



## Child Protection and Safeguarding Policy

<b>Approved by:</b>	Colfe's School Governors
<b>Last reviewed on:</b>	September 2025
<b>Next review due by:</b>	September 2026

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## Key School contacts

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<p><b>Designated Safeguarding Leads</b></p> <p><b>Senior School</b>  <b>Holly Beckwith</b>  TEL: 020 8463 8142  OUT OF HOURS TEL: 07823 347600  EMAIL: <a href="mailto:hbeckwith@colfes.com">hbeckwith@colfes.com</a></p> <p><b>Junior School</b>  <b>EYFS, KS1 and 2</b>  <b>Sue Gurr</b>  TEL: 020 8463 8265  EMAIL: <a href="mailto:sgurr@colfes.com">sgurr@colfes.com</a></p>
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## **Designated Teachers for Looked After Children**

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## Contacts of Key Local Services and Agencies

<p><b>Local Authority Designated Officer Greenwich</b> Laura Lumbis TEL; 020 8921 2247 or 3930 EMAIL: <a href="mailto:Childrens-Lado@royalgreenwich.gov.uk">Childrens-Lado@royalgreenwich.gov.uk</a> <a href="mailto:Rachel.Walker@royalgreenwich.gov.uk">Rachel.Walker@royalgreenwich.gov.uk</a> <a href="mailto:Laura.Lumbis@royalgreenwich.gov.uk">Laura.Lumbis@royalgreenwich.gov.uk</a></p>
<p><b>Local Authority Children’s Social Services and Multi-Agency Safeguarding Hub</b></p> <p><b>Bromley</b> TEL: 020 8461 7373/7379/7026 EMAIL: <a href="mailto:mash@bromley.gov.uk">mash@bromley.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0300 303 8671</p> <p><b>Greenwich</b> TEL: 020 8921 3172/2267 (consultation line) EMAIL: <a href="mailto:mash-referrals@royalgreenwich.gov.uk">mash-referrals@royalgreenwich.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8854 8888</p> <p><b>Lewisham</b> TEL: 020 8314 6660 EMAIL: <a href="mailto:mashagency@lewisham.gov.uk">mashagency@lewisham.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8314 3364</p> <p><b>Tower Hamlets</b> TEL: 020 7364 5006, Option 2 or 3 Extension: 5606 / 5601 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181 EMAIL: <a href="mailto:MAST@towerhamlets.gov.uk">MAST@towerhamlets.gov.uk</a></p>
<p><b>CAMHS</b> <b>Greenwich</b> Tel: 020 3260 5211 <b>Bromley</b> Tel: 020 3770 8848 <b>Lewisham</b> Tel: 020 3228 1000</p>
<p><b>Support and Advice Extremism</b></p> <p><b>If you think someone is in immediate danger, call 999 or the confidential Anti-Terrorist Hotline on 0800 789 321.</b></p> <p><b>Police</b> EMERGENCY: 999 NON EMERGENCY NUMBER: 101</p> <p><b>Local Authority Lewisham Prevent Team</b></p>

TEL: 07775 036482 or 07710 387930 EMAIL: [prevent@lewisham.gov.uk](mailto:prevent@lewisham.gov.uk)

**Greenwich Prevent Team**

TEL: 020 8921 8340

EMAIL: [community-safety@royalgreenwich.gov.uk](mailto:community-safety@royalgreenwich.gov.uk), [prevent@royalgreenwich.gov.uk](mailto:prevent@royalgreenwich.gov.uk) and [<Michael.Efthymiou@royalgreenwich.gov.uk>](mailto:Michael.Efthymiou@royalgreenwich.gov.uk)

PREVENT LEAD: Adam Browne and Michael Efthymiou

**Department for Education**

The DfE also has a dedicated telephone helpline, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email (see below). Note that this is not for use in emergency situations.

NON EMERGENCY NUMBER: 020 7340 7264

EMAIL: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

**Police – CAIT team (Child Abuse Investigation Team) Greenwich**

Bexley

[SEmailboxCAITreferralsBexley@met.police.uk](mailto:SEmailboxCAITreferralsBexley@met.police.uk)

Greenwich

[SEmailboxCAITreferralsGreenwich@met.police.uk](mailto:SEmailboxCAITreferralsGreenwich@met.police.uk)

Lewisham

[SEmailboxCAITreferralsLewisham@met.police.uk](mailto:SEmailboxCAITreferralsLewisham@met.police.uk)

**Police – NPCC link to ‘When to call the police’**

NPCC- [When to call the police](#)

**NSPCC Advice Line - general**

0808 800 5000 8am – 8pm Mon - Fri

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

**NSPCC Help line for people who have experienced abuse in education**

0800 136 663

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

**NSPCC whistleblowing advice line**

**Government Advice**

ADDRESS: Weston House, 42 Curtain Road London

EC2A 3NH

TEL: 0800 028 0285

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

<https://www.gov.uk/whistleblowing>

**Disclosure and Barring Service**

ADDRESS: DBS  
PO Box 3963  
Royal Wootton Bassett  
SN4 4HH

TEL: 03000 200 190

EMAIL: [dbsdispatch@dbs.gov.uk](mailto:dbsdispatch@dbs.gov.uk)

**Teaching Regulation Agency (TRA)**

ADDRESS: Ground Floor, South Cheylesmore House,  
5 Quinton Road, Coventry CV1 2WT

TEL: 020 7593 5393

EMAIL: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk)

**OFSTED Safeguarding Children**

TEL: 0300 123 4666 (Monday to Friday from 8am to  
6pm)

EMAIL: [Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

## I. Policy statement

The safety and welfare of all our pupils at Colfe's School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety.

In all matters relating to child protection the school will follow the procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Partnership (LSCP) which is Greenwich, together with DfE guidance contained in Working Together to Safeguard Children (December 2023) and Keeping Children Safe in Education (September 2025).

The School has arrangements for listening to children and providing early help. We follow the guidance from Greenwich Early Help Partnership in relation to providing good quality early help based on our learning of what positive outcomes.

The School has a duty to consider the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's responsibility** at Colfe's.

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

## 2. Aims

At Colfe's we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare and we will always act in the best interests of the child.

This policy is one way in which we ensure that all staff are aware of their statutory responsibilities with respect to safeguarding and are properly trained in recognising and reporting safeguarding issues

### 3. Scope and application

This policy is applicable to the whole school community, including those pupils in the Early Years Foundation Stage (EYFS) and considers at all times what is in the best interests of the child.

### 4. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#). [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy also takes into account the procedures and practice of Greenwich local authority as part of the inter-agency safeguarding procedures set up by the **Greenwich Local Safeguarding Children Partnership**. A full copy of their local procedures can be on their website: <https://www.royalgreenwich.gov.uk/site/>

This policy has regard to the following guidance and advice:

- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Information sharing: advice for practitioners providing safeguarding services May 2024
- The use of social media for on-line radicalisation July 2015
- Searching, Screening and Confiscation (July 2023)
- Use of Reasonable Force in Schools July 2013
- Preventing and Tackling Bullying July 2017
- Mental Health and Behaviour in Schools November 2018
- Teaching Online Safety in School January 2023
- Sharing nudes and semi-nudes: advice for education settings working with children and young people UKCIS December 2020
- Relationships Education, Relationships and Sex Education (RSE) and Health Education 2019
- When to call the police: guidance for schools & colleges NPCC
- Meeting digital and technology standards in schools and colleges March 2022

### 5. Definitions

**Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- 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

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix I explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix I defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 6. Statement of equality

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 7. Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour Management Policy
- Equality, Diversion and Inclusion Policy
- Anti-Racism Policy
- Harmful Behaviour and Abuse Policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly through Eudaimonia lessons in the Senior School, PSHE lessons in the Junior School, and PSED (Personal Social and Emotional development) in EYFS, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 7.1 All staff

All staff at Colfe's will:

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

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy DSLs, the behaviour policy, the e-safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education/who are absent from education. The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 19 of this policy outlines in more detail how staff are supported to do this.

## 7.2 The designated safeguarding leads (DSLs)

The DSLs for the Senior School and Junior School are members of the senior leadership team.

### Senior School

The DSL for the Senior School is Holly Beckwith, Director of Pastoral Care and the DSL for the Junior School is Susan Gurr, Deputy Head of the Junior School. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL for the Senior School can also be contacted out of school hours if necessary by email [HBeckwith@Colfes.com](mailto:HBeckwith@Colfes.com) or on 07823 347600. This number is available on the [pastoral signposting](#) page on Sharepoint.

In the Senior School, when the DSL is absent, the Deputy DSL – Justin Worley, Assistant Director of Pastoral Care – will act as cover.

The full team of Deputy DSLs in the Senior School includes: Kate Bateson (School Nurse), Spencer Drury (Director of Sixth Form), James Hope (Head of Glyn House), Katie Lindley (Head of Norton House), Jason Osei-Tutu (Head of Year 7), Claire Santry (Assistant Head Sixth Form, Pastoral). They will also act as cover when the DSL is unavailable.

The DSL in the Junior School can be contacted out of school hours if necessary by email

[SGurr@Colfes.com](mailto:SGurr@Colfes.com)

### **Junior School**

The DSL for the Junior School is the Deputy Head of the Junior School, Susan Gurr. She is also the DSL for EYFS.

In the Junior School, Dawn France and Gill Fisher are the Deputy DSLs and they will act as cover if the DSL is not available.

If the DSL and Deputy DSLs are not available in either the Senior School or the Junior School, Donna Graham, Deputy Head of the Senior School and Marie-Claire, Head of the Junior School will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Be Prevent lead: make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

### 7.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a safeguarding governor – currently Timothy Lister - to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

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

Section 19 of this policy has information on how governors are supported to fulfil their role.

#### **7.4 The headteacher**

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/carers when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Ensuring the relevant staffing ratios are met, where applicable

The Head of the Junior School is responsible for making sure each child in the Early Years Foundation Stage is assigned a key person

Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

## **8. Confidentiality and Data Protection**

Colfe's data protection policy can be found on the internal portal.

For the purpose of safeguarding, it is important to be aware that:

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

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

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3.

## 9. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must inform the DSL as soon as possible. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

**Please note – in this and subsequent sections, you should take any references to the DSL to mean ‘the DSL (or deputy DSL)’.**

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

- Make a referral to local authority children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**
- Tell the DSL (see key school contacts or section 7.2) as soon as possible if you make a referral directly.

#### How to make a referral to local authority children’s social care

- Use Edulink to find the pupil’s home address.
- Contact the local authority MASH team for the pupil’s home address using the telephone numbers below (advisable if a child is suffering or likely to suffer harm) or by submitting a referral form, using the links identified in the box below.
- If you do not know the local authority, then you can use the following link to help you identify which MASH team to contact: <https://www.gov.uk/report-child-abuse-to-local-council>
- What happens once a referral is made is outlined here: [Report child abuse - GOV.UK](#)

#### Contact information for local authority social services and multi-agency safeguarding hubs (MASH)

##### Local Authority Children’s Social Services and Multi-Agency Safeguarding Hub (MASH)

###### Bexley

TEL: 020 3045 5440

OUT OF HOUSE EMERGENCY DUTY TEAM TEL: 020 8303 7777 or 020 8303 7171

[Make a referral to Children's Social Care form | London Borough of Bexley](#)

###### Bromley

TEL: 020 8461 7373/7379/7026

EMAIL: [mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)

OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0300 303 8671

Referrals can be made via their portal: [MASH](#)

###### Greenwich

TEL: 020 8921 3172/2267 (consultation line)

EMAIL: [mash-referrals@royalgreenwich.gov.uk](mailto:mash-referrals@royalgreenwich.gov.uk)

OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8854 8888

Referral forms can be downloaded here: [Report your concerns about a child | Royal Borough of Greenwich](#)

#### **Lewisham**

TEL: 020 8314 6660

EMAIL: [mashagency@lewisham.gov.uk](mailto:mashagency@lewisham.gov.uk)

OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8314 3364

[MASH - Important Information](#) · [Lewisham Forms](#)

#### **Tower Hamlets**

TEL: 020 7364 5006, Option 2 or 3; Extension: 5606 / 5601 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181

EMAIL: [MAST@towerhamlets.gov.uk](mailto:MAST@towerhamlets.gov.uk)

Referral forms can be downloaded here [MAST request for support form](#)

**The documents and contact details below will also be useful in the scenarios that follow.**

#### **Police – NPCC link to ‘When to call the police’**

NPCC- [When to call the police](#)

#### **NSPCC Advice Line - general**

0808 800 5000 8am – 8pm Mon - Fri

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

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

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Reassure them that the allegation/complaint will be taken seriously and do not tell them they should have told you sooner. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a child ever be made to feel ashamed for making a report.
- Explain what will happen next and that you will have to pass this information on so we can find them the help they need. Do not promise to keep it a secret.
- Tell the DSL.
- Then, while making sure that the child is safe for the time being by taking them to the DSL or their Head of House, for example, write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it. The write up should be done on CPOMS, alerting the DSL. If on paper, sign and date the write-up and pass it on to the DSL. In either case, you should ensure that the DSL is informed either in person or via a phone call.
- Alternatively, if appropriate, make a referral to local authority children’s social care and/or the police directly (see 9.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

**None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.**

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

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

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

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

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

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

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL who will involve local authority children’s social care as appropriate.

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

Figure 1 below, before section 9.7, illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Please follow steps in section 9.1 to make a referral. Please note that the referral will need to be made to the borough or council in which the pupil resides.

### **Referral**

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

If you make a referral directly (see section 9.1), you must tell the DSL as soon as possible.

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

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

Please follow steps in section 9.1 to make a referral. Please note that the referral will need to be made to the borough or council in which the pupil resides.

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

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

### **9.6 If you have a concern about mental health**

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. It is obvious but should be stated that staff cannot diagnose mental health conditions. Our role is to signpost to support either in school with the school counsellor or externally, usually explored via a GP appointment in the first instance.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 9.1.

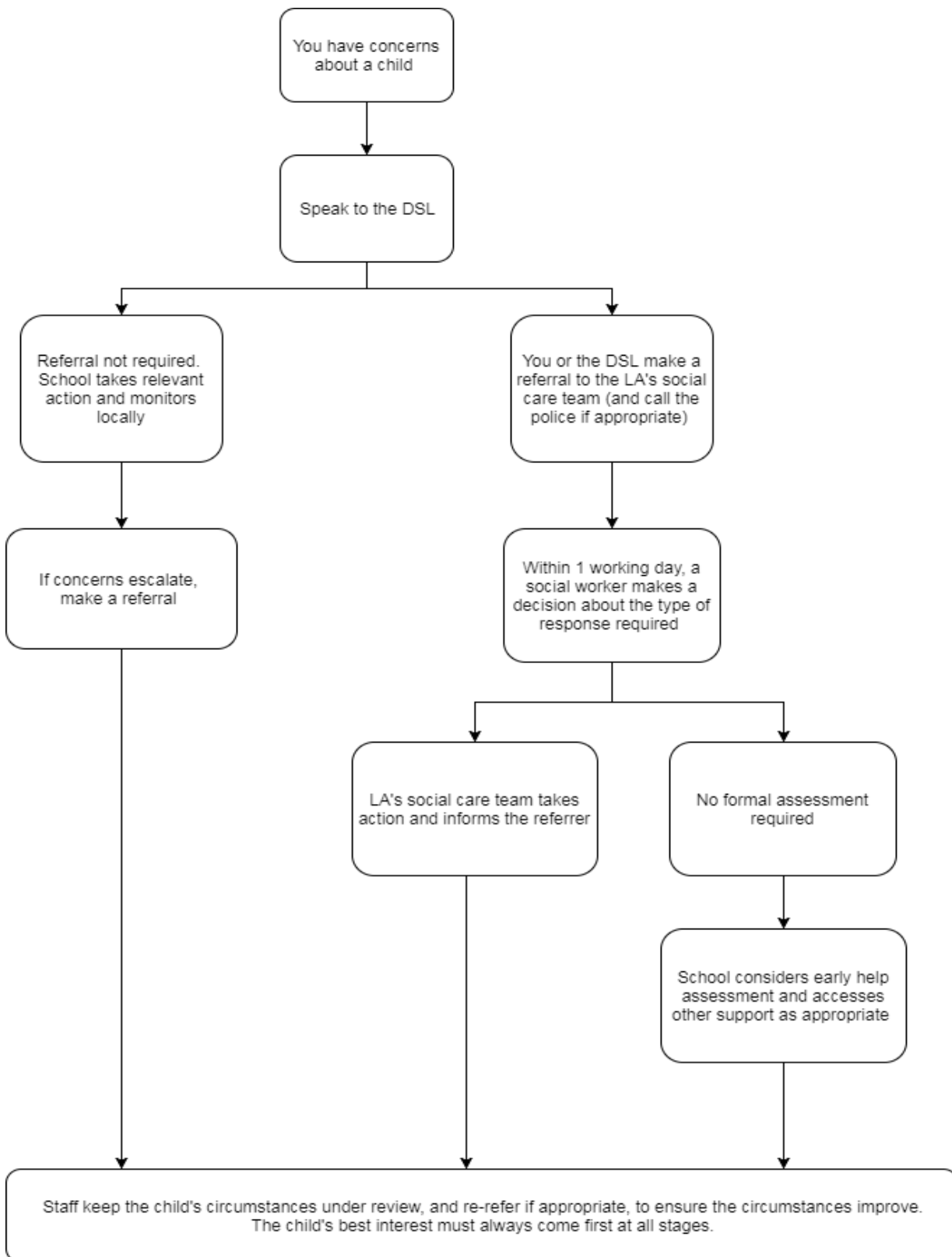
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. You should add a note of this concern as an incident on CPOMs.

The DSL and other members of the pastoral team will work in partnership with parents to create a support plan for pupils who are struggling with their mental health. As part of this, they may make a referral to CAMHS, particularly when there is a significant concern regarding mental health.

The Department for Education guidance on [mental health and behaviour in schools](#) contains more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 9.4 for what to do.)



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

The following steps should be followed if you have a concern that anyone working in the school has:

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

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

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

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

### **Head**

**Daniel Gabriele**

TEL: 020 8463 8102

EMAIL: [head@colfes.com](mailto:head@colfes.com)

### **Governors**

**Chairman of Governors**

**(via Clerk to the Governors)**

Matthew Pellereau

TEL: 020 8463 8112

EMAIL: [mpellereau@colfes.com](mailto:mpellereau@colfes.com)

### **Local Authority Designated Officer**

**Greenwich**

Laura Lumbis

TEL; 020 8921 2247 or 3930

EMAIL: [Childrens-Lado@royalgreenwich.gov.uk](mailto:Childrens-Lado@royalgreenwich.gov.uk)

[Laura.Lumbis@royalgreenwich.gov.uk](mailto:Laura.Lumbis@royalgreenwich.gov.uk)

## 9.8 Allegations of abuse made against other pupils

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

All child-on-child abuse is unacceptable and will be taken seriously.

The school recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. See Educational Visits Policy.

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

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

See our Child-on-Child Abuse policy for more information.

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

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

- You must record the allegation and tell the DSL, but do not investigate it. Records should be uploaded onto CPOMs at the earliest opportunity, but the priority is informing the DSL.
- It is important that it is recognised that children may not find it easy to tell staff about their abuse verbally and so it may take some time for a disclosure to be made.
- It is essential to reassure all children that they're being taken seriously, regardless of how long it has taken them to come forward and that they'll be supported and kept safe
- It is important to be aware that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, and so children may not be able to recall all the details or the timeline of the abuse.
- Certain children may face additional barriers in telling someone because of their disability, sex, ethnicity and/or sexual orientation.
- Abuse occurring online should not be downplayed and should be treated seriously in accordance with our zero-tolerance approach to abuse.

The DSL will then contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of Children's Services and/or the Police, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from Children's Services and/or the Police as appropriate.

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s). Decisions arising as part of a risk assessment might include, for example, whether the pupil against whom the allegation has been made should be removed or suspended from school for a period, or from certain classes, whether contact with certain individuals should be prevented or supervised and the availability of counselling.

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the Police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

This should be understood in conjunction with our:

Anti-Racism Policy

Behaviour Management Policy

Child on Child Policy

Harmful and Abusive Behaviours (Anti-Bullying) Policy

RSHE Policy and Statement

To achieve this, we will:

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

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys

Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 9.10 below)

Ensure staff reassure victims that they are being taken seriously

Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The Headmaster will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## 9.9 Sharing of nudes and semi-nudes ('sexting') and AI generated sexualised images

The following is based on [guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology](#) for [all staff](#) and for [DSLs and senior leaders](#).

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), **you must report it to the DSL immediately.**

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### Initial review meeting

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

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment

If there is a need to contact another school, college, setting or individual

Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

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

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting local neighbourhood police or dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education programme, as taught through Eudaimonia. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
- Teaching follows best practice in delivering safe and effective education, including:
- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

### **9.10 Reporting systems for our pupils**

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

To achieve this, we have:

Put systems in place for pupils to confidently report abuse:

All teachers seek to be approachable and are trained to deal with disclosures.

Heads of Houses and Assistant Heads of Houses have individual offices with an open-door policy and they are proactive in speaking with students when they have concerns.

The roles of the Designated Safeguarding Leads, Deputy Safeguarding Leads, the School Nurse and the School Counsellor are promoted in form time, PSHE sessions, RSE lessons (taught in our Eudaimonia programme in the Senior School), on Sharepoint, and on posters around the Senior and Junior school. The Junior School have a Speak Out Stay Safe week annually.

While we always encourage children to share their concerns directly with a trusted adult, we recognise that not every child may feel comfortable in so doing. A pupil can report anonymously by completing the anonymous reporting form, accessible via the student homepage on Sharepoint.

The anonymous reporting form, accessible via the student home page on Sharepoint, is also promoted in this way.

We make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

When a pupil has made a disclosure, we explain that we will take the pupil's wishes and feelings into account when determining what action to take and what services to provide but we will never promise confidentiality. We will explain to them that we may have to make decisions that do not align with all their wishes but they will always be for their safety and made in their best interests. We will keep them informed of the decisions taken and where appropriate, the reasons for these decisions.

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

The School's approach to online sexual harm is in line with guidance set out by the government in <https://www.gov.uk/guidance/child-online-safety-protecting-children-from-online-sexual-exploitation-and-abuse>

Please also consult our E-Safety Policy

External and school photographers are commissioned to take photographs and videos for both internal and external promotional use; this is under the direction of the Director of Admissions and Communications. Parents are given the opportunity to direct that their child's image is not published externally.

The Junior School's policy on the use of mobile phones and cameras in the setting can be found in the Mobile Phones and Media Policy (Junior).

In the Junior school mobile phones and cameras are not permitted to be used anywhere within the Junior School buildings except for school owned technology which is monitored. There must be no photography within the swimming pool area and at school productions; for the later a school photographer will be present, and photographs and videos taken are distributed to parents after the event. Video/photographic images of pupils can be taken by parents, carers or relatives at school events within the grounds, such as Sports Day. This is on the basis that they are for private retention and not for publication in any manner, including for use on personal websites.

Photographs and videos of EYFS children will only be taken by designated staff member/s. Where photographs and videos are taken by staff to give evidence of children's progress, or to upload on Tapestry for parents, only school cameras or ipads will be used. No photos may be taken on a member of staff's personal electronic device.

Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phone or camera in or around the EYFS setting. EYFS practitioners may find it helpful to read Safeguarding children and protecting professionals in early years settings: online safety considerations (February 2019).

### **Safeguarding children from potentially harmful and inappropriate online material**

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

To address this, Colfe's:

Has robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

Protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Sets clear guidelines for the use of mobile phones for the whole school community

Sets clear guidelines for the use of devices for the whole school community

Has clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

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

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum, Eudaimonia (in the Senior School) and PSHEE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation.

Online safety is an integral part of the school's curriculum and embedded in PSHEE and relationships and sex and health education (RSHE).

This includes teaching pupils about:

- the safe use of electronic equipment and the internet, including social media
- keeping personal information private
- the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.
- how to recognise unacceptable behaviour online
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The school's systems, which may change from time to time include: application whitelisting (certain types of files are blocked).

Pupils know that they will only connect to the school WiFi network to use the filtered internet and that they will not enable 3G/4G/5G during school time for their own protection and to protect the privacy of staff and students.

In accordance with new standards around filtering and monitoring introduced in KCSIE 23, we have followed the DfE's published guidance which sets out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet safeguarding standards.

Our governing body reviews the Cyber Standards and discuss with IT staff and service providers to support the school in meeting this standard through discussion with relevant staff.

Further detail of the school's approach to online safety can be found in the school's E Safety Policy.

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them, our Tooled Up membership and during parent information evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Concerns captured by our software monitoring system of Surface devices are reported to the school. During term time these captures are reviewed daily (Monday to Friday) by the pastoral team. On non-school days i.e. weekends and school holidays, monitoring continues but will not be reviewed until the next school day.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about the Senior School's policies in these areas, please refer to our E-Safety policy.

## **10.1 Artificial intelligence (AI)**

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

Colfe's recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Colfe's will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.

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

Please see our Artificial Intelligence policy for more information.

## **11. Notifying parents or carers**

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

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

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges

Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

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

In the Senior School, the Learning Support Team, Director of Pastoral Care, Heads of Houses, School Counsellor and external agencies and partners or educational psychologists.

In the Junior School, the Learning Support Team/Director of Learning Support, sometimes working with pastoral staff, Deputy Head. Will work with Gill Fisher for appropriate wording.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

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

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

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

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

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Jo Sansome, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

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

The section of KCSIE 2025 on gender questioning children remains under review, pending the publication of revised guidance. This aspect of the policy is therefore subject to change.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

We have a specific support group for children who are members of the LGBTQ+ community and they share information with the DSL and the EDI lead so that any concerns or patterns can be identified and responded to

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

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

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

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

## **16. Visitors to the School**

### **16.1 Arrangements for planned visitors**

Please complete the visiting speakers form for any visitors who will be working with children during their visit (for example, a visiting speaker delivering a PSHE talk or leading a Year 12 forum, a mentor, coach or visiting teacher). This can be found on the Pastoral Signposting page on Sharepoint: [Risk Assessment Visiting Speakers / External Staff / Outside Agencies Form](#). The form outlines the additional measures you should take when the visitor is in school, including accompanying them at all times, and sending them our safeguarding policy in advance.

When someone visits our school, we request and check their identification, log their name, organisation, who they are visiting and time of arrival and departure.

We give visitors a badge or pass that clearly identifies them as a visitor. This should be visible at all times. Visitors without an identification badge should be politely challenged by school staff.

### **Arrangements for unplanned visitors**

Reception staff should be aware of any visitors you are expecting. Visitors should always make an appointment if possible.

The reception staff have been trained to know what to do when an unplanned visitor arrives.

### **Safeguarding arrangements**

Each visitor is given information about how they should report any safeguarding and child protection concerns. This should include:

- who the nominated child protection lead is and how to contact them
- information about [whistleblowing](#)

If a visitor reports a concern, the DSL will work with them to make the appropriate referrals to children's social care.

Visitors who represent organisations and are self-employed should have their own safeguarding and child protection policy and procedures. You can ask to see these in advance to ensure they meet your schools standards.

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

### **17.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **17.2 Other complaints**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Please see the Staff Complaints Policy and Complaints Policy for more information.

In response to a written complaint relating to how the school is fulfilling the EYFS requirements, the school will:

- Notify the person who made the complaint of the outcome of the investigation within 28 days of having received the complaint.
- Make a record of complaints available to Ofsted, or the CMA with which a provider of CoDP is registered, on request.

### **17.3 Whistleblowing**

Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available. Staff can call 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH. Staff can also contact Ofsted on 0300 123 4666 (Monday to Friday from 8am to 6pm or via email on [Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

Ofsted can be contacted on 0300 123 1231 or by email: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)  
Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

ISI can be contacted on 020 7600 0100 or by email: [info@isi.net](mailto:info@isi.net)  
ISI, CAP House, 9-12 Long Lane, London EC1A 9HA

Please see Colfe's Whistleblowing Policy for more information

## **18. Record-keeping**

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

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

**5 days** for an in-year transfer, or within

**The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

All safeguarding records are saved electronically and securely on CPOMS.

In addition:

Our Recruitment, Selection and Disclosures (Safer Recruitment) Policy and Procedures and our Recruitment Privacy Notice set out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.

Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **19. Training**

### **19.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

Have regard to the Teachers' Standards to support the expectation that all teachers:

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

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

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

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

Volunteers will receive appropriate training, if applicable.

All new staff will be provided with induction training that includes:

- the child protection policy;

- the role and identity of the DSL(s) and any DDSL;
- the behaviour policy;
- the staff code of conduct including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who go missing or absent from education;
- a copy of Part one of *KCSIE*; and
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and Annex C the role of the DSL and Part five, *Child on Child Abuse of KCSIE*). Is this consistent with what is said above and our practice?)
- E-Safety policy

All staff are also required to:

- Read Part one of *KCSIE and Annex B* and confirm that they have done so. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email.
- We also ask staff to read Annex C, the role of the DSL and Part 5 Child on Child Abuse.
- Understand key information contained in Part one of *KCSIE and Annex B*. The School will ensure staff understanding by insisting that they attend training and answer a survey after training, also to sign to confirm attendance.
- Receive training in safeguarding and child protection regularly (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 141 *KCSIE* for further information), in line with advice from the LSCP, namely Greenwich. Training will include child on child abuse and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via, for example, staff meetings, briefings and emails .

## 19.2 The DSL and deputy DSLs

The DSL and deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs as part of the Greenwich DSL Partnership Network, and taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

In accordance with *Keeping Children Safe in Education 2025* the DSL should liaise with the headteacher or principal to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an 'appropriate adult'.

Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

## 19.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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

#### **19.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See our Recruitment Selection and Disclosures (Safer Recruitment) Policy and Procedures Policy for more information.

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

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

### **20. Monitoring arrangements**

This policy will be reviewed **annually** by the Director of Pastoral Care. At every review, it will be approved by the full governing board.

The Headmaster is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The DSL will present an annual report to governors, citing data so that they can monitor the effectiveness of our safeguarding procedures and practices. The school draws on the expertise of staff, including the DSLs, in shaping the school's safeguarding arrangements and policies.

### **21. Links with other policies**

This policy links to the following policies and procedures:

Anti-Racism Policy

Attendance Policy and Procedures

Child on Child Policy

Complaints policy

Data Protection Policy

E-Safety Policy

Equity Diversity and Inclusion Policy

Harmful and Abusive Behaviours (Anti-Bullying) Policy

Low Level Concerns Policy

RSHE Policy and Statement

## Appendix I: Types of abuse

### Abuse and neglect

4. Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may need help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

5. If staff are unsure, they should always speak to the designated safeguarding lead (or a deputy).

### Forms of abuse and neglect

6. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

7. **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

8. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

9. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

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

11. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

### **Safeguarding issues**

12. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images, including computer generated images, ('pseudo-images') and/or videos<sup>145</sup> (also known as youth produced sexual imagery) put children in danger.

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

13. All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

14. All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

## **Appendix 2: specific safeguarding issues**

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, homelessness, modern slavery and cybercrime.

### **Assessing adult-involved nude and semi-nude sharing incidents**

This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### **Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

Contacted by an online account that they do not know but appears to be another child or young person

Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images

Moved from a public to a private/E2EE platform

Coerced/pressured into doing sexual things, including creating nudes and semi-nudes

Offered something of value such as money or gaming credits

Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### **Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

Use images that have been stolen from the child or young person taken through hacking their account

Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person

Quickly engaged in sexually explicit communications which may include the offender sharing an image first

Moved from a public to a private/E2EE platform

Pressured into taking nudes or semi-nudes

Told they have been hacked and they have access to their images, personal information and contacts

Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

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

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

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

- Are at risk of harm or neglect

- Are at risk of forced marriage or FGM

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

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

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

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

## **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for

something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

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

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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 9 sets out more detail about our school's approach to this type of abuse. Please also see our child-on-child abuse policy.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

## **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

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

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

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

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

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

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

### **FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

A pupil confiding in a professional that FGM has taken place

A mother/family member disclosing that FGM has been carried out

A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating

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

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

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

Speak to the pupil about the concerns in a secure and private place

Activate the local safeguarding procedures and refer the case to the local authority's designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

Refusal to engage with, or becoming abusive to, peers who are different from themselves

Becoming susceptible to conspiracy theories and feelings of persecution

Changes in friendship groups and appearance

Rejecting activities they used to enjoy

Converting to a new religion

Isolating themselves from family and friends

Talking as if from a scripted speech

An unwillingness or inability to discuss their views

A sudden disrespectful attitude towards others

Increased levels of anger

Increased secretiveness, especially around internet use

Expressions of sympathy for extremist ideologies and groups, or justification of their actions

Accessing extremist material online, including on social media

Possessing extremist literature

Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

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

Sexual violence and sexual harassment can occur:

Between 2 children of any age and sex

Through a group of children sexually assaulting or sexually harassing a single child or group of children

Online and face to face (both physically and verbally)

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

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

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

When supporting victims, staff will:

Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

Regularly review decisions and actions, and update policies with lessons learnt

Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

Challenging inappropriate behaviours

Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Serious violence**

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

Increased absence from school

Change in friendships or relationships with older individuals or groups

Significant decline in performance

Signs of self-harm or a significant change in wellbeing

Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

Being male

Having been frequently absent or permanently excluded from school

Having experienced child maltreatment

Having been involved in offending, such as theft or robbery

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

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

All visitors will be required to verify their identity to the satisfaction of staff.

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

Visitors are expected to sign in at school reception and wear a visitor's badge.

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

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

## **Non-collection of children**

Please see our Child Missing Education Policy for procedures related to the non-collection of children.

## **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Please see our Child Missing Education Policy for procedures related to missing pupils.

### **Appendix 3: Procedures for dealing with allegations against a staff member, supply teacher, volunteer or contractor**

The following steps should be followed if you have a concern that anyone working in the school has:

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

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

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

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

#### **Head**

**Daniel Gabriele**

TEL: 020 8463 8102

EMAIL: [head@colfes.com](mailto:head@colfes.com)

#### **Governors**

**Chairman of Governors**

**(via Clerk to the Governors)**

Matthew Pellereau

TEL: 020 8463 8112

EMAIL: [mpellereau@colfes.com](mailto:mpellereau@colfes.com)

#### **Local Authority Designated Officer**

**Greenwich**

Laura Lumbis

TEL; 020 8921 2247 or 3930

EMAIL: [Childrens-Lado@royalgreenwich.gov.uk](mailto:Childrens-Lado@royalgreenwich.gov.uk)

[Laura.Lumbis@royalgreenwich.gov.uk](mailto:Laura.Lumbis@royalgreenwich.gov.uk)

There are two aspects to consider when an allegation is made.

#### **1. Looking after the welfare of the child.**

The DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

#### **2. Investigating and supporting the person subject to the allegation.** The steps that are taken to investigate the allegation are outlined below.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and the Local Authority Designated Officer or, more commonly known LADO in Greenwich.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head OR to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors, Matthew Pellereau, via the Clerk to the Governors, 020 8463 8112. Where the Head OR DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and local authority LADO.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, following communication with both the individual and the parents. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by children's social care, the LADO or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future.

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE 2025 and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the school will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so. If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Where appropriate, the Senior School will inform ISI of the allegation and actions taken, within the necessary timescale.

The Junior School will inform Ofsted/ISI of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted/ISI as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The Junior School will notify Ofsted/ISI within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).