



Safeguarding Policy

This policy will be reviewed annually
Policy reviewed: September 2021 by JG/LTB
Next review: September 2022 by JG/SAM

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WCPS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.

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Introduction

1.1 Safeguarding and promoting the welfare of children is defined for statutory purposes as protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to achieve the best outcomes.

1.2 The core safeguarding principles of Wimbledon Common Prep School (WCPS) - hereafter ‘the school’ are: It is everyone's responsibility, including the school and all school staff to protect and promote the children’s welfare. Children who feel safe are happier, more emotionally secure and are more likely achieve their potential. Pupils, staff, parents and governors will be involved in the development and review of policy, processes and implementation The Governing Body will review this document annually unless events mean this must be reviewed more frequently.

1.3 This policy has been authorised by the Governing Body, is addressed to all staff and volunteers, is available on request and is published on the WCPS website. It is a whole-school policy and applies wherever staff, Governors or volunteers are working with pupils, even where this is away from the school, for example on an educational visit.

1.4 The policy has been developed having regard to the following guidance and advice:

[Keeping Children Safe in Education \(September 2021\) \(KCSIE\)](#)
[Working together to Safeguard Children \(2018 updated 2020\)](#)
[Prevent Duty Guidance for England and Wales 2021](#)
[Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism \(2019\)](#)
[Multi-agency statutory guidance on FGM \(2020\)](#)
[Children missing Education \(2016\)](#)
[What to do if you're worried a child is being abused: advice for practitioners \(2015\)](#)
[Information sharing: advice for practitioners providing safeguarding services \(2018\)](#)
[Sharing nudes and semi-nudes advice for education settings AND how to respond to an incident \(2020\)](#)
[Child sexual exploitation: Definition and a guide for practitioners \(2017\)](#)
[Charity Commission guidance: safeguarding and protecting people for charities and trustees \(2019\)](#)
[Sexual Violence and Sexual Harassment between children in schools and colleges \(Sept 2021\)](#)
[Inspecting safeguarding in the Early Years 2021](#)

1.5 It is consistent with the safeguarding procedures for Merton and the London local Safeguarding Children Partnerships.

1.6 It is also important that staff read this policy with reference to the more detailed guidance offered in the following policies:

- Acceptable Use Policy
- Behaviour
- Anti-Bullying
- Staff Code of Conduct
- Whistleblowing
- Recruitment, Selection and Disclosure
- Health and Safety
- Educational Visits
- Missing Pupil
- Computing policy
- Learning enrichment policy
- PSHE policy
- Visiting speaker polic

1.7 As well as the explanations in this policy, colleagues may refer to the Safeguarding Handbook. The handbook provides more detailed documentation on the school's efforts to promote British Values, educate and listen to the pupils in safeguarding matters, follow the directives of the Prevent Duty and foster a respectful and caring school environment.

2 Statement

Every pupil should feel safe and protected from any form of abuse and neglect. The school is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment and understand their safeguarding responsibilities. The school will ensure that we practice safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by another organisation) to work with children and young people. See also the school's Recruitment, Selection and Disclosure Policy; follow the local inter-agency procedures of the Merton Safeguarding Children Partnership (MSCP); be alert to signs of abuse and neglect both in the school and from outside (including online) and to protect each pupil from any form of abuse and neglect, whether from an adult or another pupil deal appropriately with every suspicion or complaint

of abuse and neglect and to support children who have been abused in accordance with his/her agreed safeguarding plan; design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations; be alert to the needs of children with physical and mental health conditions; operate robust and sensible health and safety procedures. assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area; identify children who may be vulnerable to radicalisation, and know what to do when they are identified; take all practicable steps to ensure that school premises are as secure as circumstances permit; consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the school or in the local area; and have regard to regulations and standards issued by the Secretary of State for Education in accordance with Section 94 of the Education and Skills Act 2008 and sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and associated regulations.

3 Principles

3.1 The child's welfare is paramount. All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected and feel confident, and know how to approach adults if they are in difficulties.

All staff are responsible for safeguarding and the promotion of the children's welfare as part of their professional duties.

All staff have an equal responsibility to act in accordance with this policy and procedures and KCSIE.

All staff have to be alert to situations: (i) where a child might benefit from early help; or (ii) which give rise to concerns about a child; or (iii) which indicate a child is in danger or at risk of harm and operate with the best interests of the child at heart.

3.2 Part 1 of KCSIE and Annex B is provided to colleagues each school year and at the start of their employment with the school and staff will be required to confirm that they have read and understand this. As all staff have direct contact with children reading the condensed version in Annex A is not sufficient.

3.3 The school is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the school's recruitment, selection and disclosure policy. Where staff from another organisation are working with pupils on another site, the school will have received confirmation that appropriate safeguarding checks have been carried out on those staff.

3.4 All staff and pupils involved in safeguarding issues will receive sustained and appropriate support from relevant members of the senior management team, who will follow this policy's guidance and statutory guidance in doing so.

3.5 The school will work with other agencies to assess, identify, and support those children who could benefit from early help, are suffering harm or who may suffer harm without intervention. Such agencies may include the Police, Children's Social Care (CSC) and health services. Where requested, WCPS will allow access for children's social care from the local authority, and will supply information, as needed, to the local safeguarding partnerships .

4 Aims

To ensure good practice throughout the school; to illustrate the school's commitment to safeguarding children and to sustain an environment where staff feel able to raise concerns; and to provide all staff, volunteers and governors with the required information needed to fulfil their statutory responsibilities for safeguarding.

5 Key staff

5.1 WCPS (WCPS)

- The DSL is **Mrs. Jo Gannon** (DSL) JG@wcps.org.uk
- The deputy DSL is **Mrs Sarah Melsom** (deputy head pastoral) SAS@wcps.org.uk

5.2 The Safeguarding governor for the school is Mrs. Sally Hobbs, who can be contacted via the secretary to the governors, Anna Maria Clarke AM.Clarke@kcs.org.uk.

5.3 The chair of governors is Lord Deighton, who can be contacted via the secretary to the governors, Anna Maria Clarke AM.Clarke@kcs.org.uk

5.4 The vice chair of governors is Mr. Glen James, who can be contacted via the secretary to the governors, Anna Maria Clarke AM.Clarke@kcs.org.uk

6 Roles and responsibilities

6.1 Role of the Governing Body:

- Designate a governor to take leadership responsibility for the School's safeguarding arrangements. It is the responsibility of the full governing body to have strategic responsibility for the school's safeguarding arrangements and review annually the safeguarding policy and effective implementation of its procedures.
- Appoint a Designated Safeguarding Lead (DSL). The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for safeguarding.
- Recognise the importance of the role of the DSL and deputies and support them; the DSL is the person most likely to have the complete safeguarding picture; ensure the training necessary to be effective is undertaken.
- Ensure that there are safe and effective recruitment policies and disciplinary procedures in place.
- Recognise the contribution the school can make to helping children keep safe through the teaching and encouragement of responsible attitudes to adult life through PSHE and other curriculum and co-curricular areas.
- Ensure that appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate material online.
- Ensure that the school's safeguarding arrangements take into account the procedures and practice of the MSCP, including understanding and reflecting local protocols for assessment and the referral threshold document.

- Ensure that the governing body has an effective link with the multi-agency safeguarding hub. This may be achieved through speaking on the phone to the LADO and establishing contact.
- Ensure that the School contributes to inter-agency working, including providing a coordinated offer of early help when additional needs of children are identified and support to children subject to safeguarding plans.
- Ensure that the school's policy and procedures reflect the additional barriers that can exist when recognizing abuse and neglect in children with SEND.
- Ensure that information is shared, as appropriate, with external agencies.
- Ensure that serious incidents which fall within the serious incident reporting thresholds are reported to the Charity Commission.
- Ensure that the school has effective policies in place for handling complaints and allegations.
- Ensure, in conjunction with the DSL, that an appropriate member of staff with the necessary skills, knowledge and understanding is appointed, if appropriate, to look after the needs of a 'looked after' pupil.

6.2 Role of the Governor with special responsibility for safeguarding

The Governor with special responsibility for safeguarding should:

- have oversight of safeguarding matters;
- liaise with the local authority and/or partner agencies, as appropriate;
- instigate the full governing body's annual review of this policy by using the WCPS audit.

6.3 Annual safeguarding audit by Governing Body

Key matters although not exclusive, to be checked by the annual audit of safeguarding carried out by the full governing body are:

- statutorily compliant procedures are in place for dealing with allegations of abuse made against members of staff;
- that procedures are in place to handle allegations against other children;
- that safer recruitment policies, training and procedures are in place with regard to "Teacher's Standards" which set out that all teachers manage behaviour effectively to ensure a good and safe educational environment that requires teachers to have a clear understanding of the needs of all pupils.
- that training in child protection is undertaken in accordance with the Merton expectations;
- that the DSL and deputy DSL receive refresher training every two years and that regular safeguarding and child protection updates are received at least annually;
- Identifying issues and themes which may have emerged in the School and how these have been handled;
- the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.

6.4 Duty of staff, governors and volunteers:

All staff, Governors and volunteers of the school are under a general legal duty to:

- protect children from abuse and neglect, promote the welfare of children and prevent concerns from escalating.
- be aware of the terms and procedures in this policy and to follow them;
- have read and understand Part 1 of KCSIE and Annex B.
- attend appropriate safeguarding training (see section 10 below);
- abide by the guidance outlined in the Staff Code of Conduct and other related policies referenced in this policy and the appendices in particular the behavior policy and the missing pupil policy. The code of conduct gives clear guidance about behaviour so as to avoid placing pupils or staff at risk of harm, or at risk of allegations of harm;
- be aware of the signs of abuse and neglect so that they are able to identify potential issues (see Appendix 1 for further details); to keep a sufficient record of any concerns, discussions and decisions in accordance with this policy; and report any matters of concern in accordance with this policy.

6.5 Designated Safeguarding Lead (DSL)

The DSL is appointed from the school's senior leadership team. The DSL is the main point of contact for any safeguarding concerns as they are likely to have the complete picture and has lead responsibility for safeguarding including online safety. The deputy DSL can deal with safeguarding matters in the DSL's absence, but the ultimate lead responsibility remains with the DSL. The broad areas of responsibility for the DSL are as follows, as stipulated in KCSIE:

6.5.1 Managing referrals:

The DSL is expected to refer cases of suspected abuse to the local authority Children's Social Care as required; to support staff who make referrals to the local authority Children's Social Care; to refer cases to the Channel programme where there is a radicalisation concern as required; to support staff who make referrals to the Channel programme; to refer cases where a person is dismissed or left employment due to risk/harm to a child to the Disclosure and Barring Service as required; and to refer cases where a crime may have been committed to the Police as required.

6.5.2 Work with others:

Liaise with the head teacher to inform them of safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. As required, liaise with the Case Manager (see Appendix 4 of this policy) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member). Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

6.5.3 Training requirements:

The DSLs and Deputy DSL will receive training to provide them with the knowledge and skills required to carry out the role. This training, which includes Prevent awareness training, will be carried out every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they understand the assessment process for providing early help and

intervention, for example through locally agreed common and shared assessment processes such as early help assessments; have a working knowledge of locally agreed procedures for safeguarding and inter-agency working, in particular how local authorities conduct a safeguarding case conference and a safeguarding review conference and be able to attend and contribute to these effectively when required to do so; ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures and the Staff Code of Conduct, especially new and part time staff; are alert to and support the specific needs of children in need, those with special educational needs and young carers; are able to keep detailed, accurate and secure written records of concerns and referrals; understand and support the School with regard to the requirements of the Prevent duty. They are able to provide advice and support to staff on protecting children from the risk of radicalisation and through the staff guidance on peer on peer abuse and "Sexual Violence and Sexual Harassment Between Children in Schools and Colleges" have an understanding of harmful sexual behaviours. Obtain access to resources and attend any relevant or refresher training courses; and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

6.5.3 Raising awareness:

The DSL should ensure the school's safeguarding policies are known, understood and used appropriately; Ensure this policy is reviewed annually (as a minimum) and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with the Governing Body regarding this; Ensure this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made, recognising the role of the school in this process; and link with the local children's safeguarding partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding. The DSL will also draw on the expertise of staff to shape the safeguarding policy and practice, through INSET training and staff meetings.

The DSL should be supported in developing the knowledge and skills to encourage a culture of listening and reducing barrier to disclosure.

6.5.4 Child protection file

The DSL is responsible for ensuring that child protection files are kept up to date and securely stored. Information is only accessed by those who need to see it and where the file or content in it is shared, this happens in line with information sharing advice set out in KCSIE. Concerns and referrals are kept in a separate child protection file for each child.

Records include a clear and comprehensive summary of any concern, details of how the concern was followed up and resolved and notes of any actions taken, decisions reached and any outcome.

Where children leave the school, ensure their safeguarding file is copied for any new school as soon as possible or within 5 days of the start of a new term. and within 5 days for an in-year transfer but transferred separately from the main pupil file, ensuring secure transit and that confirmation of receipt is obtained.

In addition to the child protection file, the DSL will share any additional information with the new school or college in advance of the child leaving to help put in the right support to safeguard the child and help them thrive in their next school.

6.5.5 Prevent Duty

In accordance with the Prevent Duty Guidance for England and Wales (March 2015) and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the Designated Safeguarding Lead has, in addition, the following responsibilities: Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty; Co-ordinating Prevent duty procedures in the School;

Liaising with local Prevent coordinator's, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated; Undergoing WRAP or other appropriate training; Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training; and Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty. Please also see the DSL's full job description.

6.6 Deputy DSL:

If the DSL is unavailable, the activities of the DSL will be carried out the by the Deputy DSL. The Deputy DSL has also undertaken training to provide her with the knowledge and skills required to carry out the role (see 6.5.2 above). In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

Both the DSL and Deputy DSL may be contacted on their mobile telephone in relation to any safeguarding concerns out of School hours.

7 Safer recruitment

The school is committed to safer recruitment and the school's HR department is responsible for implementing these practices. As part of the safer recruitment process, as least one of the persons conducting the interview will have completed the safer recruitment training. See the recruitment, selection and disclosure policy for details.

8 Guidelines for good practice

8.1 To meet the responsibilities towards children, all staff are expected to read and understand the following policies and guidance:

- Safeguarding,
- Behaviour,
- Staff Code Of Conduct,
- Anti-Bullying,
- Acceptable Use and
- First Aid,
- Guidance for staff on peer on peer abuse

8.1.2 treat all children with respect;

8.1.3 set a good example by conducting ourselves appropriately;

- 8.1.4 involve children in decision-making which affects them;
- 8.1.5 encourage positive and safe behaviour among children be alert to changes in children's behaviour and maintain an attitude of 'it could happen here' where safeguarding is concerned;
- 8.1.6 recognise that challenging behaviour may be an indicator of abuse;
- 8.1.7 encourage and maintain appropriate standards of conversation and interaction with and between children, avoiding and discouraging the use of inappropriate sexualised or derogatory language;
- 8.1.8 be aware of the risks of peer-on-peer abuse;
- 8.1.9 be aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse;
- 8.1.10 be a good listener;
- 8.1.11 and ask the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE, or administering first aid.

Staff have regular reviews of their own practice and opportunities to discuss concerns, including the personal and professional duty to report welfare and safeguarding concerns to the DSL or in the absence of action, directly to MASH.

9 Vulnerable children

9.1 Some children may be at increased risk of significant harm as a result of neglect and/or physical, sexual or emotional abuse. (See Appendix 1 for details about the types and signs of abuse.) Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

9.2 The School also recognises that children may not be at risk of significant harm but are in need of additional support for one or more agencies.

9.3 To ensure that all of our children receive equal protection, we will give special consideration and attention to any child who is:

- showing signs of abuse/neglect;
- disabled or have special educational needs or certain health conditions
- living in an identified domestic abuse situation;
- a young carer showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by a parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- an asylum seeker;

- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living a transient lifestyle;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- does not have English as a first language;
- is a 'looked after' child (LAC) or a child in care or who has returned home to his/her family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care;
- is a child who needs a social worker
- is a child who requires mental health support.

9.4 Special consideration and attention includes monitoring through the pastoral systems of the school. At WCPS this is achieved through:

- the class teacher and Head of Year structure secure notes kept in child's file cause for concern items in staff meetings;
- awareness that children with SEND or physical health issues may be more prone to peer group isolation or bullying than other children and may be impacted more by these behaviours. Understanding that assumptions relating to indicators of possible abuse such as behaviour, mood and injury relate to child's condition rather than investigate thoroughly. Acknowledge that some children may have communication barriers and difficulties in reporting concerns.
- instances of bullying file or peer on peer abuse records.
- School counsellors may also be involved to support a child where this is deemed to be appropriate and the DSL liaises with CSC regarding involvement of outside support agencies.

9.5 Special consideration will also extend to the provision of safeguarding information, resources and support services in community languages and accessible formats. It may also include, as necessary, the appointment of an appropriately trained and informed teacher to promote the educational achievement of any child who is 'looked after' or who is otherwise considered in need of such support. Where a member of staff is placed in a position of working with a 'looked after' child, they will be provided with all necessary information, including: the child's status, up-to-date assessment information from the relevant Local Authority, the most recent care plan, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

9.6 Any concerns should be reported in accordance with the procedures set out in section 19 below.

Consideration of the appropriate action to take will be in accordance with the MSCP threshold document. The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

10 Training

10.1 All training will be carried out in accordance with MSCP procedures.

10.2 New staff, including temporary staff and volunteers as well as governors, will receive induction training on appointment, overseen by the DSL that includes:

- the contents of this policy
- the guidance in the Prevent Duty Guidance for England and Wales (March 2015)
- the Staff Code of Conduct, including acceptable use policies which includes pupil online safety, social media policy, behaviour policy, missing pupil policy which includes children missing in education and the Reporting Wrong Doing at Work Policy, identification and role of the DSL and deputy DSL, Part 1 and Annex B of KCSIE.
- online safety

10.3 All staff will receive a copy of this policy, the policies referred to in 10.2 above as updated annually and Part 1 and Annex B of KCSIE, and will be required to confirm that they have read and understand these.

10.4 All staff will undergo safeguarding training, which will include training as advised in the Prevent Duty 2015, as required by the MSCP, every 3 years. In addition, all staff members will receive safeguarding updates via e-mail and staff meetings on a regular basis and at least annually and regular online safety training. This training is integrated as part of the whole school safeguarding approach including wider staff training and curriculum planning.

10.5 The School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health. The DSL and deputy DSL will update their training, included a more thorough level of Prevent Duty training, every 2 years at level 3 standard. Their knowledge and skills will also be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role including training and refresher training on harmful sexual behaviours in children. In addition, senior staff will receive safer recruitment training. A record of all training will be kept by the head of HR.

10.6 The Safeguarding Governor, Chair of Governors and Vice Chair of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

10.7 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including staff meetings and professional development reviews.

10.8 Pupils will be made aware of safeguarding, including topics referred to in the Prevent Duty 2015, through the curriculum and PSHE lessons including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, and providing information about who they should turn to for help. A one size fits all approach may not be appropriate for all children and a more personalized or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

11 School premises

11.1 The school will take all practicable steps to ensure that school premises are as secure as circumstances permit. Visitors are to report to the main school entrance where they are to sign in. They will be given a visitor badge which they are to wear throughout their visit and will be asked to await collection or given further instruction.

11.2 No visitor is to move around the school building during term-time without an escort.

11.3 During school events, such as sports fixtures, parent's evenings and open days, visitors will not sign in but be guided to the appropriate areas and not allowed unsupervised access to buildings.

11.4 If a visitor wishes to see a pupil, then the visitor should be directed to reception and the appropriate senior teacher called.

11.5 Members of staff are asked to inform reception of expected visitors in advance.

11.6 Visitors without badges on the school site or badged and unaccompanied in a building should be politely challenged by members of staff.

11.7 See also the School's policy on Visiting Speakers at the end of this policy.

11.8 When facilities are used by other organizations e.g. sports clubs then assurances are sought from the organization that appropriate safeguarding, child protection policies and procedures are in place, including inspecting these as needed. At WCPS, once appropriate checks have been completed by HR coaches/instructors receive and sign to say they have understood the safeguarding policy, they are introduced to DSL and follow up spot checks are undertaken.

11.9 When outside contractors are present within the school they should be accompanied by a member of the KCS maintenance staff and not be left alone to work near to where children are. Should work be required to sensitive areas such as toilets or nearby areas, this work must be carried out outside of the school day when children are not present. Outside contractors sign in on entering the building and are given identification and a safeguarding summary card by the office staff.

12 Photography and Images

12.1 As set out in the School's terms and conditions, the school will include some photographs or images of pupils in the school's promotional material. We shall not disclose details such as the home address or the child's full name.

12.2 To ensure the safety and welfare of the boys in our care, our *Use of Children's Photographs, Video footage and Mobile phones in School Policy* outlines the protocols for the use of any film and electronic photographic equipment at Wimbledon Common Prep School and mobile phones used by parents and staff. The *Use of Children's Photographs, Video footage and Mobile phones in School Policy* is available on the school website and from the school office on request. All staff are to ensure that their mobile phones are left inside a bag or out of sight during the school day. Mobile phones should be set to silent, if any staff member has an emergency that requires them to keep their mobile close to hand, they should obtain permission from their head of year. When on outings only the school mobile should be used, this telephone does not have a camera function.

Parents should not use their mobile phone when on the school premises; this includes the playground and AstroTurf. Photographs of their own son may be taken; using a mobile phone providing a member of staff is present.

12.3 Parents who accompany staff on trips should not make or receive calls or use the camera and internet functions on their mobile phone during the trip. All parent volunteers will be given the number of the school mobile so that they can be contacted through the trip leader in an emergency.

12.4 Parents should not record video footage of their child when in the school building and grounds, performing in the school production or at a sports fixture/sports day. Photographs of their son may be taken on these occasions under the supervision of staff. All school productions will be filmed professionally and a DVD available to purchase.

12.5 Only school owned equipment (E.g. work provided digital video cameras and I pads will be used by staff to capture images of children. Use of personal cameras (including the camera function on a mobile phone) by staff is prohibited at all times.

12.6 Photographs will be disposed of should they no longer be required; hard copies may be returned to the parent or carer, deleted or shredded as appropriate. Photography is not permitted in sensitive areas of the schools, such as toilets and when the children are dressing undressing. Our policy further clarifies exactly how we will and will not use photographs and video of the boys and details the restrictions on using personal mobile phones or other such devices on the school premises by staff and parents.

13 Cyber Safety

13.1 Mobile devices and computers are a source of education, communication and entertainment. However, we know that some adults and young people may use these technologies to harm children. The harm might range from sending hurtful or abusive texts, messages and emails, to enticing children to engage in sexually harmful conversations online, webcam filming, photography or face-to-face meetings. These technologies may also be used by those who wish to radicalise vulnerable children for their violent purposes.

13.2 The safe use of technology is a focus in all areas of the curriculum and pupils receive guidance on cyber safety through our PSHE programme with reference to DfE advice "Teaching online safety in schools" and Education for a connected world. The School has appropriate filters and monitoring systems in place and is mindful that this should not lead to unnecessary restrictions on learning. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Please refer to WCPS *Acceptable Use Policy* and the *Anti-Bullying Policy* for further information. Both of these policies as well as the *Safeguarding Policy* reflect the non-statutory guidance offered in *The Use of Social Media for Online Radicalisation* (July 2015).

13.3 In the event that the school requires pupils to undertake a period of remote learning the school follows the separate guidance provided to parents and staff about the school's online learning platform.

14 Missing Child and Children Missing from Education Procedures

14.1 A child who goes missing from an education setting is a potential indicator of abuse or neglect. All staff should be aware of the school's procedures which are used for searching for and reporting

any pupil missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil/pupil's parent for being missing.

Please see the school's separate *Missing Pupil Policy* for further details.

14.2 The school shall inform the applicable local authority (within which the pupil resides when not at the school) of any pupil who is going to be deleted from the admission register where he /she:

- has been taken out of school by his /her parents and are being educated outside the school system e.g. home education;
- has ceased to attend the school and no longer live within reasonable distance of the school;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend School before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- is in custody for a period of more than four months due to a final court order and the school does not reasonably believe he/she will be returning at the end of that period;
- has been permanently excluded; or
- has been withdrawn from the school and we are unable to confirm the name of his / her new school.

14.3 The applicable local authority (i.e Merton and the pupil's resident local authority if different) must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to: fulfil its duty to identify children of compulsory school age who are missing from education; and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

14.4 The school shall inform the applicable local authority (i.e Merton and the pupil's resident local authority if different) of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

14.5 Elective Home Education (EHE)

It is expected that a parents' decision to home educate would be made with the child's best education at the heart of the decision, but this is not always the case. Home educations can mean that some children are less visible to the services that are there to keep them safe and supported in line with their needs. The school informs Merton LA of all deletions from their admissions register when a child is taken off roll. It is good practice, when a parent has expressed their intention to remove a child from school with a view to educating at home for the school to work with other key professionals to coordinate a meeting with parents to ensure that this is in the best interest of the child. This is particularly important where a child has SEND, is vulnerable and/or has a social worker.

15 Action to prevent radicalisation

15.1 WCPS recognises its responsibility to protect children and young people from being radicalised, influenced by extremist views or drawn into terrorism. All teachers will present their views or the views of another in a balanced and non-partisan way. Teachers will also challenge, as a matter of course, any extremist opinions or discriminatory views. Pupils' resilience against radicalisation or extremism is developed through the close pastoral relationships between staff, pupils and their

families, but more specifically through the school's active promotion of British Values, as appropriate in lessons, and through the PSHE schemes of work that include lessons on the signs and dangers of extremism, as well as guidance on what to do if pupils are concerned for themselves or a friend. Staff are trained, as part of the safeguarding training, to recognise and know how to respond to a concern. If a member of staff is anxious about extremist views or attitudes being shown by a pupil, (or parent) or is concerned by any other aspect of their behaviour they should report the matter to the DSL, as they would any other safeguarding concern. The DSL will consult with senior colleagues and assess the level of risk. Further action might include the DSL's liaison and referral to the appropriate government agencies and local authorities (or police) as described in the government's Prevent Duty Guidance for England and Wales (March 2015). If a member of staff has an allegation about the behaviour and attitude of a colleague or visiting speaker, they should speak immediately to the Head teacher, who will liaise with the DSL.

16 Listening to pupils

16.1 WCPS is an open and caring community, one in which colleagues, pupils and parents can raise and share views on school life. Appendix 5 'Listening to the pupil voice' details all the ways in which we aim to listen to the pupil voice for matters of safeguarding, behaviour, wellbeing and school improvement.

17 Complaints about staff

17.1 All staff are required to report any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm in accordance with this policy. See the procedures set out in Appendix 4.

17.2 Staff and volunteers should also feel able to follow the School's separate procedures to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly safeguard the welfare of pupils, and that such concerns will be taken seriously. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. For further details of the procedures, please see the school's *Reporting a Wrong Doing at Work Policy*. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (the relevant contact details can be found in this policy).

17.3 The *Complaints Policy* will be followed if a parent raises a concern about poor practice or a wrongdoing by a member of staff that does not involve the safeguarding of children.

18 Recognizing abuse and potential harm

18.1 Full details on the types and signs of abuse are found in Appendix 1.

19 Procedures - what to do if you have a concern

19.1 Every complaint or suspicion of abuse or neglect from within or outside the School will be taken seriously and in accordance with this policy. Staff should always be vigilant and if ever unsure, they must always raise concern with the DSL or deputy.

19.2 A member of staff suspecting or hearing a complaint of abuse or neglect must:

- listen carefully to the child and keep an open mind.
- have the attitude that 'it could happen here' and should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer;
- reassure the child but not give a guarantee of absolute confidentiality.
- explain that they need to pass on the information in accordance with this policy to ensure that the correct action is taken;
- keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. Colleagues ought to use the Disclosure Form in Appendix 2 of this document.
- Safeguarding incidents or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

19.3 Preserving evidence: All other evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be kept securely with the Disclosure Form and passed on in accordance with the procedures set out below.

19.4 Early Help:

19.4.1 The School understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life.

19.4.2 The School's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. See also section 9 above.

19.4.3 A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the MSCP referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

19.4.4 If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

19.4.5 Whilst all children may benefit from early help, all staff are required to be particularly alert to the following groups of more vulnerable children who may be at more risk of requiring early help:

- is disabled or has specific additional needs;
- has special educational needs (whether or not they have a statutory Educational Health and Care Plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child such as drug or alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is a privately fostered child.
- has certain health conditions.
- has a mental health need.
- at risk of honour-based abuse.
- has a parent in prison or is affected by parental offending.

19.5 Concerns about a pupil's welfare:

19.5.1 If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible regardless of whether a child is open to Children's Services or not and regardless of any level of involvement.

19.5.2 On being notified of a concern the DSL will consider the appropriate course of action in accordance with the MSCP referral threshold document. Such action may include early help or a referral to children's social care. Parental consent is not required for referrals to statutory agencies.

19.5.3 If it is decided that a referral is not required, the DSL will keep the matter under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

19.5.4 Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

19.5.5 In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's social care. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible

19.6 Actions if a child is in immediate danger or at risk of harm:

19.6.1 If a pupil is in immediate danger or is at risk of harm, a referral should be made to children's social care and / or the police immediately.

19.6.2 Anybody can make a referral in these circumstances. See section 19.7 below for details on making a referral.

19.6.3 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

19.7 Making a referral:

19.7.1 The relevant contact information is set out at the front of this policy. If the referral is made by telephone, this should be followed up in writing.

19.7.2 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact CSC.

19.7.3 If after a referral, the pupil's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves.

19.7.4 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

19.7.5 Referrals concerning issues highlighted in the Prevent Duty 2015, will be raised with the MASH team at Merton and advice will then be sought as to the next step. This may include liaison with the relevant Channel Panel or local police contact. [NPCC – when to call the police](#) provides guidance on when a DSL should consider calling the police and what to expect when they do.

19.8 Allegations against teachers, the head teacher, Governors, volunteers and other staff:

The school has procedures for dealing with allegations against teachers, the Head teacher, Governors, volunteers and other staff who work with children and contractors that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part 4 of KCSIE and are set out in Appendix 4.

19.9 Allegations against former staff and historical allegations:

Allegations against a teacher who is no longer teaching and historical allegations should be referred directly to the head teacher, who will inform the Police.

19.10 Code of conduct:

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is mainly held in the *Staff Code of Conduct*.

19.11 Allegations against pupils:

19.11.1 The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Examples of behaviour by a pupil which may raise safeguarding concerns may include: violence, including gender based violence; threatening or intimidating behaviour; misconduct of a sexual nature, including indecent exposure or touching or serious sexual assaults; encouraging others to engage in inappropriate sexual behaviour; any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil; bullying, including cyberbullying. See Appendix 1 section 1.2.9.

19.11.2 The School takes steps to minimize the risk of peer on peer abuse. The School has robust anti-bullying procedures in place (see the School's guidance on peer on peer abuse and Anti-Bullying Policy – peer on peer abuse) and pupils are taught at all stages of the School about respect for others, acceptable behaviour and how to keep themselves safe.

19.11.3 Allegations against pupils should be reported in accordance with the procedures set out in sections 19.4, 19.5 and 19.6 above.

19.11.4 A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, discipline and sanctions will apply. The DSL will take advice from the CSC and other external agencies during the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. 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 the CSC, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

19.11.5 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary. Informing parents: Parents will be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LADO, the CSC, the Police and/or the head teacher before discussing details with parents. There is no requirement to gain parental consent before a referral is made, if this is in the best interests of the child. In all cases, the Designated Safeguarding Lead will be guided by the MSCP referral threshold document.

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

20 Confidentiality and information sharing

20.1 The school will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The school will co-operate with the Police and CSC to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989.

20.2 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

20.3 In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

20.4 Data protection legislation does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Information sharing is vital in identifying and tackling all forms of abuse and neglect. School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children whether this is when problems are first emerging or where a child is already known to the local authority children's social care.

Staff should however be aware that data protection legislation requires that organisations and individuals must process personal data fairly and lawfully. Data must be kept secure in accordance with the school's *information security policy*. Information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

The *information sharing advice for practitioners 2018* supports staff who have to make decision about sharing information. This advice includes the seven golden rules for information sharing and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation. Staff who have concerns about sharing information about a pupil in a safeguarding context should contact the DSL for advice.

21 Monitoring and review

21.1 The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.

21.2 Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

21.3 The governors will undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Safeguarding Governor, preparing a written report commissioned by the full governing body. See section 6 for further information about the annual audit.

21.4 The full Governing Body will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. The governing body should also consider independent corroboration, such as inspection of records or feedback from external agencies including the LADO. Detailed minutes recording the review by the governing body will be made.

22 Contact numbers

The telephone numbers of Merton's Multi-Agency Safeguarding Hub, Kingston, Richmond and Fulham are below:

MERTON:

Merton Multi Agency Safeguarding Hub (MASH Team)

12th Floor, Merton Civic Centre, London Road, Morden, SM4 5DX

Tel: 020 8545 4226 or 020 8545 4227

Outside of normal working hours: 020 8770 5000

E-mail: mash@merton.gov.uk

Merton LADO (Local Authority Designated Officer) John Shelley

Email: lado@merton.gov.uk

Tel: 020 8545 3179

Merton general schools advice Tel: 020 8545 3922
ssq@merton.gov.uk
(School Standards and Quality)

Merton VCT (Vulnerable Children's Team) Tel: 020 8545 3922 vctmanager@merton.gov.uk

Merton Prevent police officer matt.tarrant@met.pnn.police.uk
Merton Safer Schools officer Dan.Hayward@met.police.uk
Tel: 020 8545 3922

KINGSTON UPON-THAMES

Single Point of Access (SPA) Team. (open 8am to 6pm Monday to Friday)

Telephone: 020 8547 5004

Out of hours: 020 8770 5000

Email: safeguarding@rbk.kingston.gov.uk

WANDSWORTH

Telephone: 020 8871 6622

Out of hours: 020 8871 6000. Email: mash@wandsworth.gov.uk

WESTMINSTER

Telephone: 020 7641 4000

Out of hours: 020 7641 6000

RICHMOND

Telephone: 020 8891 7969

Out of hours: 020 8744 2442

Email: spa@richmond.gov.uk

HAMMERSMITH AND FULHAM

Telephone: 020 8753 5392

Out of hours: 020 8748 8588

SURREY

Telephone: 0300 200 1006

Out of hours: 01483 517 898

OTHER

Admission and Attendance Registers: for schools admissions and alterations to the roll contact paul.stemp@merton.gov.uk. All SEN/EHCP notifications of on roll should be sent to SEN@MERTON.GOV.UK.

Local police non-emergency contact number 101

Non-emergency DfE advice: 020 7340 7264

counter-extremism@education.gsi.gov.uk

NSPCC National Society for the Prevention of Cruelty to Children (NSPCC)

Weston House

42 Curtain Road

London

EC2A 3NH

Tel: 0808 800 5000

Email: help@nspcc.org.uk

Appendix 1

Safeguarding – Types and signs of abuse and specific safeguarding issues

Wimbledon Common Prep School

1 Types of abuse

1.1 Abuse is 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 in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). A child might be abused by an adult or adults or another child or children.

1.2 Part 1 of KCSIE defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

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

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

1.2.3 Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Sexual abuse can take place online and can be used to facilitate offline abuse. The activities may involve physical contact and / or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

- 1.2.5 KCSIE acknowledges the following as specific safeguarding issues:
- 1.2.5.1 children missing from education (see section 14 above)
 - 1.2.5.2 children missing from home or care
 - 1.2.5.3 bullying including cyberbullying
 - 1.2.5.4 child sexual exploitation (see 1.2.6 below)
 - 1.2.5.5 domestic violence
 - 1.2.5.6 drugs
 - 1.2.5.7 fabricated or induced illness
 - 1.2.5.8 faith abuse
 - 1.2.5.9 female genital mutilation (see 1.2.7.1 below)
 - 1.2.5.10 forced marriage (see 1.2.7.2 below)
 - 1.2.5.11 gangs and youth violence
 - 1.2.5.12 gender-based violence / violence against women and girls (VAWG)
 - 1.2.5.13 hate
 - 1.2.5.14 mental health
 - 1.2.5.15 missing children and adult's strategy
 - 1.2.5.16 private fostering
 - 1.2.5.17 preventing radicalisation (see 1.2.8 below)
 - 1.2.5.18 relationship abuse
 - 1.2.5.19 sexting
 - 1.2.5.20 trafficking
 - 1.2.5.21 children who are involved in the court system and who may have to attend court to give evidence
 - 1.2.5.22 children with family members in prison
 - 1.2.5.23 child criminal exploitation including county lines and serious violent crime
 - 1.2.5.24 children whose families are or who are made homeless
 - 1.2.5.25 peer on peer abuse (see 1.2.9 below)
 - 1.2.5.26 sexual violence and sexual harassment (see 1.2.10 below)

1.2.6 Child sexual exploitation (CSE) and child criminal exploitation (CCE): Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases the abuse will be in exchange for something the victim needs or

wants and/or will be to the financial benefit or other advantage such as increased status of the perpetrator or facilitator or the abuse will be perpetrated through violence or the threat of violence.

CSE and CCE :

- can be perpetrated by individuals or groups, males or females, and children or adults.
- can be a one off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse
- can involve force and / or enticement – based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- victims can be exploited even when activity appears consensual and it should be noted exploitation can be facilitated and /or take place through the use of technology.

CCE can include children being forced to work in cannabis factories, forced to shoplift or pickpocket or to threaten other young people. Another form of exploitation is being coerced into moving drugs or money across the country (known as county lines), in which drugs networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Where staff suspect that a child may have been trafficked for the purposes of transporting drugs a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services who can offer support.

Some of the following behaviours in children can be indicators of CCE:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional well-being;
- misusing drugs and alcohol;
- going missing for periods of time or regularly come home late;
- regularly missing school or education or not taking part in education.

CSE can affect any young person under the age of 18 including 16 and 17 year olds who can legally consent to sex. It can include both contact and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g through others copying videos and images they have created and posted on social media.)

The indicators set out above for CCE can also be indicators of CSE along with:

- having an older boyfriend or girlfriend;
- suffering from sexually transmitted disease or becoming pregnant.

1.2.7 Radicalisation and the Prevent duty

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views in an age appropriate way. Being

drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children and staff can understand and discuss topics that examine similarities and differences between each other and begin to develop the knowledge and skills to be able to challenge extremist arguments.

The School has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Radicalisation: the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Terrorism: *an action that endangers or causes serious violence to a person/ people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.*

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

"There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances."

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The DfE's briefing note *The use of social media for on-line radicalisation (2015)* includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

1.2.8 Special educational needs and disabilities

The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and

premises are made accessible to everyone. See the School's Policy on Special Educational Needs and Disability Policy.

Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration. Pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

1.2.9 Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include, but is not limited to,

- Bullying (including cyberbullying, prejudiced based and discriminatory bullying)
- Sexual violence and sexual harassment including upskirting
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or other causing physical harm
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (previously referred to as sexting)
- Initiating/hazing type violence and rituals.
- Abuse in intimate personal relationships between peers.
- Causing someone to engage in sexual activity without consent.

See appendix 8

1.2.10 Sexual violence and harassment between children in schools:

This can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or harassing a single child or group of children. It can happen in any setting, outside of the setting as well as online.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Sexual violence in the context of this policy has the same meaning as those offences set out in the Sexual Offences Act 2003. Sexual harassment means unwanted conduct of sexual nature. Being a victim of sexual violence or harassment may adversely affect a child's educational attainment. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable

Staff should:

- Make clear that sexual violence and harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Take all reports seriously and not tolerate or appear to dismiss sexual violence or harassment as "banter" "part of growing up" "just having a laugh" or "boys being

boys”. This might include telling sexual stories, making comments, taunting or jokes of a sexual nature.

- Challenge behaviours (which are potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- be aware that some groups are more risk: girls, children with special educational needs and LGBT children.

If a child makes a report of sexual violence or sexual harassment, the matter is likely to be complex and require difficult decisions to be made, often quickly and under pressure. As with all safeguarding matters, it is important that the DSL is informed as soon as practicable.

When a child reports that they have been the subject of sexual harassment or violence, it is important that they are taken seriously and reassured that they will be supported and kept safe. They should not be given the impression that they are creating a problem by reporting the issue and should not be made to feel ashamed for making a report. It is important to recognise that how the school responds to concerns impacts on the confidence of others to report.

See also Appendix 7

1.2.11 Mental health

All staff should be aware that mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse neglect or exploitation.

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

Where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action, by following the reporting steps set out in this policy and speaking to the DSL.

1.2.12 Domestic Abuse

The Domestic Abuse Act 2021 introduced the cross – government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:

- Psychological

- Physical
- Sexual
- Financial and
- Emotional

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

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<https://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

<http://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>

The DSL is the person nominated by the school to take the lead in cases where domestic violence is affecting a pupil at the school. Operation Compass is also operated by police forces local to the school and will inform the DSL if a domestic abuse incident has taken place before the child arrives for school the following day.

2 Recognising Abuse

2.1 Physical Abuse

2.1.1 Physical signs to look out for:

- Injuries which the child cannot explain, or explains unconvincingly.
- Injuries which have not been treated or treated inadequately.
- Injuries on parts of the body where accidental injury is unlikely, such as the cheeks, chest or thighs.
- Bruising which reflects hand or finger marks.
- Cigarette burns, human bite marks.
- Broken bones.
- Scalds, especially those with upward splash marks where hot water has been deliberately thrown over the child, or 'tide marks' – rings on the child's arms, legs or body where the child has been made to sit or stand in very hot water.

2.1.2 Behavioural signs to look out for:

- A child who is reluctant to have his parents contacted.
- Aggressive behaviour or severe temper outbursts.
- A child who runs away or shows fear of going home.

- A child who flinches when approached or touched.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.
- Covering arms and legs even when hot.
- Depression or moods which are out of character with the child's general behaviour.
- Unnaturally compliant behaviour towards parents or carers.

2.2 Emotional Abuse

2.2.1 Physical signs to look out for:

- A failure to grow or to thrive (particularly if the child thrives when away from home).
- Sudden speech disorders.
- Delayed development, either physical or emotional.

2.2.2 Behavioural signs to look out for:

- Compulsive nervous behaviour such as hair twisting or rocking.
- An unwillingness or inability to play.
- An excessive fear of making mistakes.
- Self-harm or mutilation.
- Reluctance to have parents contacted.
- An excessive deference towards others, especially adults.
- An excessive lack of confidence.
- An excessive need for approval, attention and affection.
- An inability to cope with praise.

2.3 Sexual Abuse

2.3.1 Physical signs to look out for:

- Pain, itching, bruising or bleeding in the genital or anal areas.
- Any sexually transmitted disease.
- Recurrent genital discharge or urinary tract infections without apparent cause.
- Stomach pains or discomfort when the child is walking or sitting down.

2.3.2 Behavioural signs to look out for:

- Sudden or unexplained changes in behaviour.
- An apparent fear of someone.
- Running away from home.
- Nightmares or bed-wetting.
- Self-harm, self-mutilation or attempts at suicide.
- Abuse of drugs or other substances.
- Eating problems such as anorexia or bulimia.
- Sexualised behaviour or knowledge in young children.
- Sexual drawings or language.
- Possession of unexplained amounts of money.
- The child taking a parental role at home and functioning beyond their age level.

- The child not being allowed to have friends.
- Alluding to secrets which they cannot reveal.
- Telling other children or adults about the abuse.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.

2.4 Neglect

2.4.1 Physical signs to look out for:

- Being constantly hungry and sometimes stealing food from others.
- Being in an unkempt state; frequently dirty or smelly.
- Loss of weight or being constantly underweight.
- Being dressed inappropriately for the weather conditions.
- Untreated medical conditions – not being taken for medical treatment for illnesses or injuries.
-

2.4.2 Behavioural signs to look out for:

- Being tired all the time.
- Frequently missing school or being late.
- Failing to keep hospital or medical appointments.
- Having few friends.
- Being left alone or unsupervised on a regular basis.
- Compulsive stealing or scavenging, especially of food.

2.5 Radicalisation

2.5.1 Signs to look out for:

- Emotional changes such as appearing withdrawn or depressed.
- Increase in aggression or isolation.
- Increase in online activity.
- Changes in appearance related to religious observance or group identity.
- Pupil is increasingly judgemental or argumentative.
-

The MSCP can provide advice on the signs of abuse along with the DfE advice *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

Appendix 2

Child Protection – Pupil Disclosure Record

Wimbledon Common Prep School

1 Introduction

1.1 Please note that children 'disclose' in many different ways: through their conduct, creative work and, in addition to direct disclosure, their play and interaction with peers. Younger children are more likely to disclose, but they often lack the vocabulary to do this clearly. Please do be sensitive in your treatment of any issue.

This form comprises part of the school's child protection suite of documents and should be read in conjunction with the Safeguarding Policy, which is available on the school's website, in the handbook and from the school office.

This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a pupil or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the school, for example on an educational visit.

Completed forms must be passed to the school's designated safeguarding lead (DSL), the Head teacher or chair of governors as appropriate, as a matter of urgency in accordance with the procedures set out in the School's Safeguarding Policy.

1.2 The DSL in WCPS is Mrs. Jo Gannon (Deputy Head). The LADO for WCPS works for the MSCP). See the School's Safeguarding Policy for the relevant contact details.

2 Data Protection Information Notes

2.1 The school holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the school, facilitate the efficient operation of the school and ensure compliance with all relevant legal obligations.

2.2 The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 1998. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the school, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.

2.3 The school will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Head teacher or the DSL, it is deemed necessary we may share this record with the Social Services or the Police for the purpose of child protection investigations.

(To be completed by a member of staff)

Remember:

Ask "open" questions and not leading questions, that is, a question which suggests its own answer.

Listen carefully and keep an open mind.

Do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Please complete in black pen

a) Date

.....

Time

.....

Place

.....

Member of staff present and position

.....

Pupil(s) (full name)

.....

b) Before proceeding have you reassured the child that you are there to help them but you cannot guarantee absolute confidentiality? Have you explained that in some cases you may need to pass the information on to ensure the correct action is taken?

Please tick: -

Yes

No

c) Ask the child to explain their concern or allegation and record details of the matter in the box below. Use a separate sheet if necessary and then attach to the form. A non-exhaustive list of the details to be included: -

What was said or done, by whom, to whom and in whose presence,

When the incident took place (date and time) and where,

Whether the child wishes their parents [or legal guardian] to be informed



d) Any other additional comments, remarks or evidence:

Details may include, for example, any concerns you may have about signs of abuse, emotional ill- treatment or neglect from outside of school.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

Concerns about a pupil's welfare must be reported to the designated safeguarding lead (DSL) Mrs. Jo Gannon or, in their absence, the deputy designated safeguarding lead Mrs.Sarah Melsom.

If the complaint involves a member of staff or volunteer, it must be reported to the Head teacher or in his absence to Lord Deighton, Chair of Governors. The report may be made via the DSL or directly via AM.Clarke@kcs.org.uk

DO NOT investigate the matter, as this could prejudice the investigations of outside agencies.

Where the concern or allegation is made against the Head teacher, you must immediately inform Lord Deighton, Chair of Governors, or in her absence Mr. Glen James, vice chair of governors, without first notifying the Head teacher. The chair of governors can be contacted C/o the Secretary to the governors Anna Maria Clarke - AM.Clarke@kcs.org.uk. The report may be made via the DSL. Where the concern or allegation is made against the DSL, or the deputy DSL, you must immediately inform the Head teacher.

See section 18 of the School's Safeguarding Policy for full details about reporting procedures.

Appendix 3

Allegation referral to the LADO Safeguarding

Wimbledon Common Prep School

1 Introduction

1.1 This form comprises part of the school's Safeguarding suite of documents and should be read in conjunction with the Safeguarding Policy, which is available on the school's website, from the school office and on the school's SharePoint. It should be completed by the Head Teacher or Chair of Governors on receipt of an allegation against a current or previous member of staff and following the guidance set out in Allegations of Abuse against Teachers, the Head Teacher, Governors, Volunteers and Other Staff (Appendix 4 of the Safeguarding Policy).

1.2 This form is to be completed by:

the Head Teacher; or

the Chair of Governors, if the complaint is against the Head teacher.

1.3 This form must be completed and passed to the Local Authority Designated Office (LADO) as a matter of urgency after a report is received.

Important:

As soon as there are adequate grounds to think that an allegation (as per the terms in Appendix 4) should be referred to the LADO, this must be done without delay (or in any event, within one working day). If the referral form is not provided at the time of the initial referral to the LADO or the referral is made by telephone, you must complete this form and send to the LADO to confirm the referral within 24 hours. If no response or acknowledgment is received within one working day, you must contact the LADO again.

The Head teacher must be kept informed of all actions taken, unless the Head teacher is the subject of the complaint.

The LADO for WCPS is a member of the MSCP.

2 Data Protection Information Notes

2.1 The school holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the school, facilitate the efficient operation of the school and ensure compliance with all relevant legal obligations.

2.2 The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 2018. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the school, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.

2.3 The school will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Head teacher or the designated safeguarding lead it is deemed necessary we may share this record with the Social Services or the Police for the purpose of child protection investigations.

Please complete in black pen

(a) Date:

.....

Name and position of member of staff making the referral:

.....

.....

Name and position of member(s) of staff against whom an allegation has been made:

.....

.....

Contact details for member(s) of staff against whom an allegation has been made

.....

.....

.....

.....

.....

.....

(b) Pupils details

Pupil(s) (full name)

.....

A non-exhaustive list of the details to be included:

Pupil(s) history and family circumstances

Any Special Educational Needs or Disability

Any previous contact with the LADO concerning the pupil(s) and/or their family (continue on separate sheet if necessary)

(c) Parents' details

A non-exhaustive list of the details to be included:

Marital status; whether the parents are living together or apart and contact details

(d) **Details of the allegation or concern**

Please ensure you include the following information, including details of discussions and reasons for decision made:

- How the allegation or concern came to light;
- The date you were notified of the allegation or concern (if you received a reporting form, please attach a copy);
- What action has been taken so far and by whom including what action has been taken to protect the pupil(s);
- What evidence exists in respect of the allegation or concern (without there having been an investigation by the school);
- Whether the parents have been informed; and the wishes and feelings of the pupil(s) concerned;

(e) Any other additional comments or remarks:

Details may include, for example, particular concerns regarding abuse or neglect from outside of school.

(f) Please record what action you have taken and when:

.....

.....

.....

.....

.....

Full name of member of staff

.....

Signature

.....

Date

.....

Appendix 4

Safeguarding Children

Allegations of Abuse against Teachers, the Head teacher, Governors, Volunteers and Other Staff

Wimbledon Common Prep School

This appendix reflects *Part 4: KCSIE* which will be followed when managing cases of allegations against staff and volunteers who might pose a risk of harm if they continue to work in close contact with children in their present position or in any capacity.

This appendix relates to current members of staff and volunteers. Historic allegations or allegations against a teacher who is no longer teaching should be referred to the police.

There are two levels of allegations/concerns

- Allegations that may meet the harms threshold.
- Allegations that do not meet the harms threshold – low level concerns.

1 Procedure for allegations that may meet the harms threshold.

1.1 The school's procedures for dealing with allegations against staff will be used in all cases where it is alleged that teacher, headmaster of the junior school, head master of the senior school, governor, volunteer or other member of staff has:

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

1.2 The procedures below for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

1.3 Some rare allegations will be so serious that they require immediate intervention by the children's social care services and/or the police. The LADO should be informed of all allegations that come to the school's attention and appear to meet the criteria so that they can consult police and children's social care services as appropriate.

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

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

2 Reporting an allegation

2.1 The reporting requirements for allegations against a teacher, the head teacher, governor, volunteer or other member of staff are set out below. In all cases the member of staff making the allegation may consider discussing his/her concerns with the DSL and making a referral via him/her. The only circumstances in which this would not be appropriate is if the allegation is against the DSL.

2.2 Where an allegation or complaint is made against any member of staff the matter should be reported to the head teacher or in their absence to the headmaster of King's College Junior School.

2.3 Where an allegation or complaint is made against the head teacher, the matter should be reported immediately to the chair of governors or, in his absence, to the vice chair, without first notifying the head teacher. In this case, the allegation will be discussed immediately with the LADO before further action is taken. Contact with the chair of governors can be made care of the secretary to the governors, Mrs AM Clarke am.clarke@kcs.org.uk.

2.4 Where an allegation is made against any governor, the matter should be reported immediately to the chair of governors or the governor with responsibility for safeguarding. If either the chair of governors or the governor with responsibility for safeguarding are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the chair of governors will consult the governor with responsibility for safeguarding and vice versa.

2.5 If it is not possible to report to the head teacher, chair of governors, vice chair of governors or the governor with responsibility for safeguarding in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the head teacher or, where appropriate, the chair of governors, vice chair of governors and the safeguarding governor.

2.6 The person taking action in accordance with the procedures in this appendix is known as the "case manager". The person in receiving the initial report can delegate the role of the case manager to the DSL if they deem it appropriate to do so under the circumstances.

- 2.7 If the allegation falls within the criteria in 1.1 above the case manager should contact the LADO for an initial discussion which will consider the nature, content and context of the allegation immediately and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.
- 2.8 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the LADO and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO what action should follow both in respect of the individual and those who made the allegation.
- 2.9 The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted. It is extremely important that the case manager provides them with as much information as possible at that time.
- 2.10 Where a strategy discussion is needed or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused person. The school will consider, if under the circumstances of the case a person warrants being suspended from contact with children or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspending the employee should be considered prior to taking that step.
- 2.11 Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the case manager should discuss next steps with the LADO and the options open the school to deal with the matter internally. This will depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal, or a decision not to engage the person in future. Suspension will not be a default position and will only be used if there is no other reasonable alternative.
- 2.12 In some cases further enquiries will be needed to enable a decision about how to proceed. If so, the LADO and the case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases the investigation should normally be undertaken by the DSL or if the DSL is not able to undertake the investigation by another member of the senior management team.

3 Disclosure of information and confidentiality

- 3.1 It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or

decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

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

3.3 The case manager should take advice from the LADO, the police and children’s social care services as appropriate to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

4 Supporting those involved

4.1 When dealing with allegations the school will apply common sense and judgement and deal with allegation quickly, fairly and consistently. The school will ensure it provides effective support is provided for anyone facing an allegation including being informed of the allegations or concerns as soon as possible and the likely course of action (unless there is an objection to this by the children’s social care services or the police). The school will remind the employee of access to the school’s welfare arrangements, as appropriate.

4.2 The school will provide the staff member with a named representative to keep them informed of the progress of the case and as a contact in the event they are suspended. The employee will not be prevented from socialising with colleagues unless there is evidence to suggest that this would be prejudicial to the gathering and presentation of evidence.

4.3 The welfare of the child is paramount and this will be the prime concern in terms of investigating an allegation against a person of trust. The DSL is responsible for ensuring that the child is not at risk and provide effective support for the child.

4.4 Parents of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However where a strategy discussion is required or police or children’s social care services need to be involved, the case manager should not share information with the parents until those agencies have been consulted and have agreed what information can be disclosed to the parents. Subject to that, parents should be kept informed of the progress of the case and told the outcome (where there is not a criminal prosecution) including the outcome (only) of any disciplinary process. This information should be shared in confidence.

4.5 Parents must be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing (*s141F Education Act 2002*).

5 Resignations, dismissals and compromise agreements

5.1 If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this policy.

5.2 If a member of staff is dismissed or following an allegation the member of staff resigns or ceases to provide their services the school must refer them to the DBS if the following criteria are met:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

5.3 If the accused person resigns or their services cease to be used and the criteria in 5.2 above are met, it will not be appropriate to reach a settlement or compromise agreement. Any settlement or compromise agreement that would prevent the school from making a referral to the DBS is likely to be unlawful by preventing the school from complying with its legal duty to make a referral.

5.4 It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible. Settlement or compromise agreements, including agreeing a form of words for a reference, should not be used in cases of resignation before the person's notice period expires or refusal to cooperate. Such an agreement will not prevent a thorough police investigation where that is appropriate.

5.5 Where the school dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the school will consider whether to refer the case to the Secretary of State as required by sections 141D and 141E of the *Education Act 2002*. Information about how to refer to the Teaching Regulation Agency can be found [here](#).

6 Record keeping

6.1 Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. A declaration should be kept as to whether the information will be referred to in any future reference.

6.2 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS disclosures reveal information from the Police about an allegation that did not result in a criminal

conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

6.3 The school will retain all safeguarding records and relevant personnel records its information and records retention policy.

7 References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. Any references given will be in line with the guidance set out in KCSIE. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

8 Timescales

8.1 It is in everyone's interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. KCSIE states that 80% of cases should be resolved within one month and 90% of cases should be resolved within three months.

8.2 For those cases where it clear that the allegation is unsubstantiated or malicious they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence the school will conduct an internal investigation. In such cases, if the nature of the allegation does not require formal disciplinary action, the school will aim to instigate appropriate action within three working days. If a disciplinary hearing is required and there is no need for further investigation, the school's disciplinary procedures will be followed.

9 Oversight and monitoring

9.1 The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the three safeguarding partners. The LADO will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

10 Suspension

10.1 The possible risk of harm to a child posed by an accused person should be evaluated and managed in respect of the children involved. In some rare cases that will require the case manager suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family those concerns should be reported to the LADO, police or children's social care as appropriate. Suspension is unlikely to be justified on the basis of concerns alone.

10.2 Suspension should be considered only in a case where there is cause to suspect a child or other children at the school are at risk of harm or the case is so serious that it might be grounds

for dismissal. However, a person should not be suspended automatically; the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school until the allegation is resolved. The case manager will seek advice from the Director of HR and the LADO as appropriate. In the event that an interim prohibition order is in place immediate action must be taken to ensure the individual does not carry out work in contravention of that order.

10.3 The case manager should consider alternative arrangements to suspension provided that that (if involved) the police, children's social care services or the LADO have no objections to the staff member continuing to work during the investigation. The following alternatives should be considered:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Providing for an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that individual is not unsupervised with children;
- Moving the child or children to classes where they will not come into contact with the member of staff, after consultation with the parents and making it clear that the children are not being punished.

10.4 These alternatives allow for an informed decision about suspension and possibly reduce the initial impact of the allegation (depending on the nature of the allegation). The case manager should consider the professional reputational damage that can be caused by suspension where an allegation is later found to be unsubstantiated or maliciously intended.

10.5 If immediate suspension is considered necessary the rationale and justification for this should be agreed with the LADO and recorded by the case manager along with the alternatives considered. The person should be informed in writing on the same day of their suspension with details about the reasons for the suspension. Support should be given as set out in paragraphs 4.1 and 4.2 above.

10.6 Although children's social care or the police cannot usually require a case manager to suspend a member of staff, appropriate weight should be given to their advice and where they are involved, their opinion should be canvassed.

11 Action following a conclusion of a case

11.1 The case manager should consider if the school is required to make a referral under 5.2 and/or 5.5 above.

11.2 If the case follows a criminal investigation, the options will depend on the circumstances of the case as to whether any further action, including disciplinary action is appropriate and if so, how to proceed, taking in account the different standard of proof required in criminal versus disciplinary proceedings.

11.3 Where it is decided that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. The school acknowledges that most people would benefit from support in these circumstances and it may be that a phased return and / or the provision of a mentor in the short term would be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed

if they are still a pupil at the school and will do so in discussion with the DSL or if the case manager is the DSL, the head teacher.

12 Action in respect of unfounded or malicious allegations:

- 12.1 Parents that are found to have made a malicious or deliberately invented allegation, may be asked by the head teacher to withdraw their child from the school on the basis that they have treated the school or a member of staff unreasonably (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).
- 12.2 Pupils that are found to have made malicious or deliberately invented allegations are likely to have breached school behaviour policies. The head teacher may consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion, as well as referral to the police if there are grounds for believing a criminal offence may have been committed.
- 12.3 If a member of staff is found to have made malicious or deliberately invented allegations, the staff member will be the subject of disciplinary proceedings and sanctions if appropriate. The head teacher may also consider whether the matter should be referred to the police if there are grounds for believing a criminal offence may have been committed.
- 12.4 If other persons are found to have made malicious or deliberately invented allegations, the head teacher may also consider whether the matter should be referred to the police if there are grounds for believing a criminal offence may have been committed.

13 Allegations/concerns that do not meet the harms threshold – low level concerns

- 13.1 Concerns against staff may arise which do not meet the harm threshold e.g. suspicion, complaint; or disclosure by a child, parent or adult within or outside of the school or as a result of vetting checks undertaken.
- 13.2 The school promotes an open and transparent culture of trust where all concerns about adults (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately identifying inappropriate behaviour early and minimising the risk of abuse. Staff are clear about and act within their professional boundaries. Information relating to the importance of sharing low level concerns is set out in the staff code of conduct.
- 13.3 A low level concern, no matter how small, is a concern that does not meet the harms threshold. This may take the form of unease or a “nagging doubt” or that an adult working on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct or is not felt to be serious enough to be referred to the LADO e.g. being over friendly with children, having favourites, engaging with a child on a 1:1 basis in a secluded area or behind a closed door, using sexualised, intimidating or offensive language,
- 13.4 Any inappropriate behaviour, which could exist on a wide spectrum, should be reported as set out previously. These concerns must be recorded and dealt with appropriately to protect children but also to protect those working on behalf of the school from false allegations or misunderstandings.

- 13.5 Staff are encouraged to self refer where they have found themselves in a situation which could have been misinterpreted, might appear compromising to others and/or on reflection they believe that they behaved in a way that they consider falls below the accepted professional standards.
- 13.6 Where the concern relates to a supply teacher or contractor the concern should be shared with the head teacher and DSL and recorded as below so that their employer can be notified about the concern so that any patterns of inappropriate behaviour can be identified.
- 13.7 All low level concerns should be recorded by the head teacher and DSL. The record should include details of the concern, the context in which the concern took place, and action taken. The name of the person making the concern should also be noted although their anonymity should be respected as far as reasonably possible. Records will be kept securely and confidentially in line with the school's records retention policy. These records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour is identified.
- 13.8 Where a pattern of behaviour is identified the school will decide whether to follow disciplinary measures or if the behaviour meets the harms threshold to refer to the LADO. The school should consider whether wider cultural issues within the school enabled the behaviour to and how to minimise the risk of it happening again.
- 13.9 When a concern has been raised with the head teacher and DSL then the DSL will collect as much evidence as possible by speaking to the person who raised the concern, to the individual involved and any witnesses.
- 13.10 The information collected will help in categorising the type of behaviour and determine what action may need to be taken.

Appendix 5

Listening to the Pupil Voice at WCPS

Introduction

This document is intended to summaries the ways in which WCPS listens to the opinions of pupils.

1 Class teachers

The class teacher is responsible for the day to day well-being of pupils in his/her class and is the first port of call for pupils or parents should they have any concerns. Class teachers are available to their pupils throughout a school day and this allows pupils to have easy access to raise any concerns. All teachers are expected to listen to pupils, to take seriously and to act appropriately on any concerns. All teachers are given training in safeguarding and child protection, which is refreshed every three years.

Pupils are encouraged to voice ideas and any concerns. Systems operate with the best interests of the child at heart and suitable means are embedded into day to day routines to ensure that children can say what is happening to them and know they will be heard e.g. bubble time, the worry monster, carpet times.

2 Teaching Assistants

Teaching assistants are a regular contact for all pupils and are available throughout a school day for all pupils and this allows pupils to have easy access to raise any concerns. All teaching assistants are expected to listen to pupils, to take seriously and to act appropriately on any concerns. All staff are given training in safeguarding and child protection, which is refreshed every three years.

Teachers including support staff

All teachers and support staff are willing to listen to pupils and to take seriously and act appropriately on any concerns raised.

All teachers and support staff are given training in safeguarding and child protection, which is refreshed every three years.

4 PSHE lessons

The school PSHE programme provides opportunities for pupils to raise concerns on a number of issues, either during class discussion or separately. Specific topics included within the PSHE/ RSE programme give pupils the opportunity to discuss issues which may be of concern as they progress through the School.

5 The Learning Enrichment department

The Learning Enrichment department plays a vital role in the pastoral structure of the school.

Pupils may speak to the LE teacher during an individual or group lesson. As with all staff, there is an open-door policy.

Wimbledon Common Prep School

Brief details for visiting speakers should be forwarded to the Head teacher in advance of the talk and ideally at least one week beforehand.

Introduction

WCPS ('the school') often invites speakers from the wider community to give talks to enrich our pupils' experience. The school recognises the enormous benefit gained by pupils from speakers from all walks of life. Both the school and pupils greatly appreciate the time and effort that visiting speakers put in to their presentations.

The purpose of this policy is to set out the school's legal obligations when using visiting speakers and to set out the standards of behaviour expected from visiting speakers.

This policy supports the aims and ethos of the Safeguarding Policy and takes into account the Educate Against Hate advice [Hosting Speakers on School Premises](#).

Overview

The *Prevent Duty Statutory Guidance (March 2015)*, along with *Keeping Children Safe in Education (September 2021)* expect schools to have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. This policy has therefore been drawn up with regard to the Government's prevent duty guidance and the school's wider safeguarding obligations.

The school's responsibility to pupils is to ensure they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

School protocol

All requests for outside speakers must firstly be discussed with the head teacher.

The school will undertake a risk assessment before agreeing to a visiting speaker attending the school. This will take into account any safeguarding checks considered appropriate in the circumstances, and may include a DBS check if relevant. The school may also conduct research on the visiting speaker and/or their organisation, as appropriate.

The school will obtain an outline of what the speaker intends to cover in advance of the visiting speaker's visit. In some cases, the school may also request a copy of the visiting speaker's presentation and/or footage in advance of the session to ensure it is appropriate to the age and maturity of the pupils to be in attendance.

Visiting speakers will be supervised by a member of staff whilst on the school site. At no point, will a visiting speaker be left unsupervised on site whilst pupils are present. Any concerns for the content or nature of the talk should be referred to the head teacher immediately.

On arrival at the school, visiting speakers who are not existing parents will be required to show an original current identification document including a photograph (such as a passport or photo card driving license and will be asked to sign the Visitors Book. The visiting speaker will be issued with a visitors' badge and the school's safeguarding card, which they must wear/ keep at all times whilst on school site.

The school will keep a formal register of visiting speakers. Any information gathered will be kept in accordance with the school's Data Protection Policy. Plans for a visiting speaker and the completed form (attached) should be given to the head teacher well in advance of the speaker's visit.

If you have any queries regarding this policy, please contact the head teacher.

Checklist for visiting speakers – to be completed and returned to the head teacher

	Action	Details
Details of the arrangements		
1.	Date of presentation	
2.	Name of the staff member responsible for booking visiting speaker	
3.	Name of visiting speaker	
4.	Visiting speaker contact details	
5.	Audience details	
6.	Please confirm that: the <i>Visiting Speaker Policy</i> has been sent to the speaker the visiting speaker has been made aware of the school's obligations to safeguarding by referring them to the school's <i>Safeguarding Policy</i> on the website.	
Checklist		
7.	Visiting speaker basic biography, to include speaker's organisation and other affiliations	
8.	Details of presentation to be provided	
9.	Details of research undertaken on visiting speaker (i.e. check the internet for any recent published reports, statements or speeches made by the individual, any retractions or public apologies etc.)	
10.	Are you satisfied that the content seen in response to 9 above is not in any way contrary to the school's <i>Equality Policy</i> , the ethos of inclusion of the school, British values or any concern in relation to the prevent duty? If such concerns exist, refer the matter to the designated safeguarding lead (DSL).	Yes No (refer to DSL) <i>(Please circle as appropriate)</i>
	Name of person responsible for supervising the visiting speaker whilst they are on site	

Signed:

Date:

Signed:

Date:

Appendix 7

Safeguarding Children

Responding to reports of sexual abuse and sexual harassment

Wimbledon Common Prep School

Child on Child Sexual Violence and Sexual harassment

1. This appendix sets out how the school will **respond to all reports and concerns** of child on child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online (what to look out for, and indicators of abuse are set out in Appendix 1 of this policy).
2. Sexual violence and sexual harassment can occur between two children of **any age and sex**, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in earlier in this policy, all staff working with children are advised to maintain an attitude of '**it could happen here**'.
3. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
4. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships (see also sections on CSE and CCE in appendix 1).
5. Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
6. But it is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
7. [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) contains further detailed information on:
 - what sexual violence and sexual harassment constitutes,

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- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

Responding to reports of sexual violence and sexual harassment

8. The school has systems in place for children to confidently report abuse, knowing their concerns will be treated seriously.
9. The school acknowledges that a failure in recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
10. Decisions in how to respond to an report of sexual harassment or violence will be taken on a case by case basis, with the DSL taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required and in accordance with [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) advice.

The immediate response to a report

11. It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.
12. The school's initial response to a report from a child is incredibly important and can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
13. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by

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reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

14. All staff should be trained to manage a report following school policies and undertaking training which will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- where the report includes an online element, being aware of [searching screening and confiscation](#) advice (for schools) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). **The key consideration is for staff not to view or forward illegal images of a child.** The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising 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 details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made;**

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- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker as the notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Risk assessment

15. When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
 - the victim, especially their protection and support;
 - whether there may have been other victims,
 - the alleged perpetrator(s); and
 - all the other children, (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
16. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school will actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.
17. The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school's own risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Action following a report of sexual violence and/or sexual harassment

What to consider

18. As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of **'it could happen here'**. Staff respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's or college's initial response. Important considerations will include:

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

19. As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school will general safeguarding principles as set out in this policy and in KCSIE. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

20. The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Children sharing a classroom

Immediate response

21. Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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22. Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The school should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).
23. For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school or transport, should be considered immediately.
24. In all cases, the initial report should be carefully evaluated, reflecting the considerations set out at paragraph 18. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

Options to manage the report

25. It is important that the school considers every report on a case-by-case basis as per paragraph 18. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard pupils where required.
26. There are four likely scenarios for the schools to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:
 -

A - Manage internally

- In some cases of **sexual harassment**, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a **zero tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

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- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

B- Early help

- In line with 1 above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support.
- The DSL and pastoral team will use Part one of KCSIE and Chapter one of [Working Together to Safeguard Children](#) for details of the Early Help process.
- Multi-agency early help will work best when placed alongside strong school policies, preventative education and engagement with parents and carers. early help and the option to manage a report internally do not need to be mutually exclusive: the school may manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

C - Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the school should make a referral to local children's social care.
- At the point of referral to children's social care, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school will (especially the designated safeguarding lead or a deputy) be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- The school should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children at the school. . It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes does not jeopardise a statutory investigation. The risk assessment referred to

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above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be **immediate**.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- **All concerns**, discussions, decisions and reasons for decisions should be recorded (written or electronic).

D - Reporting to the Police

- **Any report** to the police will generally be in parallel with a referral to children's social care (as above).
- It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice will help inform the school to decide when to engage the Police and what to expect of them when they do: [When to call the police](#).
- Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

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- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school takes does not jeopardise the police investigation.
- If the school has questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).
- Whatever the response, it should be under-pinned by the principle that there is a **zero tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Unsubstantiated, unfounded, false or malicious reports

27. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.
28. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should first consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.
29. If a report is shown to be deliberately invented or malicious, the school, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Ongoing response

30. Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that school is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. By its very nature, sexual violence and sexual harassment, is likely to have created a power imbalance between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

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- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- The school should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Support can include:
 - Early help and children's social care.
 - Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with the school to ensure the best possible outcomes for the victim.
 - Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school . Contact details for ChISVAs can be found at [Rape Crisis](#) and [The Survivors Trust](#).
 - Child and adolescent mental health services ([CAMHS](#)) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
 - The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact [Rape Crisis](#) (England & Wales) or The Survivors Trust for details of local specialist organisations. The [Male Survivors Partnership](#) can provide details of services which specialise in supporting men and boys.
 - NHS - [Help after rape and sexual assault - NHS \(www.nhs.uk\)](#) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
 - Rape and sexual assault referral centres services can be found at: [Find Rape and sexual assault referral centres](#). Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
 - [Childline](#) provides free and confidential advice for children and young people.

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- [Internet Watch Foundation](#) works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
 - [Childline / IWF: Remove a nude image shared online](#) Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.
31. Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible) and the school should respect and support this choice as far as possible.
 32. A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the school should provide a physical space for victims to withdraw.
 33. It may be necessary for the school to maintain arrangements to protect and support the victim for a long time. The schools should be prepared for this and should work with children's social care and other agencies as required.
 34. It is therefore important that the designated safeguarding lead knows how and where to seek support.
 35. It is important that the school does everything it reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
 36. Whilst they should be given all the necessary support to remain in at school or if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
 37. It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.
 38. **Sharing classes - ongoing response**

When the DSL has decided what the next steps will be in terms of progressing the report they should carefully consider again, the question of the victim and the alleged perpetrator (s) sharing

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classes and sharing space at school. This will inevitably involve complex and difficult professional decisions including considering their duty to safeguard children and to educate them.

It is important that each report is considered on a case by case basis and risk assessments are updated as appropriate. As always the best interests of the child should come first. In all cases the school will follow the general safeguarding principles set out in this policy and in KCSIE.

In all cases the school must record and be able to justify its decisions.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

39. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):
- The school should balance the need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. It can, and should, occur at the same time if necessary.
 - Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials.
 - It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
 - School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file.

Sources of advice and help for schools

- More information on HSB can be found at [Sexual violence and sexual harassment between children at schools and colleges](#). Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning - Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).
- [Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow - [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- Advice on [behaviour and discipline in schools](#) is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.
- [Stop it now - professionals looking for advice](#) provides support for professionals in child sexual abuse prevention, so that they're well equipped to keep children safe.

Appendix 8

Safeguarding Children

Guidance for staff on Peer on Peer abuse

Wimbledon Common Prep School

Appendix 11 **Guidance for staff when dealing with Peer on Peer abuse**

1. **Introduction**

This guidance is intended to amplify the information set out in the *safeguarding policy* and should be read in conjunction with the following policies:

- Anti-bullying
- Children missing in education
- Behaviour

It is intended to assist staff in preventing, identifying and managing peer on peer abuse both within and beyond the school. This guidance complies with the statutory guidance on peer on peer abuse as set out in *Keeping Children Safe in Education (September 2021)* and government guidance [on sexual violence and sexual harassment between children in schools and colleges](#).

2. **What is peer on peer abuse?**

Peer on peer abuse is any form of physical, sexual, emotional and financial abuse and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

Peer on peer abuse can take various form including: serious bullying including cyber bullying, abuse within a relationship, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and / or gender based violence.

Abuse is rarely isolated and will often indicate wider safeguarding concerns for all of the individuals involved in the abuse. Please see the paragraph 3 for information on contextual safeguarding and how that can help staff build a picture of the child's environment.

Research suggests that peer-on-peer abuse is one of the most common forms of abuse affecting children in the UK.

3. **What is contextual safeguarding?**

Contextual safeguarding is particularly important in cases of peer-on-peer abuse because it:

- is an approach to safeguarding children that recognises their experiences of significant harm outside the scope of the family and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
- recognises that as children enter adolescence they may spend increasing amounts of time in other public environments (including the internet) where they may experience abuse;

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- considers interventions to change the systems or social conventions where abuse has occurred eg. Rather than remove a child from a school, professionals could work with school leadership to improve the school environment.

4. **When does behaviour become problematic or abuse?**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to be able to respond to it effectively.

1. Sexual behaviour

Staff should recognise the difference between problematic and abusive or harmful sexual behaviour. The definition of harmful sexual behaviour which the school has adopted is that used by NSPCC and defined as "sexual behaviours expressed by children that are developmentally inappropriate may be harmful towards self or others, or be abusive towards another child or adult." The continuum model developed by Simon Hackett demonstrates the range of sexual behaviours presented by children and may be helpful in understanding how to respond to a child's behaviour (including when the reported behaviour is not sexual in nature, see para 4.2 below.) A table setting out this continuum of behaviours is set out on the following page.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within a group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and /or sexually arousing to the perpetrator
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Intrusive Informed consent lacking or not able to be freely given by victim May include elements of expressive violence	Sadism

4.2 Other behaviour

When dealing with other alleged behaviour which involves reports of, for example, emotional or physical abuse, staff should draw on aspects of the continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- Is socially acceptable
- Involves a single incident or has occurred over a period of time
- Is socially acceptable within the peer group
- Is problematic and concerning
- Involves any overt elements of victimisation or discrimination e.g related to race, gender, sexual orientation, physical, emotional or intellectual vulnerability

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- Involves an element of coercion or pre-planning
- Involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/ children allegedly the subject of that power
- Involves a misuse of power

Some cases may involve a range of behaviours including sexual, emotional physical and digital. Understanding the context in which the behaviour occurs is important.

Behaviour may become abusive over time. It is important for staff to intervene early and address inappropriate behaviour at an early stage. This may prevent behaviour progressing and deteriorating. For example, a physical fight between two children may not constitute peer-on-peer abuse as a one off incident, but may become abusive if the behaviour deteriorates into a pattern of bullying.

Inappropriate behaviour may indicate an emerging pattern of concerning behaviour which may require a whole-school approach in order to prevent escalation

5. How can you identify a child who is being abused by their peers?

Signs that a child might be suffering from peer-on-peer abuse may overlap with other signs of abuse. The *safeguarding policy* sets out the indicators for various types of abuse but signs that indicate this type of abuse are:

- failing to attend school, being disengaged with school, or struggling to carry out school related tasks to the usual standard;
- physical injuries;
- experiencing difficulties with mental health and / or emotional wellbeing;
- becoming withdrawn or shy; experiencing headaches, stomach aches, anxiety or panic attacks, suffering from nightmares or lack of sleep or sleeping too much;
- changes in behaviour including alcohol or substance abuse;
- changes in appearance;
- acting in a way that is in not age appropriate;
- abusive behaviour towards others.

Staff should consider if any behaviour that is out of character or abnormal is the result of an underlying concern which may include abuse by peers. Staff should also be alert to the power dynamic that can exist between children. In all cases of peer-on-peer abuse a power imbalance will exist within the relationship which may be driven by inequality in age or relative social or economic status. Equally, whilst a child who abuses may have power over those they are abusing, they may be simultaneously powerless to others.

5.1 Vulnerable children

Whilst any child can be vulnerable to peer-on-peer abuse, These include:

- previous incidents in respect of that child (eg image of child being shared and peer reaction to that image);
- social isolation or children who by their nature are more likely to follow others;

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- children questioning or exploring their sexuality;
- gender and the child's educational environment. Power dynamics and barriers to disclosure of abuse are different depending on gender and in mixed-sex, single-sex or gender-imbalanced environments;
- children with special educational needs or disabilities.

6. What does the school do to raise awareness of and prevent peer on peer abuse?

The school takes raises awareness and aims to prevent peer-on-peer abuse by:

- training staff on the nature, prevalence and effect of peer-on-peer abuse in the context of the pupils who attend the school;
- educating pupils about the nature and prevalence of peer-on-peer abuse in the context of the pupils who attend the school, via PSHE and drawing on examples in the wider curriculum and reminding pupils of the effects of such abuse and the means by which it can be reported;
- checking with parents what risks they perceive to be facing their child;
- report peer-on-peer abuse issues to DSL so that trends and patterns and pupils in need of support can be identified;
- challenging the underlying attitudes to such abuse;
- creating an open and non-judgemental culture where pupils can share concerns openly and feel that they will listened to;
- responding to cases of peer-on-peer abuse promptly and appropriately.

7. How does the school respond to concerns or allegations of peer on peer abuse?

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on the school environment.

7.1 Responding to allegations

Any response should:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- **treat all children involved as being at potential risk** - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. Schools should ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;

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- take into account that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence.
- The school should consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

7.2 Urgent referrals

If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care should be made immediately by the DSL following the procedure set out in the safeguarding policy. If the referral is made by another member of staff, the DSL should be informed as soon as reasonably practicable.

7.3 Reporting Procedure and immediate actions

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement following the procedure set out for receiving disclosures set out in the *safeguarding policy*.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact the MASH team via the contact details set out in the *safeguarding policy* immediately, and in any event within 24 hours of the DSL becoming aware of it to discuss and agree a course of action which may include:

7.3.1 - Manage internally with help from external specialists where appropriate and possible

7.3.2 – Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family

These services may, for example, include CAMHS or a specialist harmful sexual behaviour team.

7.3.3 – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment

As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

7.4 Individual risk and needs assessment

Where there is an incident of peer-on-peer abuse, the School will assess the needs of each child affected by the abuse by:

- i. assessing and addressing the nature and level of risks that are posed and/or faced by the child;
- ii. engaging the child's parents and if necessary drawing upon local services and agencies to ensure that the child's needs are met in the long-term. Considering whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- iii. conducting reviews at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact the appropriate MASH team to determine the appropriate course of action.

In cases of sexual violence or sexual harassment victim may ask the school or college not to tell anyone. Even if the school does not give consent staff may lawfully share the information if it is the public interest to do so i.e to protect children from harm. Staff should refer to the government guidance [on sexual violence and sexual harassment between children in schools and colleges](#) for more information on confidentiality and anonymity.

7.5 Sanctions

The School will consider whether sanctions may be appropriate for any child/children involved. Any such action should address the abuse, the causes of it, and attitudes underlying it. Sanctions may sometimes be appropriate for the following reasons including:

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) to demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated; and;
- (c) to ensure the safety and wellbeing of other children.

However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the school will *WCPS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.*

always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it.

The school will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this guidance may still be required. Exclusion will only be considered as a last resort, only where it is necessary to ensure the safety and wellbeing of the other children in the School.

7.6 Lessons learnt process

Sanctions alone are rarely able to solve issues of peer-on-peer abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards about the school's response to an incident of peer-on-peer abuse. The DSL will review an incident of peer-on-peer abuse by answering the following questions:

7.6.1 what protective factors and influences exist within the school (such as positive peer influences, examples where peer-on-peer abuse has been challenged etc.) and how can the school bolster these?

7.6.2 how (if at all) did the school's physical environment contribute to the abuse, and how can the school address this going forwards, for example by improving the school's safety, security and supervision?;

7.6.3 did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?;

7.6.4 what was the relationship between the abuse and the cultural norms between staff and pupils and how can these be addressed going forwards?;

7.6.5 does the incident of abuse indicate a need for staff training on, for example, underlying attitudes a particular issue or the handling of particular types of abuse?;

7.6.6 how have similar cases been managed in the past and what effect has this had?;

7.6.7 does the case or any identified trends highlight areas for development in the way in which the school works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?;

7.6.8 are there any lessons to be learnt about the way in which the School engages with parents to address peer-on-peer abuse issues?;

7.6.9 are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?;

7.6.10 does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?; and

7.6.11 were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the DSL and other members of the school's leadership team with responsibility for safeguarding.

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8. Useful Links

The following sites provide more detailed information about the subjects covered in this guidance:

Serious Youth Violence – [Government strategy document](#)

Youth produced imagery – sexting in schools [guidance](#)

[Anti-bullying guidance](#)

[Cyber bullying guidance](#) and [cyberbullying guidance from childnet](#)

[NSPCC guidance on normal sexual behaviour](#)

[NSPCC Harmful sexual behaviour framework](#)

Appendix 9

Safeguarding Children

Contractor policy

Wimbledon Common Prep School

Contractor policy and procedure

This policy and procedure applies to all contractors working at King's College School, King's College Junior School and Wimbledon Common Prep School ('the school') who are required to have unsupervised access to the school.

1. Introduction

This Contractors policy and procedure sets out the school's framework and core principles for the undertaking of vetting checks on contractors in line with the statutory guidance *Keeping Children Safe in Education* and the Independent Schools Inspectorate's (ISI) *Handbook For The Inspection Of Schools*.

1. Definition

A "contractor" is defined as an individual who undertakes work irrespective of whether it is on a long term or short-term basis, under a contract for services. They are not on the payroll of the school, but they are on the payroll of the organisation that employs them, or they are self-employed.

This definition covers a wide range of external providers, from contract cleaners who are on site permanently, to maintenance workers who may be on site for several months to occasional or temporary contractors, who may visit for only a few hours.

2. Procedure

Where a head of department has identified that a contractor or group of contractors needs unsupervised access to the school site they will inform the Human Resources department. Human Resources (HR) will contact the employing organisation requesting a written assurance that all checks, as laid out in the statutory guidance *Keeping Children Safe in Education* and the Education (Independent School Standards) (England) Regulations 2014, both as amended from time to time, have been completed.

In addition, the employing organisation will provide the following information on the form provided by the schools HR department;

- Full name of the individual
- Start date in employee organisation
- Date of Birth
- Date DBS check obtained and by whom
- Any information disclosed on the DBS certificate
- Confirmation that the DBS check is at the enhanced level
- Unique reference number of DBS check
- Recruitment, including gaps in employment, and identity checks carried out at the time of appointment
- 2 x satisfactory references received
- Cleared medical where applicable e.g. coach drivers
- Check of the barred list completed (for those in regulated activity)

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3. Disclosures

If the DBS contains any disclosure, the contracting company must contact the school at least 14 days in advance of the person's planned arrival on site to discuss whether it is appropriate for the person to work at the school.

If the disclosure is deemed low risk and considered appropriate by the school the Human Resources Director in conjunction with the Bursar, Compliance Officer or Designated Safeguarding Lead, will undertake a risk assessment. The outcome of the risk assessment will be communicated to the head of department. This risk assessment needs to be put in place in advance of the person starting work on site.

3. Self-employed contractors

It is not possible for contractors to complete checks on themselves. Therefore, where it is not possible for another individual to carry out the checks on a self-employed individual, the schools HR Department may undertake the checks on their behalf. The school will invoice the contracting company for any costs incurred.

4. After completion of cleared checks

Once HR has received all checks and associated paperwork the contractor should on their first day bring with them the original copy of their enhanced DBS certificate and photo ID. Once verified a photo of the contractors will be taken and a contractors badge issued together with contractor badge guidelines. The contractor's badge must be worn and on show at all times. Any contractor who does not have a badge may be requested to leave the site immediately.

Contractors will also be issued with the *code of conduct for contractors* and the *cleared contractors general safeguarding guidelines* along with a safeguarding reminder card which should be inserted behind the contractor badge.

Code of Contract for Contractors

- Work safely, responsibly and in an open and transparent way. You are responsible for your own actions and behaviour.
- Avoid any conduct which would lead any reasonable person to question your motivation and intentions.
- The taking of photographs of pupils is strictly prohibited.
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This includes contractors working on site during the school holidays.
- Avoid contact with children or young people on the site. Never give your personal details to a child or young person and never ask for theirs.
- Identification badges must be worn in a visible position by all contractors.
- Know where your agreed work area, toilets and access routes are and stay within them and obtain permission if you think that you need to go outside the agreed work area, toilets or access routes. **Pupils toilets are strictly off limits and are not to be used by adults.**

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- The School and grounds are a strict a nut free and no smoking area. Non- prescription drugs and and/or alcohol are not to be brought onto the site. On no account are contractors permitted to work on site whilst under the influence of drugs (with the exception of prescription drugs which have been disclosed to the contractor's manager who has confirmed the contractor is safe to work and/or alcohol.
- Keep staff informed of where you are and what you are doing.
- Do not swear or use inappropriate language. Use of radios and other portable music players is prohibited and all contractors and sub-contractors are prohibited from shouting, spitting, horseplay or any other behaviour that may be considered inappropriate in a school environment.