Responsibilities

Reception-Year 6:

**Designated Safeguarding Lead, with specific responsibility for safeguarding in EYFS (DSL):**

Kathryn Loh (Deputy Head)
kathryn.loh@kgps.co.uk
02089485999 ext. 431/403

**Deputy Designated Safeguarding Lead (DDSL):**

Mark Reed
Mark.reed@kgps.co.uk
02089485999 ext. 414

**Deputy Designated Safeguarding Lead:**

Aidan McLaughlin (Headteacher)
aidan.mclaughlin@kgps.co.uk
02089485999 ext. 402

**Headteacher**

Aidan McLaughlin
aidan.mclaughlin@kgps.co.uk
02089485999 ext. 402

**Safeguarding Link Director:**

Theo Brehony - Managing Director
theo.brehony@gardenerschools.com

Nursery (see separate policy):

**Designated Safeguarding Lead (DSL):**

Rowena Heaton (Head of Nursery & EYFS)
rowena.heaton@kgps.co.uk
02033703301

**Deputy Designated Safeguarding Lead (DDSL):**

Mikhaela Vranesic (Deputy Head of Nursery & DDSL)
Mikhaela.Vranesic@kewgreennursery.com
02033703301

**Most recent update and review by DDSL, September 2025**

*The LADO can be contacted by email: LADO@achievingforchildren.org.uk*
*Telephone: 07774 332675*
*Online: LADO referral form*

## General Principles

The safety and welfare of our pupils at Kew Green Preparatory School is our highest priority. We are committed to providing a secure environment for pupils, staff and visitors and promoting a climate where pupils and adults feel valued and respected and are confident about sharing any concerns which they may have about their own safety or the well-being of others. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful.
This policy is applicable to all 'on' and 'off' site activities undertaken by pupils whilst they are the responsibility of the School. It is made available to parents on the school website and a paper copy is available in the school office upon request.

**Kew Green's Safeguarding Policy draws on the principles of the following documents:**
Human Rights Act 1998

Equality Act 2010

Teacher Standards 2021

Statutory Framework for the Early Years Foundation Stage (2025)

Keeping Children Safe in Education (DfE September 2025) (KCSIE)

Working Together to Safeguard Children (DfE December 2018, updated 2023)

Working Together to Improve School Attendance (updated August 2024)

The Children Act 1989, amended 2004 including Children Act 1989 Care Planning, Placement and Case Review

RSHE 2019 (updated 2021)

Public Sector Equality Duty

Information Sharing: advice for practitioners (2018)

Disqualification under the Childcare Act 2006 (updated September 2018)

What to do if You are Worried a Child is Being Abused (DfE March 2015)

The Prevent Duty Guidance for England and Wales (2023) including a briefing note on the use of social media for online radicalisation

Children Missing Education (KRSCP Revised July 2021)

Independent Schools' Inspectorate: Handbook for the Inspection of Schools, the Regulatory Requirements
The Education (Independent School Standards) Regulations 2014

Sharing of good practice: DSL attends regular meetings with KRSCP Borough and other GSG DSLs
Procedures produced by the Kingston and Richmond Safeguarding Partnership (KRSCP) for Richmond

The London Child Protection Procedures and Practice Guidance

Contents

1. Duty of Care
2. Introduction
3. Role of Proprietors
4. Responsibilities of staff:

   The Headteacher of Kew Green Preparatory School
   Designated Safeguarding Lead
   Deputy Designated Safeguarding Lead
   Board Link Director for Safeguarding

5. Staff training
6. Setting the context

6.1 Definition of Abuse

6.2 Significant Harm

6.3 Child in Need

6.4 Children with special educational needs and disabilities

6.5 Children who are lesbian, gay, bi or trans (LGBT)

6.6 Types of abuse, neglect and exploitation

6.7 Signs and Indicators of possible abuse

7. Specific Safeguarding Issues

8. What action should staff take if they suspect a child is being abused?
Allegation against a child

9. Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors
Low-level concerns

10. Contact details for key personnel and agencies

11. Supporting children, promoting awareness and prevention
How we listen to children

12. What happens following a referral to the DSL

13. Keeping records - Confidentiality

14. Physical Contact with children in school

15. Whistleblowing procedures

16. Appointing staff / Safe Recruitment Procedure

17. Use of Mobile Phones, Digital Photography and Social Media

18. Lettings and Off-Site Arrangements

19. Related policies and documents

20. Review

KGPS Safeguarding Appendices:

1. Safeguarding Agreement
2. Safeguarding Action Flowchart
3. DBS Check Flowchart
4. KGPS Recording of Safeguarding and Welfare Concerns (CPOMS)
5. Physical Restraint/Positive Handling Recording Form

## 1. Duty of Care

This school recognises its duty of care, to work with other agencies in protecting children from harm and responding to abuse. In line with the statutory requirements as specified in the documents referred to above, regarding children's welfare, suitability of people working within the school and appropriate environments, we are committed to:

- Taking necessary steps to safeguard and promote the welfare of children
- Promoting the good health of the children, taking necessary steps to prevent the spread of infection and taking appropriate action when they are ill
- Managing children's behaviour effectively and in a manner appropriate for their stage of development and particular individual needs
- Ensuring that adults looking after children, or having unsupervised access to them are suitable to do so through thorough records of evidence of identity
- Maintaining records, policies and procedures required for the safe and efficient management of the school to meet the needs of the children
- Ensuring adults looking after children have appropriate qualifications, training, skills and knowledge
- Ensuring that all staff (part time and non-teaching staff) have regular training in Safeguarding, which is updated at least every 2 years, in accordance with advice from the Local Safeguarding Children Partnership
- Ensuring that all staff (including part time, voluntary and non-teaching) have read and sign their agreement to comply with school Safeguarding Policy
- Ensure that all regular volunteers (4 days in 30, or once a week –both with the same children) complete thorough vetting process
- Ensure that the DSL, DDSLs and Link Director have relevant training in Safeguarding
- Ensure that DSL and DDSLs meet regularly for updates and conference of issues
- Organising staffing arrangements to ensure safety and to meet the needs of the children
- Ensuring outdoor and indoor spaces, furniture, equipment and toys are safe and suitable for their purpose through risk assessments
- Ensuring staff in a one-on-one situation are clear on safeguarding procedures to protect all involved
- Planning and organising our systems to ensure that every child receives an enjoyable and challenging learning and development experience that is tailored to meet their individual needs

As part of our commitment we will ensure that we have all pupil records from previous schools. We will in turn forward school records to prospective schools if there has been a safeguarding issue under separate cover from the school report, direct to the relevant safeguarding person. Any non-arrival and/or long-term absence of pupils is followed up by the Head of Section.

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would

otherwise perform on our own staff. We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy.

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

## 2. Introduction

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure that their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. Staff should not assume that somebody else will take action: they should always share information with the Designated Safeguarding Lead (or DSL) that might be critical in keeping children safe.

Recognising or suspecting that a child is being abused may be stressful and upsetting. It is easy for people to believe that it couldn't happen to children for whom they care. At KGPS, we work with the understanding that 'it could happen here.'

Children are harmed in all sorts of families and in most instances the person causing the harm is well known to the child. It is important to recognise that abuse to a child can occur not only by the conscious act of abuse but by the omission of providing an adequate environment for the child to grow and develop.

All staff should be alert of the possibility that a child may be being abused and to know what to do should they be concerned about a child's welfare. This abuse, which may be emotional, mental, physical, sexual or neglect, may manifest itself in unusual and worrying patterns of behaviour and/or visible signs of injuries. This document outlines the procedures to be followed in those circumstances in which child abuse is suspected and highlights that children can also be abused by their peers.

All staff should be familiar with the procedures for keeping a confidential, written record of any incidents and with the requirements of the Kingston and Richmond Safeguarding Children Partnership Procedures produced by the Kingston and Richmond Safeguarding Partnership (KRSCP) for Richmond

At KGPS, we recognise our duty of care is to work with other agencies to protect children from harm and respond to abuse. Our policy is to report all cases where the wellbeing of a child is threatened, to the relevant Local Authority Specialist Children's Services or local police force and to log this information in the Child Protection File. All schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements in line with statutory guidance Working together to safeguard children - GOV.UK (www.gov.uk). From September 2019, new safeguarding partners have been set up: the local authority, a clinical commissioning group and the chief of police, will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. KCSIE emphasises that successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families. School and colleges should work with these agencies to promote the welfare of children and protect them from harm.

All staff are well placed to observe the outward signs of abuse, it is therefore important that the school:

- Maintains an environment where children feel secure, are encouraged to talk and are listened to.
- Ensures that children know that there are adults in the school whom they can approach if they are worried.
- Provides help and support to meet the needs of children as soon as problems emerge.
- Supports children who have been abused, in accordance with his/her agreed child protection plan.
- Includes opportunities in the PSHEE curriculum (PSED in EYFS) for children to develop the skills they need to recognise and stay safe from abuse.
- Follows a policy of safe recruitment, checking the suitability of all staff and volunteers.
- Ensures all staff are familiar with the policy and follow procedures detailed in this document promptly when child abuse is suspected.
- Ensures all staff are trained in child protection and any part time voluntary staffs who work with the children are made aware of the arrangements.
- Designates a senior member of staff as Safeguarding Lead, with Deputies.
- Ensures that all staff that have access to children have very clear guidelines on how they should interact with children.
- Ensures the Board of Directors undertakes a rigorous annual review of the school's child protection policies and procedures and of the efficiency with which the related duties have been discharged and corrects any deficiencies or weaknesses in child protection arrangements without delay.

## 3. Role of the Proprietors

The Proprietors takes seriously their responsibilities under Section 175 of the Education Act 2002 and Section 87 of the Children's Act 1989 to safeguard and promote the welfare of children and to work together with other agencies to ensure that they comply with their duties under legislation and that adequate arrangements within the school to identify, assess and support those children where there are concerns about a child's safety and welfare. This is done in line with "Working Together to Safeguard Children" 2023, through effective implementation of the safeguarding policy and procedures and effective communication and good cooperation with local agencies. Proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

The Proprietors of the school will ensure that policies, procedures and training are effective and are compliant with the law. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

The Proprietors will ensure that staff have the skills, knowledge and understanding necessary to keep safe pupils or students who are looked after by the local authority. This includes ensuring that a designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the local authority, the most recent care plan, contact arrangements with parents and delegated authority to carers, and that this information is available to the DSL. Please refer to *Looked After Child Policy*.

The Proprietors will ensure that the school contributes to interagency work where appropriate, for example supporting pupils and staff with the implementation of child protection plans.

The Proprietors should consider how children may be taught about safeguarding, including online, through the curriculum and PSHEE (PSED in EYFS). Particular attention should be paid to the school's practices to help children to adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet.

The Proprietors have appointed a senior member of staff to lead on safeguarding (Kathryn Loh) who is on the Senior Leadership Team and will liaise with the local authority and other agencies and is given the time and training to support staff on child welfare and safeguarding matters, including online safety which, amongst other things, includes and understanding of the expectation, applicable roles and responsibilities in relation to filtering and monitoring (KCSIE).

The Proprietors have appointed a Director, Theo Brehony, who is nominated to liaise with the Local Authority or other agencies in the event of allegations of abuse being made against the Head and is responsible for reporting such allegations directly to the LADO. If an allegation is made against the Head, staff will pass on their concerns directly to the Link Company Director for Safeguarding without informing the Head. Any allegations against staff or volunteers should be referred to the LADO. Where allegations are substantiated, referrals will be made as required to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA). This is a legal duty and failure to refer when the criteria are met is a criminal offence.

The Safeguarding Director is responsible for taking the lead in relation to responsibility for the school's safeguarding arrangements as well as ensuring the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Proprietors must ensure that staff members always act in the interests of the child. The Safeguarding Director is also the link Director for online safety, including filtering and monitoring.

The Board of Directors undertake a rigorous annual review of the school's safeguarding procedures and of the efficiency with which the related duties have been discharged. Each year, the proprietor will sign off the newly updated policy. The school submits the safeguarding self-audit to the local safeguarding children partnership annually and the Board of Directors are aware of action points.

The Proprietors are aware that they have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

Governing bodies and proprietors should recognise the expertise staff build up by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and

shape safeguarding arrangements and child protection policy to ensure it is up-to-date and relevant to the setting our children are in.

## 4. The Responsibilities of staff

The Designated Safeguarding Lead (DSL) for the whole school is Kathryn Loh (Deputy Head). The Deputy DSLs are Mark Reed (Director of Studies) and Aidan McLaughlin (Head). Their roles and the policy apply to all children within Kew Green Preparatory School from Reception-Year 6.

All adults working in this school (including visiting staff, volunteers and students on placement) are required to report instances of suspected or actual child abuse or neglect to the DSL or, in her absence, the Deputy DSLs.

Any concerns about the conduct of a member of staff should be reported to the Head. If the Head is unavailable, or the allegation is against him, the matter should be reported to the Director with specific responsibility for safeguarding. Any concerns related to the Head should be made without informing him. If an allegation related to a member of supply staff

provided by an agency, the agency must be fully involved in the investigation and the school should ensure they are kept informed throughout.

If the allegation is made against a Director, the school should follow their own local procedures. Where an allegation is substantiated, the school should follow the procedures to consider removing them from post.

All staff are aware that if they have safeguarding concerns about another member of staff (including volunteers, supply staff, tradespersons and visitors) they should speak to the Head without delay.
All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. If staff were unable to raise an issue with the leadership team, or if there was a conflict of interest in reporting to the Head, Company Director or Proprietor, staff can call 0800028 0285 and contact the NSPCC whistleblowing advice line. Alternatively, they can be contacted via email: help@nspcc.org.uk Staff are also aware they can pass on any concerns directly to the LADO themselves, be it about an adult or child.

All staff members must be aware of the child protection systems in school, and all should maintain an attitude of 'it could happen here' where safeguarding is concerned.

All school staff

- Sign to say they have read the relevant part of KCSIE annually.
- Have a responsibility to provide a safe environment in which children can learn.
- Will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems.
- Will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure.
- Will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO.

- Attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct).
- Create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns.

Any staff member can refer their concerns to children's social care directly.

IT provider

- Maintains the filtering and monitoring systems.
- Provides filtering and monitoring reports.
- Completes actions following concerns or checks to the system.
-

The Head

- This policy and other safeguarding related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive safeguarding training that is updated regularly.

- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- There are enough staff per child (staff ratios), where relevant and applicable.
- Each child in the Early Years Foundation Stage is assigned a key person.
- The procedures for eating arrangements, food preparation and management of allergies are aligned with the EYFS statutory guidance and clearly explained in the school's supporting pupils with medical conditions policy.

Designated Safeguarding Lead

Kathryn Loh has the lead responsibility for safeguarding and child protection. The DSL is a senior member of staff from our school's leadership team. KGPS has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:

- Reading and following KCSIE.

- Always being available during school hours for staff to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities.
- Working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.
- Contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies.
- Working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of KGPS' role in making referrals about suspected abuse, neglect and exploitation.
- Understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.
- Understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements.
- Keeping the headteacher up to date with safeguarding issues.

- Having the lead responsibility for EYFS and overseeing the DDSL, who has responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports.
- Being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.
- Working with the 'case manager' and LADO for child protection concerns that involve a staff member.
- Making sure child protection files are up to date and kept.
- Making sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually.
- Making sure that all adults who work in or for the school have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE.
- Working alongside the directors and headteacher to review and update procedures and how they are being implemented, including jointly completing and submitting an annual safeguarding self-audit to KRSCP.
- Promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.
- Encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.
- Ensuring that when decisions are recorded, the rationale behind them is also recorded on CPOMS.

Deputy Designated Safeguarding Leads – Mark Reed and Aidan McLaughlin

- Is trained to the same standard as the designated safeguarding lead.
- Will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSIE.

The Proprietors

The proprietors have a duty to ensure the following:

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding children partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- Safeguarding is a standing item on the agenda for directors' meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- An experienced director takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link director).

- There is an appointed designated teacher for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSIE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff sign to say they have read the appropriate part of KCSIE. Directors sign to say they have read and understood KCSIE and this policy.
- Children are taught about keeping safe, including when online.
- The board does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a governor/trustee to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.
- There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The safeguarding director will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- All members of the proprietors receive safeguarding training at induction, which is regularly updated.

The safeguarding link director – Theo Brehony

- They meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the directors' safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

## 5. Staff Training

All staff including Directors, must read and understand at least Part One and Annex A of Keeping Children Safe in Education. Each time Part One is updated by the DfE, existing staff must be informed and asked to re-read the information and confirm understanding. Annex B contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those who work directly with children should also read this annex.

The Designated Safeguarding Lead and the Deputy DSL(s) must receive child protection training every two years. This should include multi-agency working protocols and training in the KRSCP's approach to *Prevent* duties. The DSL and DDSLs must attend Prevent awareness and safer recruitment training, and ensure they have a good understanding of harmful sexual behaviour. Additionally, all training received must cover the criteria in EYFS Statutory Guidance Annex C.

As part of their induction process, all new staff, including temporary staff and volunteers, will be provided with core safeguarding and child protection training (including online safety) at induction that is minimally renewed every two years or sooner if required, covering:

- the school's child protection policy including the whistleblowing procedure
- the staff code of conduct
- the online safety policy
- the pupil behaviour policy
- the identity of the DSL and DDSLs
- a copy of Part 1 and Annex A of KCSIE.
- a copy of Annex B of KCSIE for leaders and those who work directly with children

Our training ensures that staff:

- Can spot the signs of possible abuse, neglect and exploitation.
- Know the school's safeguarding policies and procedures and feel supported and confident to carry them out within their role
- Have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral.

- Know what to do if a child tells them they are being harmed, including how to manage this information confidentially.
- Understand the reasons why children may not feel ready or know how to tell someone that they are being harmed.
- Receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.
- Understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues.
- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.
- Know that children who identify as or are perceived be LGBT or gender-questioning can be targeted by other children.
- Those responsible for children in early years have received paediatric first aid training to be counted within staff-children ratios.

All staff will receive refresher Safeguarding Training at the beginning of each year. This will either be provided 'in house' by the DSL or by a member of the Kingston and Richmond Borough Safeguarding Team. The training will include the KRSCP's approach to *Prevent* duties and any updates to KCSIE. Each term's first INSET day has a Safeguarding refresher scheduled.

Additionally, the DSL writes a Staff Training Plan for each term, aiming to keep safeguarding as a matter of priority throughout the term. A 'Safeguarding question' for staff is included in the Monday bulletin with an information link, which is then discussed in either Whole Staff or Section Meetings; assessment of understanding is completed by the DSL and DDSLs through monitoring of meeting discussion and annotations of the training plan, scenarios-based training and regular quizzes. External providers also deliver INSET where necessary. Staff complete online training modules through

EduCare, along with Directors. Those not present in staff meetings are caught up separately by the DSL. Volunteers and supply staff receive a safeguarding briefing as part of induction by the DSL.

## 6. Setting the context

All those who come into contact with children have a duty to safeguard and promote their welfare. Children's worries and fears will be taken seriously if they seek help from a member of staff and children must never feel they are creating a problem or feel ashamed for making a report. Staff cannot guarantee confidentiality as concerns may lead to referrals to the appropriate agencies in order to safeguard the child's welfare. Staff will inform and involve victims in the process so they feel confident in how their concern will be dealt with.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Definitions

6.1 Definition of Child Abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

6.2 Significant Harm

Some children are in need because they are suffering or are likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The Local Authority is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm (s47 of the Children Act 1989).

6.3 Child in Need

Children who are defined as being 'in need', under the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services (s17(10) of the children act 1989). The critical factors to be taken into account in deciding whether a child is in need under the Children Act 1989 are what will happen to a child's health or development without services, and the likely effect the services will have on the child's standard of health and development.

6.4 Children with special educational needs and disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEND can be disproportionally impacted by issues such as bullying without showing any signs; and children with SEND can be more prone to peer group isolation than other children; and
- communication barriers may exist causing difficulty with investigating what the underlying issues are.

In such cases, additional pastoral support for children with SEND should be considered if there are any concerns that the child might be at risk.

6.5 Children who are lesbian, gay, bi, trans or gender-questioning (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as susceptible as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. Any discrimination we become aware of is firmly addressed in line with this policy

and the behaviour policy. The school will also educate the child who has discriminated, providing them with the support they need to reduce the risk of this behaviour happening again.

When children are questioning their gender, we will provide in-school support and engage external agencies for additional advice, always considering the child's individual needs. Unless it is unsafe to do so, we will work together with the child's parents and carers to ensure decisions are made with the child's input where possible, and always in their best interest.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Government guidance for Gender-Questioning Children is currently under review. The school follows this guidance and decisions regarding children who are gender-questioning will be made in relation to it.

6.6 Types of abuse, neglect and exploitation

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

These appendices are based on the Department for Education's KCSIE guidance.

**Abuse** is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

**Physical abuse** is a form of abuse that 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.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- communicating to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- seeing or hearing the ill-treatment of another
- serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**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. Activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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)
- ensure access to appropriate medical care or treatment - it may also include neglect of, or unresponsiveness to, a child's basic emotional needs

We use the following guidance to help identify and address cases of neglect.
Handling Cases of Affluent Neglect in Schools
Local partnership guidance, including the neglect toolkit

6.7 Signs and Indicators of possible abuse

The recognition that a child may be being abused can be very difficult. It is important that staff report all their concerns, however minor or insignificant they may think they are. They do not need 'absolute proof' that the child is at risk.
Abuse or possible abuse may come to the attention of staff through the following indicators:

- The child telling someone about the abuse
- Unexplained changes in behaviour or personality
- Seeming anxious
- Extreme mood swings
- Depression and withdrawal
- Lacks social skills and has few friends, if any
- Poor bond or relationship with a parent
- Lethargy, unwillingness to be involved
- Unwillingness to communicate
- Unexplained delay in seeking treatment which is needed
- Knowledge of adult issues inappropriate for their age
- Constant minor injuries
- Unexplained bruising

- Physical signs, such as an injury which arouses cause for concern
  - Bruise marks in or around the mouth
  - Black eyes, especially if both eyes are black and there are no marks to forehead or nose
  - Grasp marks
  - Finger marks
  - Bruising of the ears
  - Linear bruising (particularly buttocks or back)
  - Bruises of differing ages
  - Bite marks
  - Burns (including cigarette burns) and scalds
- General physical disability
- Unresponsiveness in the child
- Soiling and wetting
- Attention seeking
- Apprehension
- Antisocial behaviour e.g. uncharacteristic aggression
- Unkempt appearance
- Sexually precocious behaviour
- Sexualised drawings and play
- Sudden poor performance in school
- Poor self-esteem
- Self-mutilation
- Running away or going missing
- Reluctance to return home after school
- Resistance to PE (undressing) or wearing clothes consistently that cover their body
- Difficulty in forming relationships
- Confusing affectionate displays

- Poor attendance or repeated lateness – repeated infections etc.

In addition, staff should be alert to inappropriate behaviour by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities or inappropriate sharing of images. Any concerns about the inappropriate behaviour of an adult working in the school must be reported immediately to the Head, to the Link Company Director for Safeguarding or to the LADO.

## 7. Specific Safeguarding Issues

As with all safeguarding issues involving children, the DSL should be informed at the earliest opportunity.
The designated teacher for looked-after and previously looked-after children is Kathryn Loh (DSL) and procedures are followed as detailed in government guidance (please see Looked After Child Policy).
The designated teacher for young carers is Kathryn Loh(DSL) and the school is aware and follows government advice on how to support the health and wellbeing of young carers.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk.
Annex B in KCSIE contains important additional information about specific forms of abuse and safeguarding issues. All leaders at KGPS and those who work directly with children should read this annex.

Table of Contents


- Children absent from education
- Contextual safeguarding
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- Children and the Court system
- Serious violence
- Schools-related weapons incidents
- Children who run away or go missing from education, home or care
- Mental health
- Drugs and Alcohol
- Homelessness
- Domestic Abuse
- Child-on-child abuse
- Child-on-child abuse: sexual violence and sexual harassment
- Harmful sexual behaviours (HSB)
- Upskirting
- Sharing nudes and semi-nudes
- Honour-based Abuse and Forced Marriage
- FGM
- Modern Slavery
- Private fostering
- Preventing radicalisation and extremism
- Child abuse linked to faith and belief
- Fabricated or induced illness


**All concerns under this section should be addressed in line with the section 8 of this document, unless stated otherwise.**

## Children absent from education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at KGPS to support us in identifying abuse and acting early and the nominated teacher in charge of this is Kathryn Loh (DSL, Deputy Head). Our staff will be aware of our school's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. To support the school's procedure for addressing children missing or absent from

education, we make sure we have more than one emergency contact number for each child. We work in partnership with AfC when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

In line with the EYFS framework, attendance will also be monitored for children attending our setting who are not of statutory school age. We will follow the school's safeguarding procedures if we have any concerns about prolonged absences or if a child is absent without notification from the child's parent or carer despite the school making attempts to contact them. This may include a referral to children's services and/or requesting a police welfare check.

Our attendance policy and procedures are set out in a separate document. The school follows the government's Working together to improve school attendance statutory guidance.

Useful links:
Local partnership guidance
Children Missing Education statutory government guidance

### Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

KGPS will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with AfC's contextual safeguarding team. If there is a specific concern about a child, we will consult with children's services.

Useful links:
Local partnership guidance
Achieving for Children's Risk Outside the Home page
Tackling Child Exploitation multi-agency Practice Principles

### Child sexual exploitation (CSE) and child criminal exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

### Child sexual exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

See the Sharing nudes and semi-nudes section below for details about 'sextortion'.

KGPS follows the London Child Protection Procedures regarding sexual exploitation. Further information on signs of a child's involvement in sexual exploitation is available on The Children's Society's website and Home Office's Child sexual exploitation: definition and guide for practitioners.

### Child criminal exploitation (CCE)

At KGPS, we recognise children involved in CCE are victims, despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

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

- to work in cannabis factories.
- into moving drugs or money across the country (county lines).
- to shoplift or pickpocket.
- to threaten serious violence to others.

- into committing vehicle crime.

### Children and the Court System

KCSIE 2025 guidance directs schools to a guide that supports children in the court system for 5 to 11 year olds (HM Courts and Tribunals Service, 2017a).

### Serious violence

Staff at KGPS will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing.
- signs of assault or unexplained injuries.
- unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

- being male.
- having been frequently absent or permanently excluded from school.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:
Preventing youth violence and gang involvement government guidance

Criminal exploitation of children and vulnerable adults: county lines government guidance
London Child Protection Procedures on gang activity and serious youth violence

### School-related weapons incidents

KGPS follows the AfC School Related Weapons or Potential Weapons Incidents Protocol.. We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search children without consent for a number of 'prohibited items', including weapons covered in the government's Searching, screening and confiscation guidance.

KGPS recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. KGPS will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

### Children who run away or go missing from education, home or care

KGPS recognises that children who run away, go missing or are absent from education and their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, KGPS will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place. We will follow KRSCP's missing children procedure when required.

### Mental health

With mental health concerns, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health concerns affect around 1 in 6 children. KGPS recognises that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health concern. KGPS aims to promote positive mental health for all staff and children. To do so, we take into account the government's Promoting and supporting mental health and wellbeing in schools and colleges guidance.
Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health concern or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond here.
Our MHFA trained staff is: Kathryn Loh

Useful links:
Local partnership guidance
Mind
NSPCC: Child mental health

### Domestic abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

KGPS is in the process of signing up to the police initiative Operation Encompass, a system that ensures the DSL is informed when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, before the child or children arrive at school the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

Useful link:
Local partnership guidance

### Drugs and Alcohol

Through our PSHEE curriculum, we provide age-appropriate education on the risks and effects of drug, alcohol, tobacco and vapes. The school prioritises the safety and wellbeing of children who use, or are at risk of using, drugs or alcohol by adopting a safeguarding-first approach. We understand that drug and alcohol use can be an indicator of underlying vulnerabilities or harm. Staff are trained to recognise the signs of drug and alcohol use and its potential links to other safeguarding concerns. We will work together with external agencies, such as children's services, health professionals and the police, to ensure children receive appropriate early help and interventions. Where there is concern that a pupil is under the influence or that drugs, alcohol, tobacco or vapes are present on school premises, we will act in line with our first aid procedures, behaviour policy and, where applicable, the When to call the police guidance.

Useful information:
Local partnership guidance

### Homelessness

KGPS recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

### Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying).
- abuse between children in an intimate relationship.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online).
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online).
- sexual harassment, such as sexual comments, jokes and online sexual harassment.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- upskirting and initiation/hazing type violence and rituals.

Older children may use any type of child-on-child abuse to 'recruit' younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to 'recruit' other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

KGPS does not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.
- Preventative education as part of our PSHEE curriculum (PSED in EYFS), assemblies, external workshops and Early Help procedures

### Child-on-child sexual violence and sexual harassment

Our school is aware of Ofsted's Review of sexual abuse in schools and colleges. The review was carried out as a result of the large amount of testimonies shared on the Everyone's Invited website, which highlighted the prevalence of sexual harassment and sexual violence.
We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists

on a continuum and may overlap. They are never acceptable and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at KGPS.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND.
- children who are LGBT or gender-questioning or who are perceived to be LGBT/gender-questioning by their peers.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding. KGPS follows Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

### Harmful sexual behaviours (HSB)

Children's sexual behaviours exist on a continuum; the Hackett continuum and appropriate language is used to assess whether any identified sexual behaviours are normal, inappropriate, problematic, abusive or violent. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. KGPS recognises that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputies will:

- have a good understanding of HSB.
- assist in planning the curriculum aimed at preventing HSB.
- ensure staff spot and report inappropriate behaviour to prevent an escalation.
- incorporate our approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

KGPS' curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:

Local partnership guidance
NSPCC Harmful Sexual Behaviours
Stop it Now
Centre of Expertise on child sexual abuse: Resources for education settings

### Upskirting

KGPS will ensure that all staff and children are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

KGPS will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

### Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). Alternative terms used by children and young people may include 'dick pics' or 'pics'. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the alert guidance and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

Our PSHEE (PSED in EYFS) & assemblies programme, along with external workshops, focuses on preventative education.

### So-called 'honour'-based abuse, including FGM and forced marriage

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can

include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

### Female genital mutilation (FGM)

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful

consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

**Section 8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM has been carried out or suspects that a child is at risk of FGM.**

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away - from home (NSPCC).

Signs FGM might have taken place:

- having difficulty walking, standing or sitting.
- spending longer in the bathroom or toilet.
- appearing quiet, anxious or depressed.
- acting differently after an absence from school or college.
- reluctance to go to the doctors or have routine medical examinations.
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed (NSPCC).

Useful information:
Female Genital Mutilation Statutory Guidance
Local partnership guidance
National FGM Centre

### Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

Freedom charity
Handling cases of forced marriage guidance
National FGM Centre

### Modern slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

- The sex industry, including brothels.
- Retail: nail bars, hand car washes.
- Factories: food packing.
- Hospitality: fast-food outlets.
- Agriculture: fruit picking.
- Domestic labour: cooking, cleaning and childminding.

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:
Modern slavery: how to identify and support victims

### Private fostering

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

KGPS is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful links:
Looking after someone else's child
Local partnership guidance

### Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

**Terrorism** is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

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

To prevent children from being radicalised into terrorism, we make sure:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Children are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- We perform a risk assessment assessing how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

The Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity

- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in immediate danger or there is risk to life, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy in the first instance.

The DSL will respond in line with the local referral pathway. They may decide to discuss their concerns with the Council Prevent lead and/or children's services and will make referrals to the police Prevent team and/or the Channel programme where appropriate. The DSL will need to seek the individual's consent when referring to the Channel programme. The DSL will report any online material they become aware of that promotes terrorism or extremism via the Government's online service.

All staff and Directors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link.

The Prevent lead in Richmond is:
Naheem Bashir, Hate Crime and Prevent Coordinator
Richmond and Wandsworth Prevent referral pathway

Useful links:
Local partnership guidance
Protecting children from radicalisation: the prevent duty

### Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs).
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- Ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

Useful links:
Metropolitan Police advice
Short Youtube introduction video
National FGM Centre

### Fabricated or induced illnesses

Staff at KGPS are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our Medical Conditions Policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:
The Royal College of Paediatrics and Child Health (RCPCH) guidance

For further advice, refer to Part 5 of Keeping Children Safe in Education

If staff have a concern about a child or a child makes a report, then they should follow the referral process as set out in the flow-chart on p.24 of KCSIE 2025. As is always the case, if staff have any doubt as to what to do, they should speak to the DSL or a DDSL without delay.

## 8. What action should staff take if they suspect a child is being abused?

Remember it is not your responsibility to decide if a child has been abused. However, it is your duty to act on your concerns by referring them to the DSL. Some of the biggest failures in protecting children from abuse have occurred through omission rather than commission. When in doubt, always seek advice from the DSL.

It is our policy to refer all cases where the immediate safety of a child is threatened to Children's Social Care without prior discussion or agreement with the child's parent, although we will seek to engage with parents beforehand where possible and this will be on a case-by-case basis.

Staff who have concerns that a child is at risk MUST report them to the DSL without delay. Such discussion and agreement must not place a child at increased risk of significant harm.

We differentiate between the safeguarding of a child who has suffered or is at risk of suffering serious harm and a child who is in need of Early Help from one or more agencies. The former would be reported to Children's Social Care immediately; the latter should lead to multi-agency assessment using local processes including use of the "Common Assessment Framework (CAF)" and "Team around the Child" (TAC) approaches.

Ultimately it is the responsibility of all staff to

- take action by making a referral to the DSL so that the child can receive the right help at the right time to address risks and to prevent issues from escalating;
- recognise the early signs of abuse, neglect and radicalisation and refer to the DSL;
- keep clear records which should be passed to the DSL;
- listen to the views of the child;
- reassess concerns when situations do not improve;
- share information quickly; and
- challenge inaction.

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

The flowchart in Appendix 2 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary. Guidance on when to call the police can be found here.

### Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At KGPS, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family, or anonymously – discuss what is happening with the Early Help Resilience Network to ensure all identified needs are supported by the appropriate agencies. AfC's early help assessment tools and plans can be found here. The partnership's Early Help Strategy sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSIE:

- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

### Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. Whenever the DSL or deputy are unsure whether the threshold for a referral has been met, they will consult with the Single Point of Access. The DSL and deputy are aware of the London safeguarding children partnership's threshold document, which will be used to inform their response to any safeguarding concern. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The local resolving professional differences procedure will be used, where necessary.

### If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. will speak to the DSL or a deputy and follow local safeguarding procedures.

### Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the Searching, screening and confiscation: advice for schools guidance.

The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with

appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child or young person.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed.
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the children or young people involved that would influence risk assessment.
- If there is a need to contact another education setting or individual.
- Whether to contact parents or carers of the children or young people involved – in most cases they should be involved.

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

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child in the images or videos is under 13.
- They have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming.
- They become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude.

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
- Is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent/carer in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance. There is further information in the Sharing nudes and semi-nudes section of this policy.

### Child-on-child abuse, including sexual violence and sexual harassment

Responding to allegations of child-on-child abuse

If the concern is that a child may be at risk from another child (either at the school or from outside of the school)

1. Report to the DSL without delay.
2. Log this information on CPOMS.
3. Tell the informant (if appropriate) that you will be passing this information on to people who can help.
4. Don't make any promises. If the informant asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. You will have to tell someone.
5. An allegation may lead to a criminal investigation. Do not do anything that could jeopardise a police investigation, such as asking the young person leading questions or attempting to investigate the allegation of abuse.
6. Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on CPOMS, and ask them if they have told anyone else.
7. Keep all evidence secure whilst being completed, including any notes you may have made in rough.
8. Pass all documentation to the DSL as soon as possible. The DSL will refer the case to Children's Social Care and, if appropriate, to the Police.

### Take no further action unless requested by the DSL.

If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services.

Using the DSL's or a deputy's professional judgement, where there is an allegation of sexual violence or harassment, the school will make decisions about risk level and address the incident based on the Hackett tool (definition below). We will request the support of other agencies, such as children's services and the police, if necessary.
We follow the local safeguarding arrangements when an allegation of sexual violence and/or sexual harassment has been made.

1. Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.

2. Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

For all child-on-child abuse allegations, the DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.
4. The police will still be informed of any criminal offences. If the child is aged under the criminal age of responsibility, the police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it according to our Early Help Procedures.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will 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 services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

## 9. Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors:

In most instances, staff are to report and refer to the headteacher if they have safeguarding concerns about another member of staff who could pose as a risk of harm to children. For guidance around staff conduct – including use of alcohol – please refer to the Staff Code of Conduct.

Where there are concerns/allegations about the Head, this should be referred to Theo Brehony, the Link Company Director who oversees Safeguarding.

In the event where concerns/allegations present a conflict of interest in reporting to the Head or Company Director on the governing board, then the concern should be reported directly to the LADO.

Kew Green works hard and is committed to creating the right culture and environment, so staff feel comfortable to discuss matters both within, and where it is appropriate, outside the workplace in relation to safeguarding the children under our care.

It is important to note that the welfare of the child must be at the centre of all approaches taken regarding allegations. The DSL is responsible for ensuring that the child is not at risk and that any cases of suspected abuse are shared immediately with the local authority children's social care.

In Part Four of KCSIE, it outlines the two levels of allegation/concern.
1) Allegations that may meet the harms threshold
2) Allegation/concerns that do not meet the harms threshold- referred to as 'low level concerns'

1) Allegations that may meet the harms threshold

The following guidance should be followed where it is alleged that anyone working in the school has:

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

There are two different routes of action depending on whether the allegation is made against a member of staff or volunteer working at the school, or another adult who does not work at the school:

A. If a child has made an allegation OR you have your own concerns about the behaviour of another member of staff or volunteer who currently works at the school:

It is imperative that all who deal with allegations made against a teacher, other member of staff or volunteer maintain an open and inquiring mind and takes the allegations seriously. They must be dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child but also supports the person who is the subject of the allegation.
The rights of the child and member of staff must be considered. However, where there is a conflict of interest between the adult and the child, then the child's interests must be paramount as required by the Children Act 1989.

1. Do not take any action that could jeopardise a police investigation, such as attempting to investigate the allegation of abuse or by asking leading questions.
2. Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on the form, and ask them if they have told anyone else.

3. If your information comes from a child, don't make any promises of confidentiality. If the child asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. Instead say that you will pass this information on to someone who has been trained to deal with these situations.
4. Keep all evidence secure whilst being completed, including any notes you may have made in rough.
5. **Once you have logged the incident on the form, recording all relevant details of the concern, you must pass this on to the Head immediately.** If the Head is unavailable, or the allegation is against him, then you should report your concern to the Link Director for Safeguarding.
6. If there is reason to believe that a child (or children) has suffered, or is suffering, actual harm, then a referral must also be made to Children's Social Care. The Head will usually delegate this action to the DSL but may choose to do this himself and inform the DSL of his action (unless the allegation involves the DSL).

7. There are legal restrictions on the reporting or publishing of allegations against teachers and schools must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.
8. **Take no further action unless requested by the Head or DSL.**

Follow up action to be taken by the Head of School (or Link Director for Safeguarding)

If the allegation meets any of the following criteria the Head should report it to the Local Authority Designated Officer (LADO) the same day:

- a member of staff has behaved in a way that has harmed a child, or may have harmed a child;
- a member of staff has possibly committed a criminal offence against or related to a child; or
- a member of staff has behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

Initial consideration

The procedures 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 local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The designated officer(s) should be informed of all allegations that come to the School's attention and appear to meet the criteria so they can consult police and Children's Social Care services as appropriate.

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

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **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.

The Head, or (where the Head is the subject of an allegation) the Link Director for Safeguarding, should discuss the allegation immediately with the designated officer(s). The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history 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 designated officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken regarding the individual facing the allegation or concern. In this case, this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement should be reached on what information should be put in

writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow, both in respect of the individual facing the concern and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, 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. The Board of Directors will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

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 designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the school 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 use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school staff.

However, in other circumstances, such as lack of appropriate resource within the school, or the nature or complexity of the allegation, the allegation will require an independent investigator.

Dealing with allegations of abuse by one or more pupils against another pupil

Staff should recognise that children are capable of abusing their peers. Abuse should never be tolerated or passed off as "banter" or "part of growing up", as emphasised in KCSIE. Child-on-child abuse can manifest itself in many ways including sexting (see above) and specific gender-related issues such as girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

Allegations of abuse by one or more pupils against another pupil, when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, are taken very seriously.

If such an allegation is made, the member of staff to whom the disclosure is made will immediately inform the DSL, who will inform the Head. The DSL will consult with the relevant Children's Social Care referral point and the Link Safeguarding Director where appropriate.

Suspension of the pupil against whom the allegation has been made needs careful consideration and the Head will seek advice from the KRSCP before deciding on the course of action to be taken.
Pupils alleged to have sexually abused another pupil should be subject to a risk assessment for their continuing education on site, in consultation with the KRSCP.

All children involved, whether perpetrator or victim, should be treated as "at risk" in recognition of the fact that children who are abusers may be victims of abuse themselves and will require additional support from the school and possibly other agencies. KCSIE stresses that HSB ("harmful sexual behaviour") displayed be children can be an indicator of abuse. Support in school may include provision of an adult mentor from the staff and/or organisation of one-to-one counsellor from a trained professional.

Supporting those involved and confidentiality

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

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.

Managing the situation and exit arrangements

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. **A referral to the DBS must be made, if the criteria are met.** If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school would not be complying with its legal duty to make the referral.

Record keeping

Details of allegations that are found to have been malicious or unfounded 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. The record should be retained until the person accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

**For further details of the guidance in handling allegations against members of staff, refer to Part Four of Keeping Children Safe in Education**

B. If the concern is that a child may be at risk from an adult who does not work at the school:

1. Report to the DSL without delay.
2. Log the incident on CPOMS.
3. Tell the informant (if appropriate) that you will be passing this information on to people who can help.

4. Don't make any promises. If the informant asks you to keep it a secret, be very clear that in order for you to be able to help you cannot keep any information a secret. You will have to tell someone.
5. An allegation may lead to a criminal investigation. Do not do anything that could jeopardise a police investigation, such as asking the young person leading questions or attempting to investigate the allegation of abuse.
   Let the informant tell you as much as they want to without interruptions. Empathetic listening will assist in clarifying and eliciting information. Make full notes on the CP form, and ask them if they have told anyone else.
6. Keep all forms/evidence secure whilst being completed, including any notes you may have made in rough.
7. Pass all documentation to the DSL as soon as possible. The DSL will refer the case to Children's Social Care and, if appropriate, to the Police.

**Take no further action unless requested by the DSL.**

2. Allegation/concerns that do not meet the harms threshold- referred to as **'low level concerns'**

The term 'low level' does not mean these concerns are insignificant, it only means that the behaviour towards a child does not meet the threshold set out in paragraph 362 of KCSIE.

Staff understand that a low-level concern is any concern- no matter how small, and even no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Kew Green School Staff Code of Conduct; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- being overly friendly with children;
- having favourites;
- talking photographs of children on their mobile phones
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or;
- humiliating children

Staff are empowered to share any low-level safeguarding concerns via the Low-Level concerns Microsoft form.

All staff have access to record on these forms and it can be done so anonymously.
This form is viewed by the Head. KGPS has a culture of openness, trust and transparency. The log of forms will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a pattern is identified, or if concerns move from low-level to meeting the harms threshold, the case will be referred to the LADO. Further information can be found in Part Four of KCSIE

**Whilst the Designated Safeguarding Lead will usually decide whether to make a referral, in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can refer their concerns to local authority children's social care directly (see section 8 below). If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead as soon as possible thereafter.**

**If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

## 10. CONTACT DETAILS FOR KEY PERSONNEL AND AGENCIES

| | |
|---|---|
| Designated Safeguarding Lead:<br><br>02089485999 ext. 02089485999 ext. 403 | Kathryn Loh (KGPS)<br>amy.kinross@kgps.co.uk |
| Deputy Designated Safeguarding Lead:<br>Mark.reed@kgps.co.uk | Mark Reed (KGPS)<br><br>ext. 414 02089485999 ext. 414 |
| Deputy Designated Safeguarding Lead: | Aidan McLaughlin (KGPS)<br>aidan.mclaughlin@kgps.co.uk<br>02089485999 ext. 402 |
| Headteacher: | Aidan McLaughlin (KGPS)<br>aidan.mclaughlin@kgps.co.uk<br>02089485999 ext. 402 |
| Safeguarding Link Director | Mr Theo Brehony (Kew House School)<br>Theo.brehony@gardenerschools.com<br>020 8742 2038 |
| Kingston & Richmond KRSCP | 020 8547 5008 (SPA) |
| Kingston & Richmond LADO<br>DBS referral<br>Teaching Regulation Agency referral | 07774 332675 |

| | |
|---|---|
| DfE helpline for non-emergency advice | 020 7340 7264 |
| DfE email address for non-emergency advice | counter-extremism@education.gsi.gov.uk |
| Police (non-emergency) | 101 |
| Police (emergency) | 999 |

## Children's services

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them.

### Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the Single Point of Access (SPA) website.

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

This government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK

### *Local authority designated officer (LADO)*

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the proprietors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: Submit LADO referral form

## 11. Supporting children, promoting awareness and prevention

We recognise that a child who is abused or witnesses violence may feel helpless, ashamed and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We support all our pupils by encouraging self-esteem and self-assertiveness, through the curriculum as well as their relationships, whilst not condoning aggression or bullying. We promote a caring, safe and positive environment and liaise with a range of support services and agencies involved in safeguarding children.

We have a strong pastoral framework at KGPS which is designed to foster the spiritual, cultural, moral and social development of all our pupils and encourages children to discuss any difficulties they may be experiencing with a member of staff. During circle time and present in other planned times and events, discussions and activities take place focusing on a wide range of pastoral and PSHEE (PSED in EYFS) issues. Throughout the school day and across the curriculum, pupils learn about how to adjust their behaviours to reduce risk, whether this be physical or emotional, and in addition to this children learn about the risks of using technology and the internet. Children also learn about appropriate social behaviour and how to treat others with respect.
We hope that by establishing and maintaining an ethos and environment where children feel secure, able to talk to their teachers and by equipping them with the tools they need to stay safe, we will go some way in preventing children coming to harm. We include within this our attitude and encouragement to teaching the children about British values.

How we listen to children

It may be that you have concerns about a child through your own observations or it may be a situation where a child comes to you as a 'friendly adult' to which they can talk. In either situation, it is vital that the child feels able to speak freely. To try and encourage the 'right atmosphere it will help to consider the following:

- Establish a rapport with the child
- This may well have already taken place if the child has come to you, but in the situation where you are approaching the child, it will help them if you can try and put them at their ease as much as possible.
- Find a time and place where there will be no interruptions.
- Let them know this will be a friendly enquiry rather than an investigation.
- You must be non-judgemental, whatever you are told.
- Reassure the child that they have done the right thing.
- Focus on listening to the child rather than asking questions: allow periods of silence for the child to collect their thoughts.
- Your body language should be non-threatening. Use a relaxed but concerned pose and expression. AVOID PHYSICAL CONTACT UNLESS YOU ASK PERMISSION OF THE CHILD.
- Do not promise confidentiality, or to keep secrets. Instead, explain that you will need to pass this information on to someone who has been trained to help.
- Keep notes of what the child tells you and pass this on to the DSL at the earliest possible opportunity.

## 12. What happens next?

On receiving the concerns with relation to children in need of help or who are the focus of concern, the DSL will:

- clarify the issues with the member(s) of staff raising the concerns
- provide the Head with a full briefing of the situation
- contact Social Services for advice or referral within 24 hours: Contact Richmond Council by phoning: Single Point of Access (SPA) team on 020 8547 5008 spa@richmond.gov.uk

- they may be put in contact with the LADO – Local Authority Designated Officer
- outside of office hours, weekends and public holidays the Emergency Duty team should be contacted by phoning 020 8770 5000. Any serious concern about a child's immediate safety the DSL will contact the police on 999.
- Informal advice may also be sought from KRSCP on 07834 386459. School may refer to the local authority for guidance on thresholds and borderline cases.

Having received information about your concerns/referral, the local authority Children's Social Care (CSC) team will decide within 24 hours what further action should be taken and inform the school of their decision. If the referral has not been acknowledged within 48 hours it is the responsibility of the DSL to follow up the referral.

CSC, within the framework for the Assessment of Children in Need will make an initial assessment, is this a Child in Need, or a Child in Need of Protection and dependant on the seriousness of the situation this may involve the Police. The purpose of the consultation with the police is to discuss details of the referral and make a joint decision about what needs to be done and how quickly.

Remember that the protection of children from abuse must have first priority and even if your cause for concern or those of someone else proves to be unfounded, your action is justifiable if based on concern for the child's safety. Remember that once you have reported your concerns the decision about what further action, if any, should be taken is the responsibility of the local authority CSC team.

## 13. Keeping Records – Confidentiality

Information about safeguarding concerns in relation to a child is confidential. The DSL will ensure that any written information is kept in a locked filing cabinet and that conversations about the safeguarding concerns are kept to a 'need to know' basis. CPOMS records are only shared with appropriate staff. NO RECORDS SHOULD BE KEPT ON THE SCHOOL SHAREPOINT.

The sharing of information between agencies should be done in accordance with any protocols in existence in relation to the Data Protection Act 1999. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information.

However, the law permits the disclosure of confidential information necessary to safeguard a child or children in the public interest; that is, the public interest in child protection may override the public interest in maintaining confidentiality. Disclosure should be justifiable in each case, according to the particular facts of the case and legal advice should be sought in cases of doubt.

## 14. Physical contact with children in school

Many adults will be involved with pupils during the course of the school year. These will include the full and part time teaching staff, peripatetic teachers, school teaching assistants, administrative and maintenance staff (including secretaries, cleaners, caretakers etc.), volunteers (parent readers etc.), governors, invited guests and speakers.

It is important that such adults recognise they can be in a vulnerable position with regard to their relationship with the children. To safeguard the welfare of staff and volunteers and to avoid misunderstandings, we encourage staff to behave as follows:

- Physical Contact - there may be occasions where a distressed pupil needs comfort and reassurance which may include physical comforting such as a caring parent would give. Examples of this would include when children are injured or unwell, missing a parent, upset about an incident in the classroom or playground, etc. It is perfectly normal for a child to receive a cuddle, an affectionate arm around them or to sit on an adult's lap at these times. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact, particularly with the same pupil over a period of time. Where a member of staff has particular concern about the need to provide this type of care and reassurance they should seek the advice of the Head of Section.
- Young children can also thrive from some form of physical contact when they receive praise and encouragement. This is in the form of a cuddle, an affective arm or pat on the back that is carried out in the manner of a caring parent. These gestures should not be excessive or exclusive.
- It may also be necessary to have physical contact with a child who is reluctant to separate from their parent. This is always done with the permission of the parent and done in such a way to separate their child from their parent without causing physical injury. Where a member of staff has particular concern about the need to provide this type of support for a child regularly they should seek the advice of the Head of Section.
- Corporal punishment is prohibited and its use would lead to immediate disciplinary action.
- Where physical restraint is needed, use no more force than is necessary. (Under subsection 548(5) of the Education Act 1996, teachers may use physical intervention to avert 'an immediate danger or personal injury, or an immediate danger to the property of, or a person (including the child him/herself)'. Teachers' powers under section 4 of the 1997 Act to restrain pupils from engaging in certain activities remain in force. Where an employee has taken action to physically restrain a pupil they should make a written report of the incident to the Head of Section, who will in turn inform the parents of what action was taken and why. (See appendix for 'A Physical Restraint Record Form')
- Avoid being alone with a child in a secluded place. Should a child need to be spoken to in confidence, a room with a windowed door should be used and a colleague informed of the intended interview. (Parent volunteers must not be placed in a position where they are alone with a child; they should always be in a public area of the school).
- Always avoid being alone with a child changing for sports or a different activity.
- Avoid becoming personally involved with children and their families on extra-curricular activities. This could lead to accusations of favouritism or undue pressure being applied by the family.
- Document uncomfortable situations that may be misinterpreted (e.g. letters of 'adoration' from pupil to teacher, inappropriate conversations) on CPOMS and inform the DSL.
- Always share concerns about children on roll. DO NOT KEEP SECRETS. Again, inform the DSL and enter details of concern on CPOMS.
- Transporting children in staff cars is not advised under any circumstances
- Children should not be given personal information about staff including mobile phone numbers

- Discourage the use of nicknames and teachers' first names
- Cyber communication – it is inadvisable to directly email and text message between staff and pupils. If it is unavoidable, cc the parents and a member of the Senior Leadership Team
- Gifts should be given fairly and equally, without preference
- Avoid speaking critically to children about other members of staff
- Always maintain a professional manner. Avoid teasing, favouritism and losing one's temper.

## 15. The Public Interest Disclosure Act 1998 (Whistle blowing procedures)

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of the SLT or relevant agencies. Although it can be difficult, this is important where the welfare of children may be at risk. You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings are natural, but they must never result in a child continuing to be unnecessarily at risk. Remember, it is often the most vulnerable children who are targeted and they need someone like you to safeguard their welfare.

In terms of children's welfare and safeguarding, all staff have a responsibility to provide a safe environment in which children can learn. All teachers share responsibility for safeguarding children's wellbeing and maintaining public trust in the teaching profession as part of their professional duties. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime.

If a member of staff has reason to suspect that one or more of the following has taken place, then he/she should feel able to raise the concern with the Head:

Inappropriate or harmful conduct towards a child (or children), including but not confined to:

- Bullying, humiliation, or any other kind of abuse;
- Contravening health and safety guidelines in place to protect children;
- Serious breaches of the school's Code of Conduct;
- Professional practice that falls short of normally accepted standards;
- Compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention; or
- They have concealed or are attempting to conceal any of the above.

The school will fully support staff and do all it can to protect them from any adverse repercussions that may arise from whistle blowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as making contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email email help@nspcc.org.uk.

## 16. Appointing staff

Kew Green School operates a safe recruitment procedure, as set out below, as specified in our Safe Recruitment Policy in line with the Independent School Standards Regulations (March 2014) and KCSIE. The school takes all possible steps to ensure that anybody who will be working at Kew Green School (either paid or as a regular volunteer) is thoroughly checked both to prevent unsuitable people from gaining access to children and to maintain the integrity of the teaching profession. To ensure safer, stringent staff recruitment, Kew Green School will action the following before a candidate takes up a position:

- Disclosure and Barring Service (DBS) Referrals are made to check on suitability for work as documented in our Safe Recruitment Policy

- Identity – proof of identity should be supplied in the form of a passport or similar official documentation with picture, copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file
- Academic Qualifications – verification of qualifications should be done by looking at relevant certificates or diplomas, or a letter of confirmation from the awarding institution. If original documents are not available, a properly certified copy must be produced.
- Professional and Character References – these should always be taken up and directly with the referee. It is not good practice to rely solely on testimonials provided by the candidate or on employers who are not the most recent or current.
- Previous Employment History – Always obtain satisfactory explanation for gaps in employment history. If a candidate for a teaching post is not currently employed as a teacher, a check with the school at which they were most recently employed should confirm details of their employment and their reasons for leaving.
- Overseas check - If employment history is from overseas, a relevant report needs to be obtained from the appropriate authorities of that country in order to satisfy our knowledge that the potential employee has met all suitable child protection procedures in that country.
- DBS checks- The DBS is responsible for deciding whether an individual should be barred from working with children and vulnerable adults and for maintaining a list of those individuals who are determined to be unsuitable (the barred list). The DBS will consider cases that concern safeguarding matters (i.e. harm or the risk of harm to a child), barring individuals from working with children where appropriate. More detail about the role of the DBS can be found at Gov.uk.

  Portability of an individual's DBS came into force on 17th June 2013. This means that any individual who has had a DBS check on or after this date can subscribe to the Update Service for a nominal amount per year which allows them to take it with them from role to role within the same workforce. Each employer will then, with their permission, look at their current DBS Certificate to check it is the same level and type and do an online Status Check.

- Prohibition check - A prohibition order means that the person concerned is not allowed to undertake unsupervised teaching work in schools. Where an individual is prohibited, their details will appear on the Prohibited List. The Prohibited List is administered by the NCTL and can be accessed by current and prospective employers of school

staff via the Employer Access Online System. This service also provides information about any teacher qualification held and whether induction has been passed. The service is offered free of charge to schools, local authorities and teacher supply agencies in England. A prohibition order is likely to be appropriate when the behaviour of the person

concerned has been fundamentally incompatible with being a teacher. The primary purpose of a prohibition order is to protect pupils. A prohibition order is a lifetime ban, though in some circumstances the teacher may be able to make a request to have it reviewed after a specified period of time.
For those members of staff taking on management and leadership positions of the level of Head of Department or higher, a prohibition from management check needs to be performed (from September 2015). This is done as part of the DBS check.

- Barred List –can be used to confirm if an individual is or is not barred from working with Children. DBS check of a person's suitability to work with children will contain details of whether they are included on the Barred List Check.

- Right to work in the UK – proof is obtained that the candidate is eligible to work in the UK.
- Health – Anyone appointed to a post involving regular contact with children should be medically (physically and mentally) fit. Staff will be asked to sign a declaration to confirm they are medically fit to work with children at the time of appointment. Staff must inform their Head of Section if they are taking medication which may affect their ability to care for children and any staff medication must be securely stored at all times.
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 set out who is disqualified from working with children.

  In order for the schools to demonstrate compliance, the Company requires staff to complete and sign the Staff Suitability Self-Declaration form when a candidate has been shortlisted for a position (prior to DBS being received) in order for this to be discussed and considered at interview, and this is recorded on our central register.

  All members of staff have a duty to inform the Head if their circumstances change in a manner that potentially makes them subject to disqualification.

- Safe Recruitment – as from April 2006, at least one member of the interview panel should have Safe Recruitment training. KCSIE guidance states that an online search should be considered prior to shortlisting, candidates should be informed that online searches may be done as part of due diligence checks. Appropriate child protection checks and procedures also apply to any staff employed by another organisation and working with the school's pupils on another site (for example when on residential trips). For further details please refer to the school's Safe Recruitment Policy.

  The Deputy Head will ensure supply teachers complete the 'Supply Safeguarding Induction Pack' which involves their providing proof of ID, their reading and signing agreement to abide by Kew Green School's Safeguarding Policy and Professional Code of Conduct for Staff, as well as providing evidence of current and appropriate DBS checks.

  A central register of recruitment and vetting checks is kept for all members of staff, (including volunteers and others brought into the school such as supply staff) by the school office. All staff (including temporary and voluntary) will be provided with the Safeguarding Policy and the Code of Conduct on induction.

  The school will promptly report to the Disclosures and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child or because he or she is considered unsuitable to work with children. In this context, ceasing to use a person's services includes:
  - dismissal

- non-renewal of a fixed-term contract
- no longer engaging/refusing to engage a supply teacher provided by an employment agency
- terminating the placement of a student teacher or other trainee
- no longer using staff employed by contractors or volunteers
- resignation

- voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the Department for Education's register. The school will also make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are:

- unacceptable professional conduct,
- conduct that may bring the profession into disrepute or
- a conviction, at any time, for a relevant offence.

Further guidance is published here.

## 17. Use of Mobile Phones and Social Media

Guidance for all staff is written in our 'Mobile Devices Policy', 'Acceptable Use Policy' as well as our online-safety documents. All reference to 'Mobile devices' also includes wearable smart technology such as smart watches.

Children have their photographs taken to provide evidence of their achievements for development records as well as displays and promotional media such as our in-house magazine (Kew Life) or our website. Under the Data Protection Act 1998, before any child joins the school, we obtain parental permission to take photographs or to film them. This permission covers the use of the photographs of the children taking part in an activity to advertise/promote the school.

Staff are advised to keep contact with children on a professional basis and to be prepared for their mobile devices to be open to scrutiny upon request from the Head.

Use of personal mobile devices is not permitted where children are changing.

Use of personal mobile devices is not permitted by members of KGPS staff within classrooms (including the Early Years classrooms). The use of personal mobile devices is not permitted by parents and volunteers. If a parent or other adult is visiting a classroom and they have their mobile device accessible, then they will be requested to put it away.

All KGPS staff adhere to the below statements with regards to use of personal mobile devices:

- I will ensure my personal mobile is on silent, locked and completely out of sight during teaching time apart from momentarily when required for 2 step verification log ins. E.g., for CPOMS and ISAMS.
- I will not use my personal mobile phone during teaching periods unless permission has been given by a member of SLT in emergency circumstances.

- I understand that I may use my personal mobile phone where a risk assessment of an event or activity identifies a requirement for a personal mobile phone (e.g., travelling between school site or during a school trip), and the Head has provided permission, and this is recorded in the relevant risk assessment.
- I will not use my personal mobile phone to make or take calls, text or for any other purpose within earshot or sight of pupils. This includes communal areas such as corridors and hallways, unless in an emergency.

Personal mobile devices should not be used for the taking of photographs or video footage of pupils. Only devices which have been provided the School, such as iPads, Digital cameras and school mobile phones can be used for this purpose. This applies to all year groups, including the Early Years Foundation Stage.

Social media:

Staff are forbidden to use social media for purposes of contact with any child.

Staff are required to keep a 'professional distance' from the parent body in this respect and are strongly advised NOT to enter social media exchanges with any parents.

Staff are reminded that Social Media security settings of their own accounts should be considered to prevent 'browsing' parents and/or children scrutinising their online activity.

## 18.Lettings and Off-Site Arrangements

When services or activities are provided by the Board of Directors, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's Keeping children safe during community activities, after-school clubs and tuition non-statutory guidance. This includes checking that the provider has completed the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

### Extended school and off-site arrangements

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy.

We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put a child at risk, and where a child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement where safeguarding concerns arise and reserve the right to terminate the arrangement if concerns are not adequately addressed.

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

Where an **allegation is made about an out of school provider**, including individuals who hire the school's premises, the school will work with third-party agencies and/or organisations, leading the investigation as per the procedure detailed in Section 9.

## 19.Related Policies and Documents:

- Staff Handbook
- Staff Code of Conduct
- Health and Safety Policy
- Anti-Bullying Policy
- Online Safety Policy
- Intimate Care Policy
- Medical Conditions Policy
- Mobile Devices Policy (includes smartwatches)
- Low Level Concerns Policy
- Looked After Child Policy
- Induction Policy
- Supervision of Pupils Policy
- Procedure for a Missing Child Policy
- Attendance & Children Absent or Missing from Education Policy
- PSHEE Policy
- Behaviour, Rewards and Sanctions Policy
- Safe Recruitment Procedures

## 20.Review

This policy and its procedures are reviewed annually by the DSL with the Head, and the Link Director for Safeguarding.
Last review date: June 2015

Last review date: Sept 2016
Last review date: Oct 2017
Last review date: January 2019
Last review date: July 2020 in light of coronavirus
Last review date: Sept 2020
Last review date: Sept 2021
Last review date: Sept 2022
Last review date: Sept 2023
Last review date: Sept 2024
Last review date: May 2025, in light of AfC Report
Last review date: Sept 2025 (DDSL)

## KGPS Safeguarding Appendices:

1. Safeguarding Agreement
2. Safeguarding Action Flowchart
3. DBS Check Flowchart
4. KGPS Recording of Safeguarding and Welfare Concerns (CPOMS)
5. Physical Restraint/Positive Handling Recording Form

## 1. Safeguarding Agreement

Please read the attached copy of our Safeguarding Policy as well as Part 1 of Keeping Children Safe in Education, including the annex (DfE Sept 2025) and sign agreement to the guidelines below to ensure consistency of behaviour toward children in our school:

- Do not have undue physical contact with a child. Should a child be hurt or in distress use 'common sense' in your physical contact. Be sympathetic and caring but do not invite or have unnecessary or prolonged physical contact.
- On no account shall corporal punishment be used.
- Never at any time have 'secrets' with a child. If preparing a mother's day card, for example, tell the child it is a surprise for mummy, not a 'secret' to be kept between you.
- If a child needs to be undressed in the case of an 'accident' or an injury requiring further inspection, the child should be encouraged to undress them self, if possible in privacy. Do not stay with an undressed child, alone in a closed room; leave the door open or ajar and stand with your back to the child while they are changing, if possible asking another adult to assist so you are not alone.
- Personal mobile devices should not be used for the taking of photographs or video footage of pupils. Only devices which have been provided the School, such as iPads, Digital cameras and school mobile phones can be used for this purpose.
- On no account should private contact be made with a child via, for example email, letter or phone without the parent's knowledge and consent. If it is unavoidable, please cc the parents and a member of SLT.

- If you are concerned at any time about a child for whatever reason, or the behaviour of a member of staff, tell the DSL immediately. You are not expected to make any judgements, but it is your responsibility to alert the DSL of any concerns you may have.

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Safeguarding Agreement

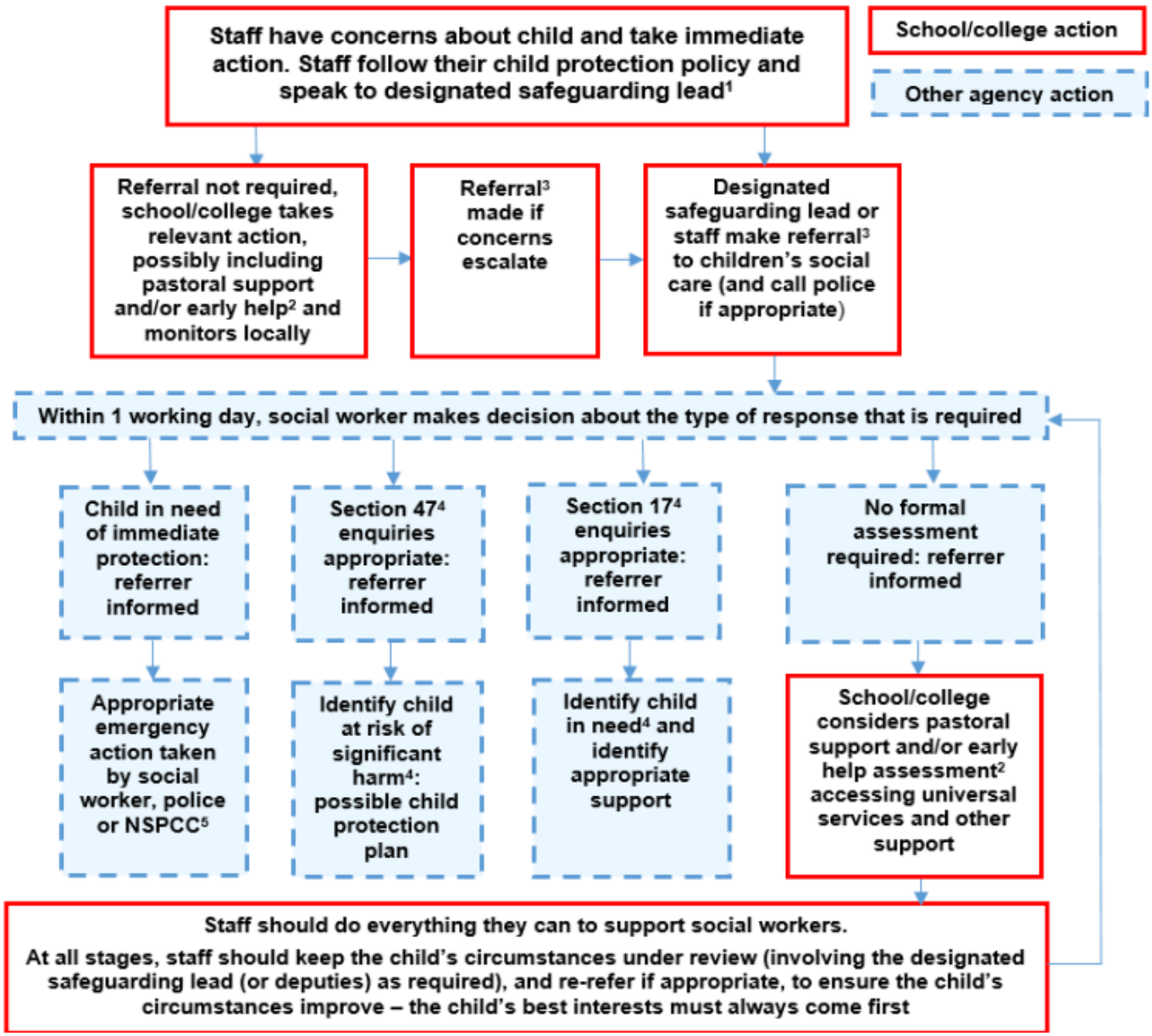
I _____ in my capacity as_____
have read **and understood** the Safeguarding Policy and agree to follow the above guidelines at Kew Green Preparatory School.
Signed: _____ Date: _____
Please return completed slip to the school secretary, thank you.

## 2. Safeguarding Action Flowchart

### Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral.

**Figure 1**

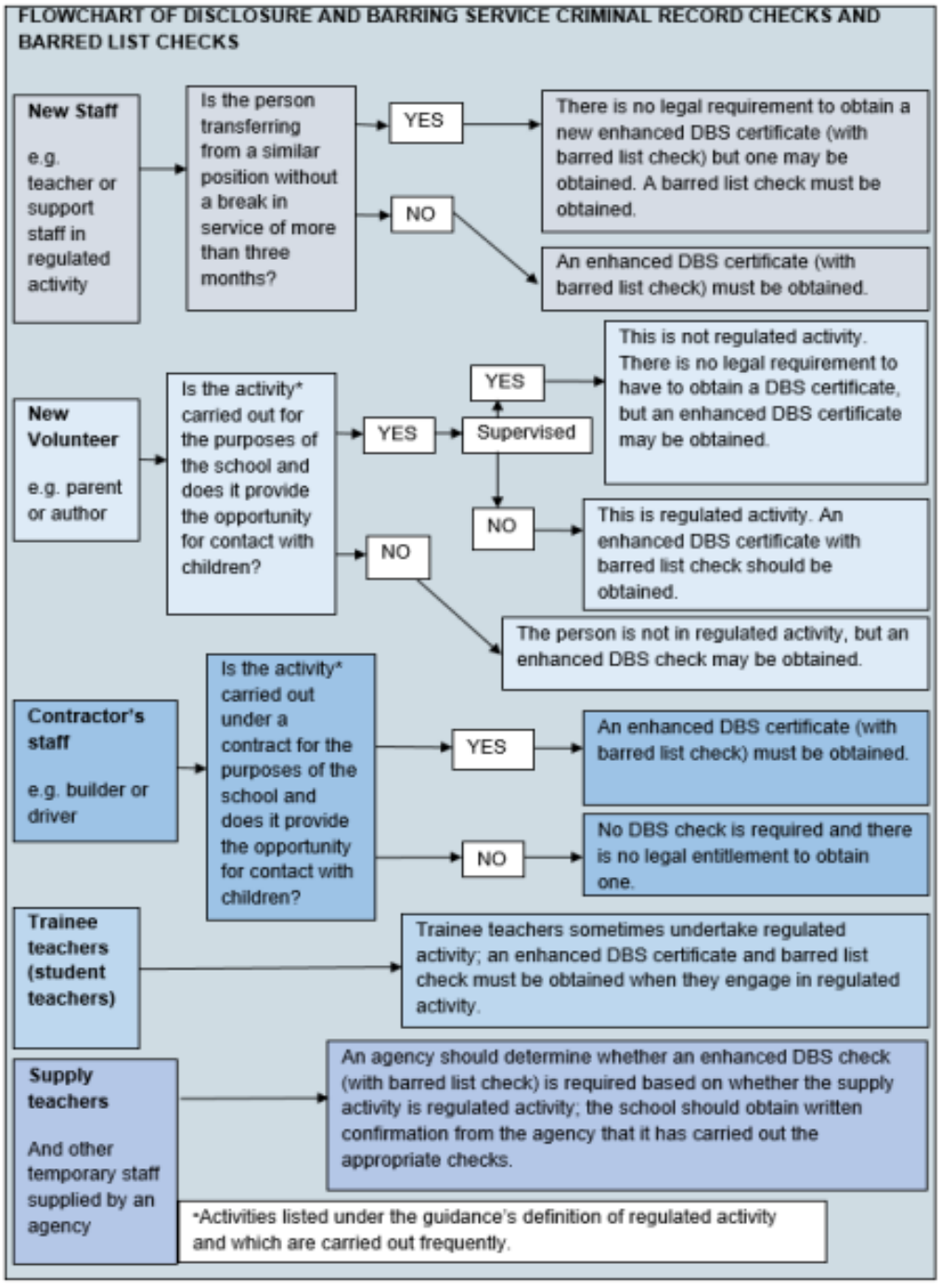



*paragraphs refer to KCSIE (2025)

[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of KCSIE 2025.

[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

## 3. Flowchart of DBS and Barred List Checks

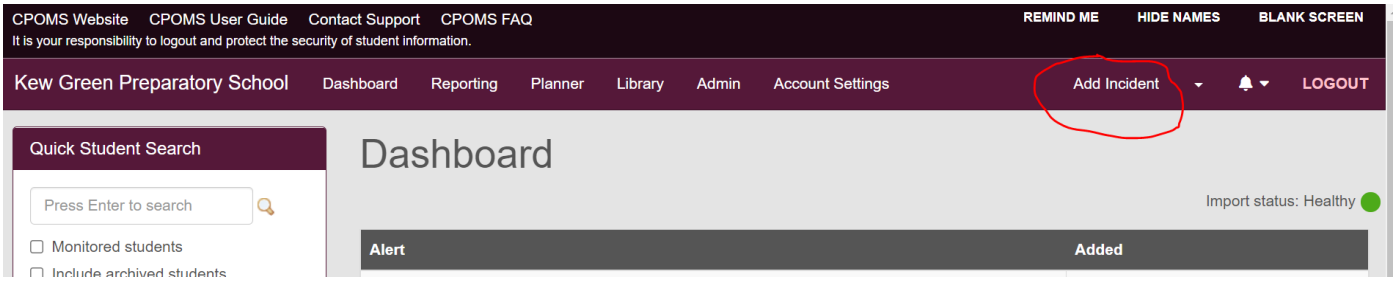

FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

## 4. KGPS Recording of Safeguarding and Welfare Concerns

At Kew Green, we use the online software CPOMS for recording all safeguarding, welfare and pastoral issues. It is a secure system that allows us to build a rounded picture of each pupil and track any trends or issues with concerns throughout their time at the school. All staff are given a secure login and trained how to record any concerns as part of their induction process. The DSL and DDSLs are always available to assist staff with recording concerns when necessary.

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely and access will only be given to those who need it.

To report an observation, incident or safeguarding concern, staff need to login to CPOMS, and click on the 'Add Incident' tab at the top of the dashboard. Selecting the correct category ensures that the appropriate people are notified, and access to the record is restricted appropriately.



5. Physical Restraint/Positive Handling Recording Form

All incidents of Physical Restraint/Positive Handling are recorded and tracked on CPOMS.
This can be via a scanned copy of the form below, or a CPOMS entry that includes all details listed below.

Name of Pupil…… Class ……

A description of the build-up to the event including the reason why positive handling was used (e.g. to prevent injury to others, self-injury, damaging property, or an attempt to leave the premises) and also including details of any adult witnesses (if applicable)

Describe how you went about positive handling the child

Name of member of staff……..

Staff signature……..Date……

Witness signature (if applicable) …… Date……..

Head of Section's signature……Date……

Parent's signature ……..Date……