurney.co.uk
Job Title:	Head Teacher	Phone:	02077237482
Name:	Hannah Shin	Email:	hshin@hampdengurney.co.uk
Job Title:	Assistant Headteacher	Phone:	02077237482
Headteacher – managing allegations			
Name:	Evelyn Chua	Email:	head@hampdengurney.co.uk
Job Title:	Headteacher	Phone:	02077237482
Chair of Governors – managing allegations against Headteacher			
Name:	Brian Hilton	Email:	chair@hampdengurney.co.uk
Job Title:	Chair of Governors	Phone:	02077237482
Link Governor for Safeguarding			
Name:	Anne Larkey	Email:	alarkey@hampdengurney.co.uk
Job Title:	Foundation Governor	Phone:	02077237482
Designated Teacher for looked after children			
Name:	Eva Valverde	Email:	senco@hampdengurney.co.uk
Job Title:	SENCo	Phone:	02077237482
SENDCo			
Name:	Eva Valverde	Email:	senco@hampdengurney.co.uk
Job Title:	SENCo	Phone:	02077237482

Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff, from the Hampden Gurney leadership team. During term time the DSL and/or a Deputy Designated Safeguarding Lead (DDSL) will always be available (during Hampden Gurney hours) for staff in the school to discuss any safeguarding concerns.

The broad areas of responsibility for the DSL are:

- Management of referrals
- Provides advice, support and expertise
- Maintains and manages records
- Champions children’s wellbeing

- Primary point of contact for safeguarding
- Supports and liaises with parents, carers and families
- Sets communication policy
- Coordinates training and induction
- Ensures Safer Recruitment / Management of Allegations against Staff & Volunteers

It is important that DSLs obtain a full and rich picture of children's experience. As soon as staff identify indicators of concern, they should record all concerns (including lower-level/pastoral, concerns about a child's wellbeing – be it expressed in behaviour, presentation, relationships) on **CPoms**, and if the concerns are serious, they should speak to the DSL without delay.

The Headteacher

Although DSLs take responsibility for Safeguarding in Hampden Gurney, the Headteacher, Mrs Chua is ultimately responsible for all the children / young people in Hampden Gurney. Mrs Chua should be contacted immediately in the event that possible harm (emotional, physical, sexual, neglect) to a child or young person has been caused by a member of staff or volunteer.

Leads by Setting Safeguarding Ethos

- Ensures that the child protection policy and procedures are understood and implemented by all staff.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Ensures that the culture of the Hampden Gurney supports the provision of effective pastoral care and early help, and that staff do everything they can to support social workers when children's social care become involved.
- Ensures that pupils are always provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

Prioritises Safeguarding

- Allocates enough time, training, support and resources, including cover arrangements when necessary, to enable the DSL and DDSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Supports the designated teacher for looked after children to promote the educational achievement of any pupils who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Ensures Safer Recruitment and Allegations against Staff & Volunteers (ASV)

- Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff (including agency staff and supply teacher) or volunteer to the Designated Officer for the Local Authority (LADO) within one working day prior to any internal investigation.
- Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO.
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.

The Governing Body

Ensures that Hampden Gurney:

- Appoints a DSL who is a member of the senior leadership team and who has undertaken training in multi-agency working, in addition to child protection training
- Ensures that the DSL role is explicit in the role holder's job description (and the job description of any DDSL) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- Ensures that the DSL or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. The DSL or a DDSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Skype or other such media.
- Ensures that the DSL or a DDSL is always available at least via telephone or other media as above during any out of hours/out of term school activities.
- Has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- Has procedures for dealing with allegations of abuse made against members of staff (including supply staff) and volunteers including allegations made against the headteacher and allegations against other children.
- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification from providing childcare regulations.
- Develops an induction strategy that ensures all staff, including the headteacher, and volunteers receive information about the school's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction.
- Develops a training strategy that ensures all staff, including the headteacher, and volunteers receive appropriate and regularly updated safeguarding and child

protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.

- Ensures that all staff, including temporary staff and volunteers, have read and understood the school's child protection and safeguarding policy and Staff Behaviour Policy (code of conduct) before they start work at the school.
- Appoints a designated teacher to promote the educational achievement of children who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training.
- Contributes to multi-agency working and plans.
- Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensures an effective pastoral care offer and Early Help offer.
- Ensures that children are taught about how to identify risks, including online, and how to access support and help.
- Ensures that the voice and lived experiences of children are heard and reflected in the life of Hampden Gurney.
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the [Data Protection Act 2018](#) and [General Data Protection Regulations \(GDPR\)](#). This includes:
 - Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'
 - Understanding that safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, if cannot be reasonably expected that against consent or if to gain consent would place a child at risk
 - For schools, not providing personal data where the serious harm test under the legislation is met. An explanation of the harm test can be found on the [Disclosure and Barring](#) service website. Where in doubt independent legal advice should be sought.

Chair of Governors

The governing body nominates a member (normally the chair- Brian Hilton) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the headteacher.

Link Governor for Safeguarding

The governing body also identifies a named governor to take leadership responsibility for Hampden Gurney's safeguarding arrangements (Anne Larkey). That governor will maintain regular contact with the DSL, meeting each half term, and will ensure that the governing body receives regular reports about safeguarding activity at Hampden Gurney.

It is the responsibility of the governing body to ensure that the school's safeguarding, recruitment and managing allegations procedures consider the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.

All school staff

All Hampden Gurney staff have a responsibility to provide a safe learning environment in which our children can learn. Any child may benefit from early help and all staff members are aware of the local early help process and our role in it. They are aware of signs of abuse and neglect so they are able to identify children who may be in need of help or protection. All staff are aware of and follow school processes (as set out in this policy) and are aware of how to make a referral to Social Care if there is a need to do so. If staff have any concerns about a child's welfare, they must act on them immediately and speak with the DSL or DDSL – they do not assume that others have taken action.

Identifying Abuse

Being alert to abuse and to the fact that 'it could happen here' is crucial to safeguarding. Knowing what to look for is vital for the early identification of abuse and neglect. All staff are aware of the Indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

An abused child will often experience more than one type of abuse, as well as other difficulties. Children can be at risk of abuse or exploitation in situations outside their families. Abuse reduces resilience in children and puts them at further risk of abuse throughout their lives. Abuse and neglect can happen over a period but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

Our school is aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection. All staff are aware of environmental factors which may

impact on a child's welfare and safety and understand safeguarding in the wider context (contextual safeguarding). Staff are aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

Staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the DSL.

Growing up with adverse childhood experiences (ACEs) such as abuse, neglect, community violence, homelessness, parental separation, bereavement or growing up in a household where adults are experiencing mental health issues or harmful alcohol or drug use, can lead to negative, lifelong emotional and physical outcomes. There is potential for (ACEs) to have a significantly harmful effect on the trajectory of a young person's life. The impact can affect their physical and mental health, self-worth and ability to develop healthy relationships.

When the stress of these adverse experiences is so severe or prolonged that a child is unable to process it, what should be a normal survival response becomes "toxic stress". This type of stress alters the functioning of the brain and has a long-lasting and injurious impact on the developing mind, which we call "trauma". This trauma affects the way those suffering it think and act throughout their lives. Understanding such mental and emotional trauma is key to understanding the behaviour of millions of people.

Types of Abuse

There are four main categories of abuse and neglect:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Peer on Peer Abuse

Our school may be the only stable, secure and safe element in the lives of children at risk of, or who have suffered harm. Nevertheless, whilst at school, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children. Our school recognises that some children may abuse their peers and any incidents of peer on peer abuse will be managed in the same way as any other child

protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.

Peer on peer abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with peer on peer abuse.

We take particular note of sexual violence/harm or harassment that takes place in Hampden Gurney ensuring that all disclosures are taken seriously. Making sure that all disclosures are supported and considered when making plans for next steps. This is to maintain that support for the victim is executed whilst acknowledging the disciplinary action that may be required. Where possible, support to the victim and disciplinary action will be maintained at the same time as appropriate and on a case by case basis. This will be determined by risk assessment, liaison with LA, family and with consideration of the victim's needs.

Serious Violence

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

Children with Special Educational Needs and Disabilities, physical or mental health difficulties

Our school understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration
- That they may be more prone to peer group isolation than others
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs
- Communication difficulties in overcoming these barriers

Children Missing from Education

All children, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our school recognises that a child missing

education is a potential indicator of abuse or neglect and will follow the school procedures for unauthorised absence and for children missing education. It is also recognised that, when not in school, children may be vulnerable to or exposed to other risks, so we work with parents and other partners to keep children in school whenever possible. Parents should always inform us of the reason for any absence. Where contact is not made, a referral may be made to another appropriate agency (Social Care or Police). Parents are required to provide at least two emergency contact numbers to the school, to enable us to communicate with someone if we need to.

Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys and girls from any background or community. The definition of Child Sexual Exploitation (CSE) from the Department of Education (DfE, 2017) :

"Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".

It is understood that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns. The DSL will lead on these issues and work with other agencies as appropriate.

Child Criminal Exploitation is a geographically widespread form of harm which is a typical feature of county lines criminal activity (county lines is when drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban areas and seaside towns).

Contextual Safeguarding- Extra-familial harm.

Safeguarding incidents and behaviours can be associated with factors outside our school. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a child's life are a threat to their safety and/or welfare. To this end, we will consider relevant information when assessing any risk to a child and share it with other agencies to support better understanding of a child and their family.

Domestic Abuse can take many forms, including psychological, physical, sexual, financial and emotional. Hampden Gurney recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on children. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm. Hampden Gurney has joined Operation Encompass. Operation Encompass directly connects the police with schools to ensure better outcomes for children who are subject or witness to police-attended incidents of domestic abuse. Rapid provision of support within the school environment means children are better safeguarded against the short-, medium- and long-term effects of domestic abuse.

Allegations of domestic abuse or the risk of or witnessing of such incidents will be referred to the Duty and Assessment Team under our Child Protection Procedures.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse. As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our school will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

Forced Marriage is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

Prevention of Radicalisation

As of July 2015, the [Counter-Terrorism and Security Act \(HMG, 2015\)](#) placed a new duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It requires schools to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion
- be safe spaces in which children / young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Our school works in

accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate.

Helping children to recognise risk and access support

A key mechanism for keeping children safe in education is ensuring that they are given an understanding of how to recognise risk and where to go for help when they need it. Giving children and young people an understanding of what is and is not appropriate in professional conduct and in their home care, can improve identification of concerns and reporting about themselves and their peers.

Hampden Gurney encourages children to report concerns. Children are taught that the school will help them and that they should feel safe talking to any members of staff.

[Keeping Children Safe in Education](#) 2021 requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online safety, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have. Hampden Gurney follows the JIGSAW scheme of work for PSHE.

Relationships Education is compulsory for all pupils receiving primary education and Relationships and Sex Education (RSE) compulsory for all pupils receiving secondary education. [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#) has been produced and contains information on what schools should do and sets out the legal duties with which schools must comply when teaching Relationships Education, Relationships and Sex Education (RSE) and Health Education.

[Making sense of relationships](#) is an NSPCC resource to support children and young people's development of healthy relationships through comprehensive PSHE lesson plans for KS2-KS4.

Child & Young People's Disclosures to Staff

Children and young people may disclose concerns to staff and may do so knowing that what they are disclosing is a concern, and sometimes they will be unaware that their disclosure will signal concerns. Wherever possible, staff should make the time and space to listen and understand what the child / young person is disclosing. Staff should not be afraid to respond to children naturally, as they would for any other disclosure, and should respond with compassion and empathy.

If disclosures are concerning but vague, the DSL or other staff may need to speak to the child further in order to obtain enough information to meet threshold. In these circumstances, DSL and staff should agree how this will take place and the practitioner should use open questions (including, questions starting with 'when', 'where', 'why', 'how', etc).

Especially vulnerable pupils

To ensure that all our pupils receive equal protection we will give special consideration to children who are particularly vulnerable.

Children & Young People Especially Vulnerable:

- Mental health concerns
- Young carers
- Transgender children / young people
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism.

This list provides examples of additional vulnerable groups and is not exhaustive.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes, which should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions in relation to safeguarding and promoting welfare (i.e. responding to unauthorised absences or missing education episodes and the provision for pastoral and/or academic support).

Children requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

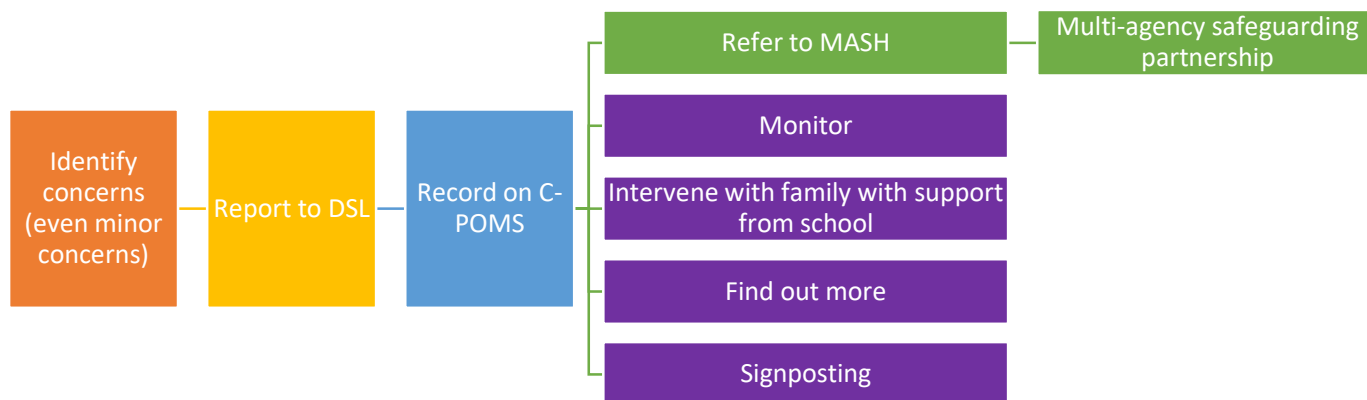
All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Immediate action should be taken in response to any mental health concerns about a child. Action will also be taken where there is a safeguarding concern already present, through reporting the concern to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Advice to help identify children in need of extra mental health support, this includes working with external agencies can be found in the [mental health and behaviour in schools guidance](#). Hampden Gurney works closely with Anna Freud and Mind.

Safeguarding Procedure in [School / College]



Information sharing

The [Data Protection Act](#) 2018 and [General Data Protection Regulations \(GDPR\)](#) 2016 **do not prevent the sharing of information for the purposes of keeping children safe**. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. See [Data protection: a toolkit for schools](#) 2018, guidance developed to support schools with data protection activity, including compliance with GDPR.

When deciding whether information needs to be shared with practitioners within the setting or with other agencies, practitioners should take account of the following principles, bearing in mind that the most important consideration is whether sharing information is likely to support the safeguarding and protection of a child:

- Necessary & Proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure
- Recorded

Practitioners should consider when they share information, how and how much they share, and where possible they should be transparent about the fact that they're sharing. It is

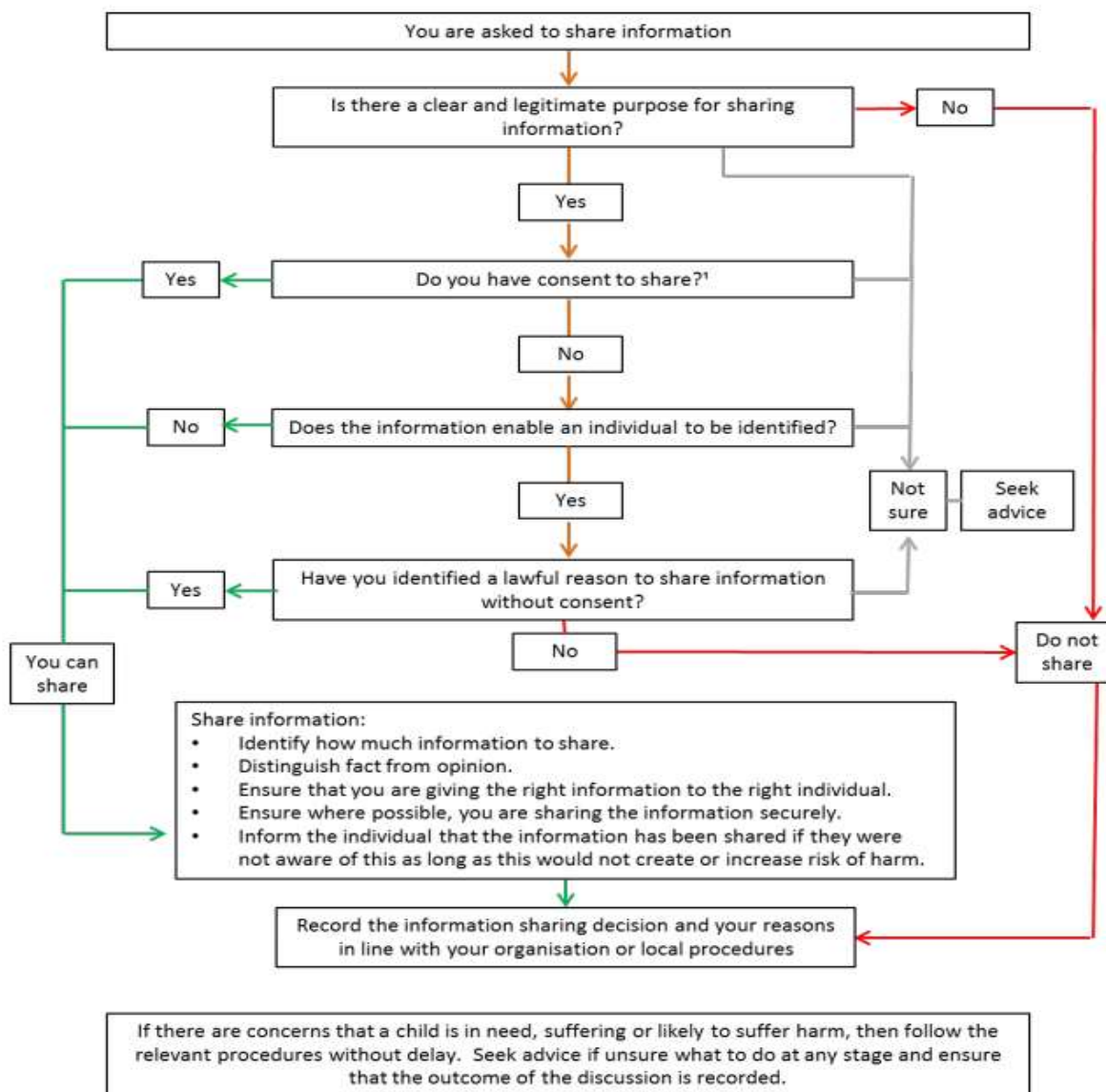
important to acknowledge that sharing of all information that could be regarded big or small is essential for the protection of the child.

Although the process for deciding whether to share information is the same within and outside the setting, in terms of proportionality and the need to know, sharing information with practitioners from other agencies (even if based in school / college) needs to be documented. It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school. However, staff should report all child protection and safeguarding concerns to the DSL or headteacher or – in the case of concerns about the headteacher – to the chair of governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

Every effort will be made to prevent unauthorised access to sensitive information. Portable devices such as mobile phones, laptop computers, tablets or on portable media will be kept in locked storage when not in use.

Flowchart of when and how to share information



If in doubt about sharing, see: [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) 2018.

Transitions

All schools are responsible for ensuring appropriate transitions from one setting to another. This includes preparing children and welcoming them appropriately and sharing the full pastoral and safeguarding context of a child, required for the new setting to understand behaviours within a full context of experiences by the child.

Where possible, school transitions teams must endeavour to meet every new child within their primary setting, prior to secondary transfer. The child's safeguarding file should be

transmitted electronically via the online safeguarding system. Otherwise, PDF versions can be sent by secure email or by recorded delivery to the named DSL in the new setting.

Recording

Recording of concerns should take place as close in time to the incident as reasonably possible, by using **C-POMS** via unique log-ons. Where concerns are serious, in addition to logging concerns, staff should seek to speak to a DSL immediately either in person or by phone.

DSL Decision-Making

Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point.

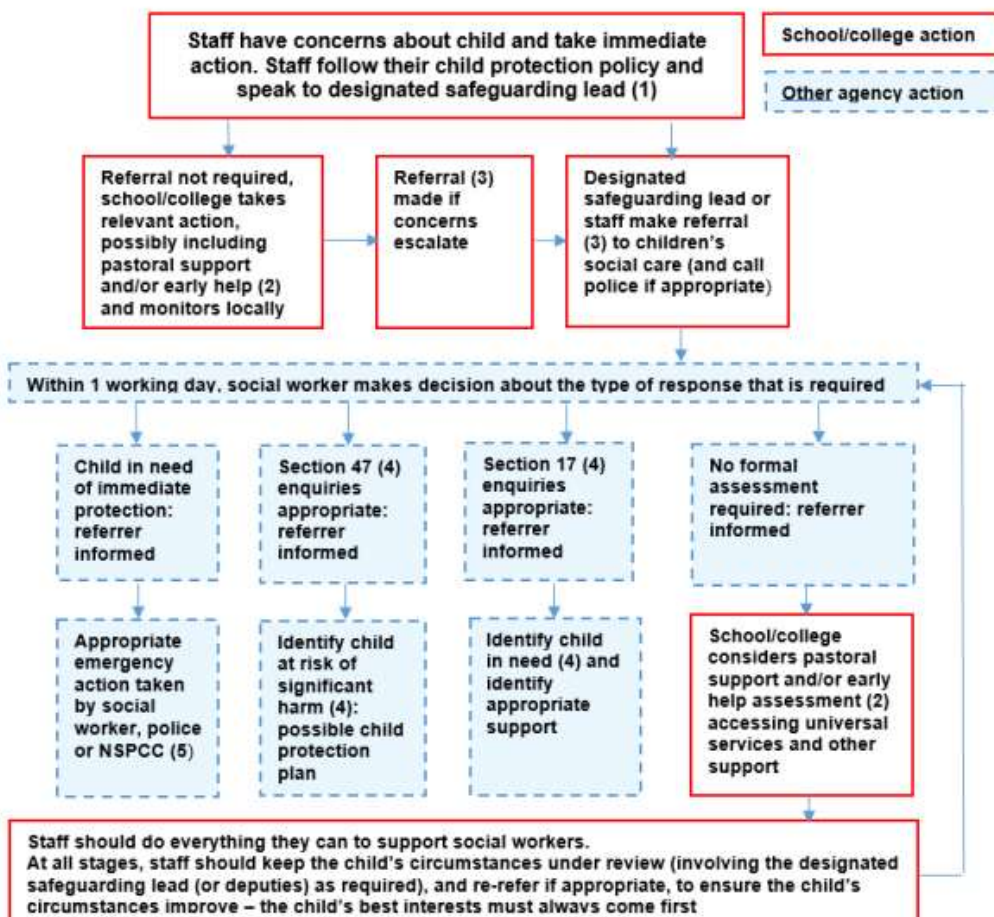
Options for action are:

Pastoral Care	Keeping Children Safe in Education 2021 acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school's own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.
Early Help (MASH)	Schools can refer children and families for early help assessment and support, with the informed consent of parents.
Referral to statutory services (MASH)	A referral must be made to MASH/children's social care (and if appropriate the police) immediately if the child is: <ul style="list-style-type: none">• A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled• Suffering, or likely suffering, harm.
Allegation of harm to a child by a practitioner	If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

Following a number of cases nationally where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education](#) 2021 emphasises that any

member of staff must contact and/or make a referral to Children’s Social Care if they are concerned about a child, if their DSL does not share their views.

Actions where there are concerns about a child



- (1) In cases which also involve a concern or an allegation of abuse against a staff member.
- (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 process set out in the local threshold document and local protocol for assessment. 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. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child’s welfare. Full details are in Chapter one of Working Together to Safeguard Children.
- (5) This could include applying for an Emergency Protection Order (EPO).

Referrals

Multi-agency Safeguarding Hub (MASH) is Westminster’s single point of referral to social care for concerns regarding children, young people and vulnerable adults:

- Early Help (parental consent needed)
- Child in Need
- Child Protection

- Adult Safeguarding

Referrals to the MASH should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the case prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to decide to come and see the child that same day in school, if deemed necessary.

At Hampden Gurney the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of school staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will make usually contact with the parent in the event of a concern, suspicion or disclosure. Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

Holding children in school after a referral to MASH

Sometimes MASH social workers and police will want to see a child on the day of referral to ensure that they are safe to go home. In such cases, they will ask you to keep the child in school until the visit has taken place. This is because it can take time to organize the visit with an available social worker and police officer, sometimes families will be asked to wait at school before a child is released to them, and they may be asked not to see their child during this time. This can be stressful and uncomfortable for both schools and families and sometimes all are kept at school until late in the evening. School should prepare families for the length of time this process can take and treat them with compassion and understanding and make every attempt to facilitate this difficult process.

Schools do not have powers to prevent a child from leaving their school when a parent arrives. As such, if a parent refuses to comply with the request for their child to remain in

school until a professional is able to speak to them, the school should inform the parent that they will be alerting emergency services. The school should then inform the social worker and police immediately.

Support for pupils, families and staff

Child abuse is devastating and traumatic for children. Even those parents who hurt their children will be distressed. It can also result in secondary trauma in those staff who are involved in these cases.

We will support pupils, their families, and staff by:

- Taking all concerns and disclosures seriously
- Nominating a link person (*usually the DSL*) who will keep all parties informed
- Appointing a separate link person where the DSL is the subject of an allegation
- Prioritising mental health and resilience, and accepting that everyone can have a bad day
- Responding sympathetically to any request from pupils or staff for time out to deal with distress
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Signposting to helplines, counselling or other avenues of external support
- Following procedures in safeguarding, whistleblowing, complaints and disciplinary procedures
- Co-operating fully with relevant statutory agencies.

Practitioners' Code of Conduct

This policy should be read alongside Hampden Gurney's Code of Conduct. Practitioners are in a position of trust and authority and have a duty of care towards the children and young people we work with.

All practitioners are likely to be a **role model** and are expected to act appropriately; this includes:

- Prioritising the welfare of children and young people
- Providing a safe environment for children and young people
- Following principles, policies and procedures and staying within the law
- Challenging all unacceptable behaviour & reporting any breaches of the Code of Conduct immediately

All practitioners must ensure that the **rights of the child** are upheld throughout their practice, including:

- Treating children and young people fairly and without prejudice or discrimination
- Understanding that children and young people are individuals with individual needs
- Respecting differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different
- Challenging discrimination and prejudice
- Encouraging young people & adults to speak out about attitudes / behaviour that makes them uncomfortable.
-

In forming **appropriate relationships** with children, all practitioners should endeavour to:

- Promote relationships that are based on openness, honesty, trust and respect
- Avoid favouritism or forming exclusive relationships with children
- Be patient and considerate of any individual child's developmental capacity
- Exercise caution when you are discussing sensitive issues with children or young people
- Ensure all contact with children and young people is appropriate and relevant to the work
- Ensure that whenever possible, there is more than one adult present during activities with children and young people, or that the practitioner is in sight of others (e.g., classroom doors open, glass walls, etc)
- Only provide personal care in an emergency and make sure there is more than one adult present if possible, unless personal care is explicitly part of your role and you have been trained to do this safely.

Practitioners should always demonstrate respect towards children, including:

- Listening to and respecting children
- Valuing and taking children's contributions seriously, actively involving them in planning activities
- Respecting a young person's right to personal privacy as far as possible
- If breaking confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity, and to keep them updated as to what is happening.

Inappropriate / unacceptable behaviour in practitioners, that must always be reported, includes:

- Allowing concerns or allegations to go unreported
- Taking unnecessary risks
- Developing inappropriate relationships with children and young people, including any private communications
- Making inappropriate promises to children and young people
- Engaging in behaviour that is in any way abusive, including having any form of sexual contact with a child or young person.
- Letting children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- Acting in a way that can be perceived as threatening or intrusive
- Patronising, belittling children and young people or making sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to, or in front of, children and young people, including sexual staring.

If practitioners fail to act within the above guidelines, or fail to report breaches, they will be subject to disciplinary procedures. Depending on the seriousness of the situation:

- Practitioners may be asked to leave the school, temporarily or permanently
- School may make a report to statutory agencies such as the police and/or the local authority child protection services or LADO.

All reports should be made in confidentiality to the Headteacher.

Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern. New staff, volunteers and governors, including supply staff, will receive a safeguarding induction:

- the school's child protection and safeguarding policy
- the staff behaviour policy (code of conduct)
- the identity and role of the DSL and all Deputy DSLs
- the school's behaviour policy
- the school's safeguarding response to children who go missing from education.

All staff, including the headteacher (unless the headteacher is the DSL), volunteers and governors will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the local safeguarding partnership.

The DSL will attend training for newly appointed DSLs and refresher training within a two-year period. In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development. This includes attendance at the DSL Forums.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap one another. All staff should also be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff but especially the DSL and DDSL should consider whether children are at risk of abuse or exploitation in situations outside their families. All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, peer on peer abuse, sexual harassment and sexual violence/harm in school, extremism, female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

In addition, the headteacher (and/or other school leaders as appropriate) and at least one governor will attend safer recruitment training and the school will ensure that there are at

least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Allegations against staff and volunteers (ASV)

To manage allegations against professionals, every Local Authority appoints a Designated Officer (LADO). The LADO should be alerted to all cases in which it is alleged that a person who works with children has:

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

The term “professional” in this context includes paid employees, volunteers, casual/agency staff and self-employed workers who will have contact with children as a part of their role. The LADO ensures that all allegations or concerns about professionals or adults working or volunteering with children are recorded appropriately, monitored and progressed in a timely and confidential way. The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO provides advice and guidance to employers and voluntary organisations, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

The LADO is available for consultation via email lado@westminster.gov.uk or by telephone discussion 02076417668 for anyone who has a concern that a person who works or volunteers in a capacity that brings them into contact with children in Westminster, may pose a safeguarding risk.

Any allegations or concerns MUST be reported to the LADO within 24 hours (or one working day) of it coming to notice.

Low level concerns should always be undertaken in consultation with the LADO in congruence with local procedures and guidance. The consultation process allows for concerns to be evaluated objectively and to ascertain whether or not similar concerns may have been raised by a previous employer but not met the threshold for investigation. Whilst the LADO will only record those allegations which appear to meet the threshold for consideration within these procedures, the employer should record any concern that arises in respect of a member of their staff.

In normal circumstances the LADO will be contacted by the headteacher. It is important to note that anyone can contact the LADO if they are concerned about a person’s conduct with

children. In Westminster, the LADO will accept a referral from any person who wishes to report a concern that meets the criteria above.

If there are any concerns that a member of staff (including supply teachers) or a volunteer has caused harm (emotional, physical, sexual, neglect) to a child, this represents an allegation against staff and volunteers. All allegations against staff (including supply teachers) and volunteers must be reported to the Headteacher in the first instance. The person against whom the allegation is made should not be notified at this point. If the allegation is against the head teacher, the concerns must be reported to the chair of governors and the LADO.

You should:

- report it to the **head teacher** within your organisation as soon as possible, however trivial it may seem;
- maintain confidentiality and guard against publicity while an allegation is being considered or investigated and follow local information sharing protocols

You should not:

- attempt to deal with the situation yourself;
- make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or alleged incidents;
- keep the information to yourself or promise confidentiality;
- take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing the alleged perpetrator or parents or carers.

The full procedures for dealing with allegations against staff can be found in Part 4 of [Keeping Children Safe in Education](#) 2020, and Part 7 of the [London Child Protection Procedures](#) 2017.

Whistleblowing

The school's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place. Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others.

All staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with the school's Code of Conduct / Whistleblowing policy. Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may

seem minor contraventions of the school's staff behaviour policy (code of conduct) – to the headteacher / principal; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in school.

Concerns or complaints about the headteacher should be reported to the chair of governors / trustees. For those who feel unable to raise these concerns internally, for whatever reason, they can contact the local authority designated officers (LADOs) who have oversight of allegations against practitioners and volunteers in the borough: lado@westminster.gov.uk or 02076417668.

Alternatively, staff can call the NSPCC whistleblowing helpline on: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or email: help@nspcc.org.uk.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or email help@nspcc.org.uk.

Complaints procedure

Hampden Gurney complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection / LADO action.

Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the Headteacher or an allocated member of the senior leadership team and governors.

An explanation of the complaint's procedure is included in the safeguarding information for parents and pupils. Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures. Complaints which escalate into a child protection concern / LADO referral will automatically be managed under these procedures in school.

Maintaining a Safe Site

Visitors & Site security

Visitors to the Hampden Gurney, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe Hampden Gurney's safeguarding and health and safety regulations to ensure children in school are kept safe.

The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. Social workers attending school to carry out statutory work with children must be allowed to do so, if they supply appropriate identification. Should the school have concerns about their identity, they should speak to the social worker's manager and request an email confirmation.

If schools require other visitors to show DBS certificates as a condition to entry, they must give visitors adequate notice of this requirement. Having sight of DBS certificate is not enough reason for allowing a visitor full, unsupervised access to Hampden Gurney and pupils – this must be done in conjunction with other reasonable checks and vetting.

Behaviour Management

Our behaviour policy is set out in a separate document and is reviewed regularly by the governing body. It is shared with all staff before they start working with children as part of their induction. The policy is transparent to staff, parents and pupils.

Use of reasonable force

All staff should be familiar with the statutory guidance for schools on [The Use of Force in Schools](#) 2015. When working with children with SEND, staff should have a full working knowledge of [Reducing the Need for Restraint and Physical Intervention with Children with SEND](#) 2019. [Keeping Children Safe in Education](#) 2019 highlights that there are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Staff should deploy every possible strategy to prevent the need for physical intervention. Those strategies would include de-escalation whenever there is a threat of violence or aggression towards an individual or property; communicating calmly with children; using non-threatening verbal and body language; helping children to recognise their own 'triggers' and 'early warning signs', and distracting or helping children to see a positive way out of a difficult situation. However, the school supports staff to intervene physically and to use reasonable force when all those strategies are unsuccessful in calming a situation and a risk of violence, serious damage to property or disruption to the school remains. Staff should always be able to demonstrate that any such intervention is reasonable, proportionate and necessary in the circumstances, is used for the shortest possible period, deploys the minimum force that is necessary and is never used as a sanction.

Searching Children

In accordance with DfE guidance [Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies](#), school staff can search a pupil for any item if the pupil agrees.

The headteacher and any member of staff authorised by the headteacher also has a statutory power to search pupils or their possessions, where they have reasonable grounds for suspecting that the pupil may have one or more of the following prohibited items in their possession:

- knives or weapons;
- alcohol;
- illegal drugs;
- stolen items;
- tobacco and cigarette papers;
- fireworks;
- pornographic images;
- indecent images of children;
- any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the pupil).

The headteacher and authorised staff can also search for any item banned by the school rules which has been identified in the rules as an item which may be searched for. When designating a member of staff to undertake searches under these powers, the headteacher should consider whether the member of staff requires any additional training to enable them to carry out their responsibilities.

School staff can confiscate any prohibited item found as a result of a search. They can also confiscate any item they consider harmful or detrimental to school discipline.

Searching staff must be the same gender as the pupil being searched; and there must be a witness (also a staff member) and, if possible, they should be the same sex as the pupil being searched. There is a limited exception to this rule. You can carry out a search of a pupil of the opposite sex to you and / or without a witness present, but only where you reasonably believe that there is a risk that serious harm will be caused to a person if you do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.

What the law says:

- The person conducting the search may not require the pupil to remove any clothing other than outer clothing.
- 'Outer clothing' means clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear but 'outer clothing' includes hats; shoes; boots; gloves and scarves.
- 'Possessions' means any goods over which the pupil has or appears to have control – this includes desks, lockers and bags.
- A pupil's possessions can only be searched in the presence of the pupil and another member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff.
- The power to search without consent enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

Extended school and off-site arrangements

All extended and of- site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection, Health & safety, and whistleblowing arrangements are in place.

Where extended school activities are provided by and managed by the school, our child protection policy and procedures apply. If another body provide services or activities on the school site, school should seek assurance that the provider's child protection policy and procedures are robust and sufficient. Good practice indicates schools should seek written copies of external providers child protection policies and procedures. In addition, ensuring there are appropriate arrangements in place to liaise should there be any child protection concerns raised.

Photography and images

To protect pupils, we will:

- Seek their consent for photographs or video images to be taken, including consent for the reasons for which photos will be used and how long they will be kept as per Data Protection legislation.
- Seek parental consent for the same.
- Ensure pupils are appropriately dressed
- Encourage pupils to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- Avoid naming children when possible
- If it is necessary to name children, use first names rather than surnames
- If children are named, avoid using their image
- Establish whether the image will be retained for further use, where and for how long
- Ensure that images are stored securely and used only by those authorised to do so.

For the protection of pupils and staff, only school owned equipment will be used to record, and store images taken by staff or volunteers on the school site or during offsite school activities including residential visits.

Parents are not welcome to take photographs of their own children only during school activities, subject to other restrictions notified to parents in advance in writing or verbally (e.g. parents will be asked not to take photographs during concerts/performances in order not to distract children who are performing or other audience members). Parents must not publish (including on social media) photographs of other children inadvertently captured during school events without the express permission of the parents of those children. Parents are not welcome to video record their own children only during school activities, subject to the same terms and conditions as for photographs above.

There may be occasions when parents are requested not to take photographs where a child is subject to social care procedures or who requires protection of their identity and whereabouts. They will not be singled out; in this instance, a blanket ban will be imposed.

Visiting practitioners who work directly with children are subject to the same restrictions as school staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes only and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

Online Safety

Children and young people commonly use electronic equipment including mobile phones, tablets and computers daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat, Tik Tok and Instagram. Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

The school's online safety policy explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. The school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material. We will complete an annual review of our online safety policy which will be supported by an annual risk assessment. This will consider and evaluate any emerging risks our students face when participating in online activity.

Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below). Serious incidents may be managed in line with our child protection procedures.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns.

The school's online safety co-ordinator is: Ben Lough

Online communication between staff and pupils

Staff must be aware of the acceptable use policy and this should give advice regarding personal online activity, use of social networking and electronic communication. Under no circumstances is it acceptable for staff to communicate via personal devices / social media with pupils. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action.

Education at home

Wherever possible the school will seek to have a meeting with the family and LA when there is a request for elective home education to ensure that there is a smooth transition for the pupil. Schools will notify the Local Authority when parents inform them a child is to be home educated.

Advice to support schools and colleges has been produced for online learning at home: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#)

Appendix 1

Specific Safeguarding Concerns

Physical Abuse

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens.

Babies and disabled children also have a higher risk of suffering physical abuse, and physical abuse in young children is more likely to lead to permanent injury or fatality.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be able to observe it, for example, in the way that a parent interacts with their child.

Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another, which includes coercive control and domestic abuse. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse & Exploitation

Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong.

Sexual abuse can have a long-term impact on mental health. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women and children are also perpetrators.

Child sexual exploitation 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 doesn't 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.

Neglect

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse. Neglect usually indicates a relationship issue between the parent and child.

A key task for staff and volunteers is to record all instances of neglect, however minor. This builds up a picture of the child's lived experience and provides the crucial evidence required at point of referral. There are many different aspects in which neglect can manifest:

- Physical Neglect or Deprivation of Needs
- Medical Neglect
- Supervisory Neglect
- Environmental Neglect
- Educational Neglect
- Emotional Neglect

Domestic Abuse

Waltham Forest has adopted the Safe & Together model of working with children affected by domestic abuse. This includes working in partnership with the abused parent and holding the perpetrating parent to account. Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

The school works in partnership with Police and Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called [Operation Encompass](#). It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will forward the information securely to the DSL before the child or children arrive at school the following day.

On receipt of any such notification, the headteacher and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due care and sensitivity. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. This information is managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Lives: young people and domestic abuse.](#)

Children who are looked after or were previously looked after

Children who were previously looked after, such as those adopted or under Special Guardianship Orders, potentially remain vulnerable. The school ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

The designated teacher for children who are looked after and previously looked after and the DSL hold details of the social workers for all children who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after.

Children with Special Educational Needs and Disability (SEND)

Children with special educational needs (SEN) and/or disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded. Staff can recognise the additional risks that children with SEND face online, for example from online bullying, grooming and radicalisation and are confident they have the capacity to support SEND children to stay safe online.

Contextual safeguarding

Contextual safeguarding means that assessments of children should consider whether wider environmental factors which are present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that

would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm. Hampden Gurney will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care.

Child Criminal Exploitation (CCE)

Westminster has taken a public health approach to children and young people's criminal exploitation by organized criminal groups (OCGs) and gangs. CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.
- through violence or the threat of violence

The victim may have been criminally exploited even if the child does not view themselves as a victim. CCE does not always involve physical contact; they can also occur using technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (see section below on County Lines), forced to shoplift or pickpocket or to threaten other young people. Victims of CCE can be of any gender. Children and young people are often unwittingly drawn into criminal exploitation through the offer of friendship, relationships and care, gifts, drugs, alcohol, money and accommodation. Some of the following can be indicators of CCE.

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; they can also occur using technology. Victims of CSE can be of any gender, under the age of 18, including 16 and 17 years old who can legally consent to have sex. It can include both contact and non-contact sexually activity and

may occur without the child or young person's immediate knowledge. Some of the indicators of CCE can also be indicators of CSE, as can:

- children who have older boyfriends/girlfriends
- children who suffer from sexually transmitted infections or become pregnant

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. 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. The Department for Education have produced: [Child sexual exploitation: definition and guide for practitioners](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence/harm) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered.

All concerns about children suspected to be at risk of or involved in county lines will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required. The Home Office has released guidance: [County lines: criminal exploitation of children and vulnerable adults](#)

Serious violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern.

Indicators may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. Immediate action should be taken with in response to any mental health concerns about a child that is also a safeguarding concern, through reporting the concern to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges) has been published.

Children with family a member in prison

Children and young people who have a family member in prison should be supported appropriately. Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Hampden Gurney will seek to support pupils/students in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

For more information, see: [Action for Prisoners' Families](#). The Prisoners' Families Helpline is 0808 808 2003.

Children Missing from Education

Full attendance at Hampden Gurney is important to the wellbeing of all pupils and enables them to access the opportunities made available to them at school. Non-attendance is also an indicator in all forms of abuse. The attendance policy is set out in a separate document and is reviewed regularly by the governing body. The school operates in accordance with statutory guidance [Children Missing Education \(DfE 2016\)](#). All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, radicalisation or mental health problems. Staff will also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Attendance, absence and exclusions are closely monitored, and same day checks are undertaken on the first morning of absences.

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing repeatedly and/or are missing for periods during the school day.

A conversation should take place with the Home Education Lead in the local authority if DSL has concerns about children whose parents wish to elect to home educate.

Children who run away or go missing from home or care

Hampden Gurney recognises that children who run away or go missing (particularly repeatedly) and are thus absent from their normal residence are potentially vulnerable to abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

[Keeping Children Safe in Education](#) 2021 highlights that [Statutory Guidance on Children who Run Away or go Missing from Home or Care](#) 2014 requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return. RHIs are intended to ascertain the factors that triggered the young person's absence. Those factors may include difficulties at home, in school and in

the community. The short timescale of 72 hours is imposed in order to ensure that the RHI remains relevant to the young person and enables any required action to be initiated at the earliest opportunity. RHIs are undertaken by practitioners who are independent in order to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receives notification that a young person has gone missing from home or care, a letter will be sent to parents/carers seeking their consent to an RHI with their son/daughter. Direct contact will then be made with parents/carers and the young person to plan for the interview. In order to fulfil the timescale of within 72 hours, it is essential that all opportunities to interview young people including times during the school/college day are utilised.

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most carried out without anesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth and risks to the unborn child. FGM is carried out on girls of any age, from newborn to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

The practice is illegal under the [Female Genital Mutilation Act](#) 2003. Any person found guilty of an offence under the [Female Genital Mutilation Act](#) 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

Teachers are subject to a statutory duty defined by Section 5B of the [Female Genital Mutilation Act](#) 2003 (as inserted by section 74 of the [Serious Crime Act](#) 2015) to report to the Police personally where they discover (e.g., by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police.

Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence/harm and abuse. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading

role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the [Anti-Social Behaviour, Crime and Policing Act 2014](#).

Homelessness

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

Prevent: Protecting Children from Radicalisation & Extremism

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

Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the DSL is responsible for the school's strategy for protecting children from those risks.

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

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target and groom young people. Young people who feel isolated or disaffected in some way, are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

Hampden Gurney has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Hampden Gurney is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. Hampden Gurney promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

Hampden Gurney recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL or DDSL will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

[Channel](#) is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be considered at the Local Channel panel. The Channel panel is made up of multi-agency professionals who discuss the individuals referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. The DSL may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: [Channel guidance](#).

The Home Office has developed three e-learning modules:

- [Prevent awareness](#) e-learning offers an introduction to the Prevent duty.
- [Prevent referrals](#) e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness](#) e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.
- [Educate Against Hate](#) is a government website designed to support schoolteachers and leaders to help them safeguard their students from radicalisation and extremism.

- The Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#).

Private Fostering

A [private fostering](#) arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under 18 if the child is disabled. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, the school will encourage parents and private foster carers to notify Children's Social Care and will share information with Children's Social Care as appropriate.

So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

Regardless of the motivation, staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police, and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit for advice as necessary.

Bullying and peer on peer abuse

Hampden Gurney believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other students in the school.

Children may be harmed by other children or young people; research suggests that 30% of child abuse is perpetrated by those under 18.

All staff recognise that children can abuse their peers and are trained to understand and implement the school's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously. Advice and guidance has been produced [Preventing and Tackling Bullying](#)

It is most likely to include, but is not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence/harm, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
- Up skirting, is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence, which comes under The Voyeurism (Offences) Act 2019. Anyone of any gender, can be a victim;
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the Hampden Gurney's anti-bullying procedures.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls'. It is important for Hampden Gurney to consider the wider environmental factors and context within which peer on peer abuse occurs.

The school will also consider the potential for the impact of the incident to extend further than the school /local community (e.g. for images or content to be shared around neighbouring schools) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities.

There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk/>

Sexual violence/harm/and sexual harassment

Sexual violence/harm, sexual harm and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Staff are aware of sexual violence/harm and the fact children can, and sometimes do, abuse their peers in this way. Sexual violence/harm and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable.

Children who are victims of sexual violence/harm and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. While it is important that all victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls, children with SEND and LGBT children are at greater risk of sexual violence/harm and sexual harassment and more likely it will be perpetrated by boys.

When referring to sexual violence/harm, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- A child under 18 cannot consent to any sexual activity with a person in a position of trust
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence/harm.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence/harm. Hampden Gurney therefore acknowledges the importance of recognising the nature of, identifying and challenging sexual violence/harm and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies; and through the curriculum. All staff recognise the importance of:

- making clear that sexual violence/harm and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence/harm or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, lifting skirts and up skirting.
- Dismissing or tolerating such behaviours risks normalising them.

The school will respond to reports in accordance with Part 5 of [Keeping Children Safe in Education](#) 2021. Schools may also find it useful to refer to the [Farrer peer on peer abuse toolkit](#). All responses to reports of sexual violence/harm will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using their professional judgement and supported by other agencies, such as children's social care and the Police.

The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Risk assessment

- The risk and needs assessment will consider:
 - the victim, especially their protection and support;
 - the alleged perpetrator/s (if she/he/they attend the same school/college); and
 - all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.
- The DSL or DDSL should ensure they are engaging with children's social care and specialist services as required.
- Police are notified when a crime may have occurred.
- Where there has been a report of sexual violence/harm, it is likely that professional risk assessments by social workers and or sexual violence/harm specialists will be required.

Action following a report of sexual violence, harm and/ or sexual harassment - what to consider

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the school's initial response.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence/harm and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the school not to tell anyone about the sexual violence/harm or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children;
- 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;
- whether there are ongoing risks to the victim, other children, adult students or school/college staff;
- informing parents/carers unless this would put the victim at greater risk);

- only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation.

Children sharing a classroom - initial considerations following a report of sexual violence/harm/harassment

Any report of sexual violence/harm or harassment is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult regarding the victim and proximity with the alleged perpetrator is likely to be especially distressing. Whilst the school/college establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on school/college premises and on transport to and from the school/college, where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

For other reports of sexual violence/harm and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school/college premises and transport, will be considered immediately. In all cases, the wishes of the victim, the nature of the allegations and the protection of all children in the school or college will be especially important when considering any immediate actions.

Youth produced sexual imagery (YPSI) or 'sexting'

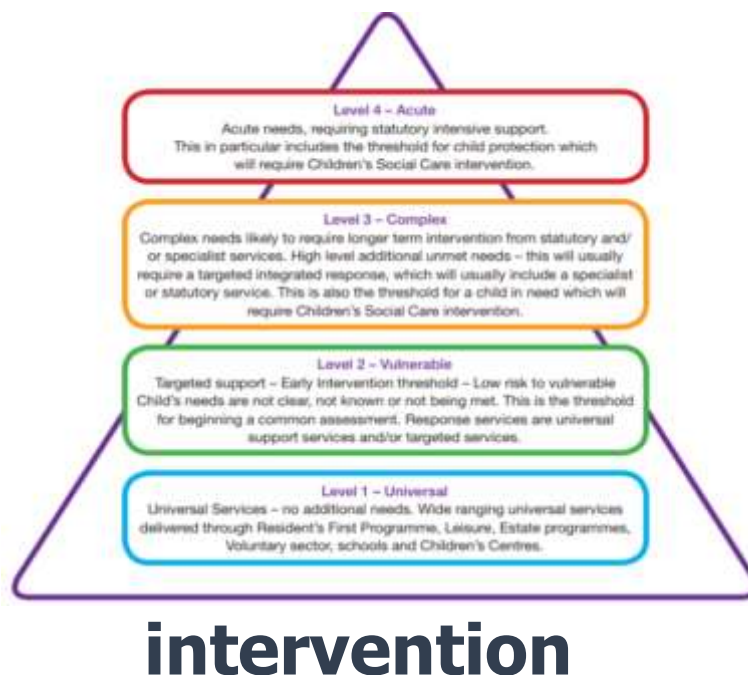
The school will act in accordance with advice endorsed by DfE [Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety 2017\)](#). All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern always will be the welfare and protection of the young people involved. Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. Still, authorities will avoid criminalising young people unnecessarily.

All incidents of YPSI should be reported to the DSL. If there is a YPSI issue in relation to a device (e.g., mobile phone, tablet, digital camera), the member of staff will secure the device (i.e., it should be confiscated). This is consistent with DfE advice [Searching, Screening and Confiscation - Advice for headteachers, school staff and governing bodies 2018](#). Staff will not look at (unless directed to do so by police), copy or print any indecent images as this would be a criminal offence. The confiscated device will be passed immediately to the DSL. The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will 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. If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police via the MASH immediately. The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental (e.g., a child sending an image to a child with whom they are romantically involved) or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured. Aggravated incidents of sexting will be referred to MASH.

Thresholds for social care



Level 1 – Universal

Universal services are key partners in the delivery of a preventative approach to improving outcomes for children and young people. Services delivered at the universal level meet the needs of most children and young people. These 'universal services' are those services (sometimes also referred to as mainstream services) that are provided to or are routinely available to, all children and their families. Universal services are designed to meet the sorts of needs that should enhance the lives and wellbeing of all our children.

Most children will not require intervention beyond the universal level of support within the borough available to all children – these will not require social care intervention.

Level 2 – Vulnerable

Vulnerable needs requiring targeted support, when the needs of the child can no longer be fully met within Universal provision. These children and their families may have low level additional needs that are likely to be short term and that are sometimes known but unmet. In this context, a Common Assessment should be completed with the family and child or young person. At this point the Team around the Child and Family processes should commence if support is required from more than one professional service. The team is coordinated by a Lead Professional to provide a consistent link for the family.

<https://fisd.westminster.gov.uk/kb5/westminster/fis/advice.page?id=a4tQfDNT4aM> lays out the agreed thresholds for intervention at different levels of risk to children and young people

within Westminster. Early Help intervention requires parental consent and engagement. Providing early help is more effective in promoting the welfare of children than reacting later. The aim is to prevent further issues arising and current issues escalating. In cases where consent is not given for an early help assessment, practitioners should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately Mash.

Level 3 – Complex

For children and young people whose needs are complex, the lead professional will be a social worker who will work closely with the child and family to ensure a single assessment and deliver the right support and intervention. These children will be eligible for social care services, outlined in a Children in Need plan, because they are at risk of moving to a higher threshold for intervention from specialist services. In most cases the social worker will act as the lead professional to coordinate the work of all agencies with the child and family. "Asset" is the risk assessment tool used to assess the likelihood of a Young Person going on to commit an offence and to identify what areas of work need to be undertaken to reduce this risk.

Section 17 of the Children Act 1989 places a general duty on every Local Authority to safeguard and promote the welfare of children living within their area who are in need and to promote the upbringing of such children, wherever possible by their families, through providing an appropriate range of services. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Level 4 – Acute

Acute Specialist Services are required where the needs of the child or young person are so great that statutory and /or specialist help, and intervention is required to keep them safe or to ensure their continued development. These span the multi-agency partnership including; Children's Social Care, Child and Adolescent Mental Health Services and Level 3 and 4 Youth Offending Services.

By effective integrated working in Westminster, we aim to reduce the escalation of those children and families requiring targeted support to prevent more children requiring specialist and statutory interventions. To ensure the right support, in the right place at the right time. In Westminster we are developing a confident integrated workforce with a common core of knowledge and understanding to support and intervene effectively to safeguard children young people and families.

A very small number of children for whom targeted support will not be enough will have more significant and acute needs which meet the threshold for Stage 4 intervention. This includes children who are experiencing significant harm or where there is a likelihood of significant harm and children at risk of removal from home.

s47 or Child Protection intervention is the process for children where there is reasonable cause to suspect that the child is suffering or likely to suffer significant harm (this includes immediate protection for children at serious risk of harm).

Appendix 3

Designated Safeguarding Lead

A Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team, appointed to support the management of safeguarding cases within the school. The DSL should take lead responsibility for safeguarding and child protection (including online safety). The DSL should be given the time, funding, training, resources and support to undertake duties as listed below. Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility should not be delegated.

The DSL and DDSL should undergo training to provide them with the knowledge, skills and confidence required to carry out the role. This training should be updated every two years. In addition to the training, DSLs and DDSLs should update their knowledge and skills at regular intervals and at least annually. The Deputy Designated Safeguarding Lead/s (DDSL) are trained to the same level as the DSL and can take over seamlessly in the event of the DSL being absent.

During term time, the DSL and/or DDSL should always be available between 8am and 6pm for staff in the Hampden Gurney to support and/or discuss any safeguarding concerns. A duty rota will be organised to provide staff with advice, information and signposting out of hours and over weekends / school holidays in the event of an emergency.

The DSL role includes, but is not limited by, the following:

Management of referrals

- Refer cases of suspected abuse to children's social care and police as appropriate. [NPCC- When to call the police](#) should help DSLs to understand when they should consider calling the police and what to expect when they do.
- Refer cases to the Channel programme where there is a radicalisation concern as appropriate.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as appropriate.

Provides Advice and Support

- Acts as a source of advice, support, expertise and liaison to the Hampden Gurney community.
- Liaise with the headteacher to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigation

- Liaises with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Support staff who make referrals to Children’s Social Care
- Support staff who make referrals to the Channel programme

Provides Expertise

- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in Parts 1 & 5, and Annex A, B and C of [Keeping Children Safe in Education](#) 2021, ensuring that all staff receive necessary training, information and guidance
- Understands the assessment process for providing early help and statutory intervention, including the criteria making a referral to MASH.
- Has working knowledge of how a child protection case conference and a child protection review conference is undertaken by children’s social care and be able to attend and contribute to these effectively when required to do so
- Understands relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulations;
- Understands the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners; [Data protection: a toolkit for schools](#) 2018, guidance developed to support schools with data protection activity, including compliance with GDPR.
- Understands and supports the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understands the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Understands that children can be at risk of abuse or exploitation in situations outside their families.
- Understands the local multi-agency safeguarding arrangements and procedures and links with the safeguarding partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Maintains & Manages Records

- Keeps detailed records in confidential files, ideally via an online safeguarding recording system, that are separate from the main pupil file and stored securely. Files records need to be dated with a clear record of who entered the record

- Ensures that, when a pupil under the age of 11 years leaves Hampden Gurney, all child protection records are passed to the new setting (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children's Social Care, the pupil's social worker is also informed.

Champions Children's Wellbeing

- Encourages a culture of listening to and taking account of children's wishes and feelings.
- Is alert to the specific needs of children with special educational needs, children in need, children subject to child protection or care proceedings, children in care, young carers, children with particular vulnerabilities in order to provide effective pastoral support and liaison with other agencies.
- Ensures that children and young people are supported to be able to identify risk in their lives or those of their peers in an age-appropriate way, and that they know how they can report it.
- Is responsible for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifies the impact that these issues might be having on children's attendance, engagement and achievement at Hampden Gurney.
- Oversees pastoral care in Hampden Gurney.
- Ensuring the appointment of a Designated Teacher for children who are looked after by the local authority and those who have left care through adoption, special guardianship or child arrangement orders, or who were adopted from state care outside of England.
- Helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.
- Support teaching staff to identify the challenges that children who are experiencing or have experienced welfare, safeguarding and child protection issues might face and the additional academic support and adjustments that they could make to best support these children.
- Understands that children may find it difficult to approach staff to express their concerns therefore has put in place additional measures that help to support children to be able to do this.

Primary point of contact for safeguarding

- Act as a point of contact with the three safeguarding partners
- Attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings.

- Co-ordinates Hampden Gurney contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies, including the local safeguarding partnership.
- Works in partnership with social workers and with safeguarding partnership to support the child.
- Notifies social care if a child-on-child protection is absent for more than two days.

Supports and Liaises with Parents, Carers & Families

- Ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the safeguarding policies are made publicly available (e.g., on the website) and are easily accessible to all (staff, parents, children, those for whom English is not a first language).
-

Sets and Communicates Policy

- Updates safeguarding policies (safeguarding, child protection, online safety, safer recruitment, code of conduct, etc) annually in line with the Local Safeguarding Partnership and statutory requirements
- Ensures that all staff sign to indicate that they have read and understood:
 - [Keeping Children Safe in Education](#) 2021 (Part 1 for all staff; Part 1, Part 5, Annex A and C for all classroom-based staff)
 - The child protection and safeguarding policy
 - The staff behaviour policy (code of conduct)
 - The behaviour policy including de-escalation tactics, and are trained on acceptable restraint
 - Hampden Gurney safeguarding response to children who go missing from education
 - The role of the designated safeguarding lead & how to get in touch
- Ensures that the child protection and safeguarding policy and procedures are reviewed and updated at least annually, working with the whole school/college community of pupils, parents, staff, volunteers and governors and/or proprietors regarding this.
- Keeps a record of staff attendance at child protection training.

Coordinates Training & Induction

- Develops a training strategy to ensure that all staff obtain the appropriate training / updates, skills and knowledge to safeguard children effectively within the local Safer Partnership requirements.
- Undertakes appropriate training themselves, including attending regular DSL Forums, and is given appropriate time and resources to carry out the role.
- Ensures that all staff understand that if they have any concerns about a child's welfare, they should act on them immediately, either by speaking to the DSL or DDSL

or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.

- Ensures that all staff know how to make a referral to children's social care.
- Quality assures casework by other staff, possibly through supervision.
- Ensures each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;

Ensures Safer Recruitment / Management of Allegations against Staff & Volunteers

- Ensures Safer Recruitment as per the Safer Recruitment policy; develops safeguarding induction strategy for all new / temporary staff.
- Ensures all staff, including temporary staff and volunteers have read the school's safeguarding policy and the Code of Conduct / Behaviour Policy prior to access to children.
- Ensures that the headteacher is aware of the responsibility under [Working Together to Safeguard Children](#) 2018 to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff (including supply staff) or volunteer to the Designated Officer in the Local Authority (LADO) within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

Appendix 4

Standards for Effective Child Protection Practice in Schools

The school's child protection and safeguarding responsibilities are inspected under the 'Leadership and Management' judgement in Ofsted inspections. The following standards may assist schools in evaluating their practice. They should be used jointly by the Designated Safeguarding Lead and the Designated Link Governor for Safeguarding to ensure the school is effective in safeguarding and child protection matters.

In best practice, schools:

- Have an ethos in which children feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to;
- Provide suitable support and guidance so that pupils have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
- Work with parents to build an understanding of the school's responsibilities to safeguard and promote the welfare of all children and a recognition that this may occasionally require children to be referred to investigative agencies as a constructive and helpful measure;
- Ensure all staff can identify children who may benefit from early help; provide co-ordinated offers of early help; and ensure that children receive the right help at the right time to address concerns and risks and prevent issues escalating;
- Are vigilant in cases of suspected child abuse, recognising the signs and symptoms, have clear procedures whereby all members of staff report such cases to the Designated Safeguarding Lead or – in her/his absence – the deputy Designated Safeguarding Lead, and are aware of Local Authority and procedures so that information is passed on effectively to the relevant professionals;
- Monitor children who have been identified as in need of early help or at risk; maintain clear records of pupils' progress and welfare *in a secure place*; maintain sound policies on confidentiality; provide appropriate information to other professionals; and submit reports to and attend child protection conferences;
- Provide and support regular child protection training and updates for all school staff and ensure that Designated Safeguarding Leads attend refresher training every two years to ensure their skills and expertise are up to date; and ensure that targeted funding for this work is used solely for this purpose;
- Contribute to an inter-agency approach to safeguarding and child protection by developing effective and supportive liaison with other agencies;
- Use the curriculum to teach children about safeguarding and raise their awareness and build confidence so that pupils have a range of contacts and strategies to identify

risk, know who they can talk to about anything causes them concern and understand the importance of protecting others;

- Provide clear policy statements for parents, staff and children and young people on this and on both positive behaviour policies and the school's approach to bullying;
- Have a clear understanding of the various types of bullying and peer on peer abuse – face to face, online, physical, verbal, sexual, prejudice based and indirect - and act promptly and firmly to combat it, making sure that pupils are aware of the school's position on this issue and who they can contact for support;
- Have a clear understanding of the signs and impact of racist, disability, homophobic, transphobic and teenage relationship abuse; and a clear commitment to identifying and challenging those forms of abuse in order to safeguard children and maintain the safeguarding culture of the school.
- Take particular care that pupils with SEN in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively with attention paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communication skills;
- Have a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in [Keeping Children Safe in Education 2021](#) and [London Child Protection Procedures 2017](#).
- Have a written whole school safeguarding policy, which is produced, owned and regularly reviewed by all school staff, considering the views of children, parents/carers and governors, and which clearly outlines the school's position and positive action in respect of the standards;
- Ensure that specified information is passed on in a timely manner to the Local Authority for monitoring purposes;
- Have a Single Central Record in place that fully complies with the guidance in [Keeping Children Safe in Education 2021](#).
- Ensure appropriate arrangements are in place in relation to external professionals visiting children on site including ensuring they have read and understood the child protection policy.

For advice and support about any safeguarding matter in school or for information about a range of safeguarding training courses, please contact the Education Safeguarding Service:

Email: safeguardingineducation@westminster.gov.uk

Telephone: 020 76417668

Appendix 5

Safer Recruitment

Hampden Gurney will ensure that their Safer Recruitment policy is in place and updated annually, and that it is followed meticulously for the recruitment of all permanent and temporary staff and volunteers.

Safer recruitment means that the school will ensure the following:

1. Planning and Advertising

- Every job description and person specification include responsibility for safeguarding

2. Interview

- At least one interview question about attitude to safeguarding and working with children
- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities
- At least one member of each recruitment panel will have attended safer recruitment training

3. Vetting

- Obtain references for all shortlisted candidates via reference proforma, including internal candidates, and follow up by phone
- Carry out additional or alternative checks for applicants who have lived or worked outside the UK
- Ensure that applicants for teaching posts are not subject to a prohibition order
- *Academies, independent schools and free schools* – check that applicants for management positions are not the subject of a s128 direction prohibiting or restricting them from taking part in the management of an independent school, academy or free school.
- *Maintained schools* – check that governors are not the subject of a s128 direction prohibiting or restricting them from taking part in the management of an independent school, academy or free school because a person subject to one is disqualified from being a governor.
- Applicants only begin work after providing DBS certificates. Exceptionally, if an individual starts work in the regulated activity before the DBS certificate is available, the individual must be appropriately supervised, and the employment remains conditional on suitably clear checks.
- Barred List checks will always be taken prior to the individual starting to work in a school or college.

4. Appointment

- Offers of employment are fully conditional on unblemished DBS certificate (or a risk-assessed blemished DBS certificate that meets a high standard of safeguarding) and full references, using a references proforma (that requests whether candidates would be re-employed for the same post and whether there have ever been any safeguarding concerns), followed up by phone.

5. Induction

- Once appointed, a full safeguarding induction process must be put in place for all new staff, that includes rigorous monitoring in order to pick up any concerns early.
- All staff are required to sign to confirm they have received a copy of the safeguarding policy and Staff Behaviour Policy (code of conduct), and that they have read [Keeping Children Safe in Education](#) 2021.
- All relevant staff (teachers, teaching assistants, other classroom-based staff, lunchtime supervisors and members of the senior leadership team) and all those who work in before or after school care for children under eight are made aware of the disqualification legislation.

6. Third Party Organisations

- Hampden Gurney obtains written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children.
- Hampden Gurney will ensure that any staff from third party organisations have suitable and up-to-date training in safeguarding.
- Trainees and Students on placements should be subject to the same checks as other members of staff. However, fee-funded trainee teachers' checks should be carried out by the training provider and should be judged by the provider to be suitable to work with children. The school is not required to record details of fee-funded trainees on the Single Central Record. However, the school requires written confirmation from the provider that these checks have been carried out and are satisfactory.

7. Recording

- The school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of [Keeping Children Safe in Education](#) 2021 and guidance.

8. Ongoing training & management of concerns and allegations

- See sections above

Safer recruitment means that all **job applicants** will:

- **Complete an application form** which includes their employment history and explains any gaps

- **Provide two referees**, including the current employer, and at least one who can comment on the applicant's suitability to work with children. References should be requested by using a proforma that asks directly about whether there have ever been any safeguarding concerns raised and whether the applicant would be hired again for the same position; references should be followed up by phone.
- **Provide evidence** of identity and qualifications
- **Be checked in accordance with the Disclosure and Barring Service (DBS)** regulations as appropriate to their role if offered employment. This will include:
 - an enhanced DBS check and a barred list check for those including unsupervised volunteers engaged in Regulated Activity;
 - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
 - an enhanced DBS check for all governors (not including associate members), which will only include a barred list check for governors involved in Regulated Activity
- Provide evidence of their right to work in the UK, if offered employment
- Be interviewed by a panel of at least two school leaders/governors with at least one member of the panel trained in Safer Recruitment in the past three years, if shortlisted.

Hampden Gurney endeavours to only employ suitable staff and allow suitable volunteers to work with children by complying with the requirements of [Keeping Children Safe in Education 2021](#) together with the school's and the *Safer Recruitment* policy.

Schools & Colleges are 'specified places' which means that most staff and volunteers will be engaged in Regulated Activity.

Volunteers

- Volunteers will undergo checks commensurate with their work in the school and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.
- Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Contractors

- The school/college checks the identity of all contractors and their staff on arrival at the school/college and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in regulated activity, barred list checks are also requested.

- Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

Safer Recruitment Proforma: Model Reference Request Form

Name of Applicant:					
Post Applied for:					
What is the name of your organisation?					
What position do you hold in relation to the applicant?					
How long have you worked/did you work with the Applicant?					
Applicant's role and/or duties held					
Applicant's dates of employment:					
Employment commenced:			Employment ended:		
<p>Please confirm below the reason for the termination of the Applicant's employment. If the Applicant was dismissed, please explain the reason for the Applicant's dismissal and the surrounding circumstances.</p>					
Please rate the Applicant against the following criteria:	Needs substantial development	Needs development	Acceptable	Strong	Outstanding
	Attitude to work				
	Reliability				
	Working relationships				
	Skill Experience				
Has the Applicant been the subject of disciplinary proceedings (whether formal or informal) during the last 12 months of their employment? If so, please provide			Yes / No *delete as appropriate, and provide details		

details of the allegation(s) against the Applicant and the outcome of the proceedings.	
Has the Applicant been the subject of allegations involving issues related to the safety and welfare of children or young people? If so, please provide details of the allegation (s) against the Applicant and the outcome of the proceedings.	Yes / No *delete as appropriate, and provide details
To the best of your knowledge, has the applicant ever been subject to investigation for a safeguarding reason? Please provide details.	Yes / No *delete as appropriate, and provide details
With reference to the attached job description, are you satisfied that the Applicant has the ability and is suitable to undertake this role? If not, please give specific reasons for your concerns.	Yes / No *delete as appropriate, and provide details
Are you completely satisfied that the Applicant is suitable to work with children? If, not please give specific reasons for your concerns.	Yes / No *delete as appropriate, and provide details
Would you be willing to re-employ the Applicant? If your answer is "No", please explain why.	Yes / No *delete as appropriate, and provide details
Please include any other information which you consider may be relevant to the Applicant's application?	
Signed:	Please print name:
Job Title:	Dated:

Telephone No:	Extension:
E-mail address:	
Organisation ` name and address:	
Official Stamp:	If you do not have an official stamp, then please attach this reference to signed headed paper/compliment slip.
For Requesting School use only: (Record details of conversation, who had conversation, and date, upon phone follow up)	

Appendix 6

Allegations against staff and volunteers (ASV)

If there are any concerns that a practitioner (including supply teachers) or volunteer has caused harm (emotional, physical, sexual, neglect) to a child, this represents an allegation against staff and volunteers.

All allegations against staff (including supply teachers) and volunteers must be reported to the Headteacher / Principal in the first instance. The person against whom the allegation is made should not be notified at this point.

The full procedures for dealing with allegations against staff can be found in Part 4 of [Keeping Children Safe in Education](#) 2021, and Part 7 of the [London Child Protection Procedures](#) 2017.

Initial Action by person receiving or identifying an allegation or concern

- Whilst allegations may be false, malicious or misplaced, they may also be founded in truth; all staff must report allegations even if they reasonably believe them to be false.
- All allegations must be investigated properly, in line with agreed procedures and outcomes recorded.
- Staff must treat all allegations seriously and keep an open mind.
- All low-level concerns should be discussed and decided upon in conjunction with LADO in congruence with local procedures.
- Make a written record of the information, including the time, date and place of incident/s, persons present and what was said and sign and date this.
- Immediately report the matter to the headteacher/proprietor.
- Do not share allegations with any other member of staff, including the subject of the allegation.
- If the allegation is against the headteacher, staff must report to chair of governors / trustees.
- If there is a lack of faith in the safeguarding governance, all staff can contact the local authority's Designated Officers (also known as LADOs) directly, without delay:
0207 641 7668 [/lodo@westminster.gov.uk](mailto:lado@westminster.gov.uk)

Threshold for statutory LADO involvement

As required by [Working Together to Safeguard Children](#) 2018, all allegations in respect of an individual who works at the school that fulfil any of the following criteria will be reported to the Designated Officer in the Local Authority (LADO) within one working day:

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

Child / children (victims)

- If children are identified as victims of harm, they must be protected from harm.
- If children are believed to have suffered / likely to have suffered significant harm, they must be referred to MASH.
- Concerns must be discussed with children's parents at the earliest opportunity; they must maintain confidentiality during the investigation phase of the LADO process.

Subject of allegations

- Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- Hampden Gurney will appoint a named contact person for the subject of the allegation, they will be advised to seek advice / support from a union rep; the employee assistance programme information will be shared.
- Hampden Gurney as employers have a duty of care to their employees. Effective support for anyone facing an allegation should be provided
- Where Hampden Gurney are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately, liaising with relevant parties (this includes supply teachers and volunteers,

Supply teachers

- Hampden Gurney will ensure allegations against supply teachers are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.
- Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
- Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.
- Hampden Gurney will take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.
- Supply teachers, whilst not employed by the Hampden Gurney, are under the supervision, direction and control of the governing body or proprietor when working in

the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support.

- The ASV meeting arranged by the LADO will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation.
- When using an agency, Hampden Gurney should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Suspension

- Suspension is not the default option and alternatives to suspension will always be considered.
- It is usually preferable if the child/ren involved in allegation and the practitioner in question are not in contact.
- In some cases, staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff, who will be in touch periodically as agreed upon suspension.

Confidentiality

- Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.
- In accordance with [Keeping Children Safe in Education](#) 2021, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Non-recent / historical allegations

- Allegations concerning staff who no longer work at the school or historical allegations will be reported to the Police.

False Allegations

- It is relatively rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. If, following investigation, it transpires that a child has made a false allegation, there may be other concerns regarding their welfare that may need to be unpicked or assessed.
- If an adult makes a false allegation and they are employed, this will result in disciplinary procedures. If an individual makes false allegation and police are involved, they may charge them with 'wasting police time' or 'perverting the course of justice'.

Behaviour in Personal Life

- As well as concerns related to conduct towards children, practitioners must be alert to their behaviour and events occurring in their private life. For example, if practitioners' own children become subject to child protection investigations, or if they exhibit worrying violent or sexual behaviour that could impact on their suitability to work with children.

Disqualification

Early Years & Childcare staff:

- Under [Disqualification under the Childcare Act 2006](#), as amended 31/08/18, disqualification by association still applies to practitioners working in schools with children up to and including reception during the school day.
- For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that checks are carried out to ensure that they are not disqualified under the [Childcare \(Disqualification\) Regulations 2009](#).
- Relevant / identified staff must self-declare that they are not disqualified.

All Staff:

- All practitioners must be alert to the amended guidance on disqualification which is no longer only in relation to staff working with children under 8 years. Their relationships and associations (including online) may have an implication for the safeguarding of pupils, and if there are concerns about that, practitioners must inform school.
- All staff should be alert to the fact that they are responsible for alerting school if their circumstances change.
- School will retain records of self-declarations on the Single Central Record.

Abuse of position of trust

- All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.
- In addition, staff should understand that, under the [Sexual Offences Act 2003](#), it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.
- Such a relationship will nonetheless always be viewed as a significant safeguarding concern and would constitute a reason for dismissal and referral to DBS for safeguarding reasons.

LADO Outcomes

The following definitions should be used when determining the outcome of allegation investigations:

- ***Substantiated allegations***

There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.

If the facts of the incident are found to be true but it is not found that a child has been harmed or there is a risk of harm, then consideration should be given to deciding that the outcome is 'unsubstantiated' or 'unfounded'.

- ***Malicious***

There is enough evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.

- ***False allegations***

There is enough evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive.

False allegations may be an indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should refer the matter to LA children's social care to determine whether the child needs services, or might have been abused by someone else.

- ***Unsubstantiated allegations***

There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

- ***Unfounded***

The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

The Chair of the meeting / discussion should make a record of the agreed outcome and forward this to the employer.

- References in cases where the allegation is false, unsubstantiated or malicious
 - Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.
 - A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference unless specifically asked for in a reference proforma. Please seek HR advice in this instance.

Record keeping in relation to the outcome of an investigation

- Details of allegations that are found to have been malicious should be removed from personnel records.
- For all other allegations, it is important that 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 decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.
- It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period.
- The record should be retained at least until the **accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.**

DBS Referrals

- Hampden Gurney has a legal duty to refer any person engaged to work in regulated activity in where the allegation has been substantiated, or where harm test has been met, irrespective of whether another body has made a referral to the DBS in relation to the same person; failure to do so is an offence.
- DBS referral can take place at any time during the Allegations / Disciplinary process – it should take place at the earliest stage possible. There could be times when you consider that you should make a referral in the interests of safeguarding children or vulnerable adults even if you have not removed the person from working in regulated activity; this could include acting on advice of the police or a safeguarding professional, or in situations where you don't have enough evidence to dismiss or remove a person from working with vulnerable groups. Making DBS referrals where the referral conditions are not met, will be done in consideration of relevant employment and data protection laws.
- DBS are required by law to consider all information sent to us from any source. This includes information sent to us where the legal referral conditions are not met. DBS will use legal powers and barring processes to determine whether the person should be barred from working in regulated activity with children and / or vulnerable adults.
- Harm, in this case, is not defined in legislation. DBS view harm as its common understanding, or the definition you may find in a dictionary. Harm is considered in its widest context and may include (This is not a fully comprehensive list; harm can take many different forms):
 - sexual harm

- physical harm
- financial harm
- neglect
- emotional harm
- psychological harm
- verbal harm

As an employer of practitioners and volunteers in a regulated activity, Hampden Gurney must make a referral when both of the following conditions have been met:

Condition 1

- Permission is withdrawn for a person to engage in regulated activity with children and/or vulnerable adults, including moving the person to another area of work that isn't regulated activity.
- This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Condition 2

- You think the person has carried out one (1) of the following:
 - engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm, or;
 - satisfied the harm test in relation to children and / or vulnerable adults. e.g., there has been no relevant conduct but a risk of harm to a child or vulnerable still exists, or;
 - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence
- When employing agency staff, both Hampden Gurney and agency have a responsibility to refer as above.
- Relevant conduct in relation to a child (a person under 18 years of age) includes:
 - endangers a child or is likely to endanger a child
 - if repeated against or in relation to a child would endanger the child or be likely to endanger the child
 - involves sexual material relating to children (including possession of such material)
 - involves sexually explicit images depicting violence against human beings (including possession of such images)
 - is of a sexual nature involving a child
- A person's conduct endangers a child if they:
 - harm a child
 - cause a child to be harmed
 - put a child at risk of harm
 - attempt to harm a child
 - incite another to harm a child

The full procedures for dealing with allegations against staff can be found in [Keeping Children Safe in Education](#) 2021.

Appendix 7

Signed Confirmation

I, _____ confirm that I have read Part One of Keeping Children Safe in Education 2021 [**delete as appropriate**] and Part 5 and Annex A and C in its entirety and understand my roles and responsibilities as set out in this guidance.

Signature:

Name:

Date:

Appendix 8

COVID-19

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19).

The Department for Education has issued non-statutory interim guidance on [safeguarding in schools, colleges and other providers during the coronavirus outbreak](#). This guidance supports governing bodies, proprietors, senior leadership teams and DSLs to continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual. [Latest COVID-19 advice and information](#) has been developed by Waltham Forest, which is updated according to any further changes.

Designated safeguarding leads (and deputies) should be provided with more time, especially in the first few weeks of term, to help them provide support to staff and children regarding any new safeguarding and welfare concerns and the handling of referrals to children's social care and other agencies where these are appropriate, and agencies and services should prepare to work together to actively look for signs of harm.

