

HOLLAND HOUSE SCHOOL



7a SAFEGUARDING POLICY - Whole School including EYFS

Review of Safeguarding Arrangements:

Date	1st September 2021
Approved	
Review Date	1st September 2022

1 Related Information

1.1 Availability of Statutory Policies

All statutory policies are available on the School's website.

1.2 Statutory Guidance

This statutory policy has been reviewed in accordance with the following guidance:

ISSR Part 7

The standard in this paragraph is met if the proprietor ensures that-

- (a) arrangements are made to safeguard and promote the welfare of pupils at the School;
- and
- (b) such arrangements have regard to any guidance issued by the Secretary of State.

1.3 Supporting Documents

The following related information is referred to in this policy:

Anti-Bullying and Racism Policy
Behaviour, Rewards and Sanctions Policy
Code of Conduct for Staff
First Aid Policy
Missing Child Policy
Safer Recruitment Policy
Whistleblowing Policy
Mental Health and Well-Being Policy
e-safety Policy
Children Missing from Education Policy (within this policy)

1.4 Terminology

Head, where not explicitly defined, means the Head of the School.

Parents includes one or both parents, a legal guardian, or education guardian.

School means Holland House School.

Pupil or Pupils means any pupil or pupils in the School at any age.

2. Safeguarding Statement

Safeguarding underpins everything the School does with children if they are to thrive in all areas of life at the School and beyond. Every member of staff, supply staff, volunteer or contractor who comes into contact with children at the School has a role to play in safeguarding, a responsibility to act and to be confident reporting concerns, sharing information and putting the child's needs first, regardless of how difficult it might be or how uncomfortable it might feel. Staff are encouraged to maintain the attitude of 'it could happen here.'

This policy has been authorised by the Governors, is addressed to all members of staff, supply staff, including visiting music teachers, sports coaches and volunteers. It is available to Parents via the School website and also available to Parents in paper form on request. It applies to all those who work with Pupils even where this is away from the School, for example, at an activity centre or an educational visit. This policy has been developed in accordance with, and is directed by, the following legislation, statutory guidance and advice:

- Children and Social Work Act 2017
- Children Missing in Education (September 2016)
- Counter-Terrorism and Security Act 2015
- Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (2015)
- Keeping Children Safe in Education (KCSIE) (September 2021)
- London Safeguarding Children Board Child Protection Procedures 5th Edition 2016
- Prevent Duty Guidance for England and Wales (March 2015)
- The Advice and Guidance from the Safeguarding Partnerships and their Child Protection School Liaison Office
- The Children Act 1989, 2004
- The Education Act 2002
- The Female Genital Mutilation Act 2003 (via the Serious Crime Act 2015)
- The Prevent Duty (Departmental Advice for Schools and Childcare Providers June 2015)
- What to do if you are worried a child is being abused (March 2015)
- Working Together to Safeguard Children (July 2018)
- Voyeurism (Offences) Act 2019
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (September 2021)

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2021)

This policy aims to be a child-centred policy where the needs and views of the child are foremost in the decision-making and in the policy itself. Children want to be respected, their views heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs. “Nothing is more important than children’s welfare” (Working Together to Safeguard Children July 2018). This premise underpins the provision and planning of PSHE and RSE lessons, form time and assemblies, the reviewing of anti-bullying procedures and policies, as well as the positive relationships Pupils have with teachers and the range of staff available for Pupils to turn to for support.

No single professional can have a full picture of a child’s needs and circumstances. In order for children and their families to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy is reviewed annually, approved by the Board of Governors and signed off by the Chair of Governors. There may be a need, either through reviews or a change in staffing, legislation or guidance, to update the policy at any time during the School year. If this is the case the DSL would inform the governing body via the Governor with responsibility for safeguarding matters. The Safeguarding Governor pays regular visits to check that safeguarding processes are in place and being followed and produces an annual report to the Governing Board on safeguarding matters.

The School fully recognises its duties and responsibilities in respect of child protection and the safeguarding of all its Pupils is its highest priority. Every member of staff, supply staff, including visiting music teachers, sports coaches, volunteers and Governors is under a general legal duty to:

- Protect all children from all kinds of abuse
- Be aware of the School’s Child Protection procedures and to follow them
- To always act in the best interests of the child, ensuring early help is sought whatever the concern.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (KCSIE (September 2021)). Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even

if they are not suffering harm or at immediate risk. “Children” includes everyone under the age of 18 (KCSIE (September 2021)). The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

This policy is applicable to all pupils, including those in the EYFS. The local safeguarding partnership is Barnet Safeguarding Children Partnership (Barnet SCP) and the School follows its procedures, including multi-agency safeguarding arrangements.

2.1 Aims

The School recognises and implements:

- The maintenance of a safe environment in which children can learn, develop, are listened to and encouraged to talk;
- A support network, so that children are confident that there are adults to whom they can talk to if they are feeling worried;
- Raising awareness of Child Protection (CP) issues and equipping children with the skills needed to keep them safe;
- Guidance for staff on the support of children who have been abused;
- Safe recruitment procedures in compliance with regulations;
- Development, monitoring and review of procedures for identifying and reporting cases, or suspected cases of abuse;
- Any deficiency in CP policy or procedure is recognised and remedied.

The Statement of Aims in the School Prospectus states:

“Our aim is to provide a school where children are happy and productive. We believe that education can be fun and that enjoyment of school life does not preclude high academic achievement.

We believe that confidence and self-esteem, even in the young child, follow intellectual development be it academic or moral.

All children are strongly motivated by the staff to give of their best in the belief that every child has something important to offer. Achievement, in whatever field, is rewarded.

Each child is helped to discover and to do what is right, to continually develop all the qualities of good character, including productiveness, honesty and justice to all.

The School seeks to identify the most that each child can do and then to make it possible for each child to achieve the most.”

Safeguarding children means:

- Protecting children from maltreatment;
- Preventing the impairment of children’s mental and physical health or development;
- ensuring they grow up in circumstances consistent with the provision of safe and effective care and;
- taking action to enable all children to have the best outcomes.

3. The Designated Safeguarding Lead and other Key Staff

The School has appointed a Designated Safeguarding Lead for Child Protection (DSL) who takes responsibility for all safeguarding and child protection matters, (including online), - which includes liaising with the local authority, liaising with the School Governor responsible for safeguarding matters, training (staff, governor and appropriate training), secure record-keeping and transfers of such records, as well as maintaining an overview of safeguarding within the School. See Appendix A – Role of the Designated Safeguarding Lead.

The DSL has the time, status and authority to be responsible for such matters. They are supported by the Head in their role. The Parents are welcome to contact the DSL if they have any concerns about the welfare of any child in the School, whether their concerns relate to their own child, another child in the School or to any other member of the School community. The Parents or Pupils may also discuss concerns with a form tutor or another member of staff who will notify the DSL in accordance with the procedures outlined in Section 6 “Identifying and Recognising Signs of Abuse and Neglect” and Section 7 “Reporting Concerns”. If concerns relate to a member of staff, Parents or Pupil should contact the Head. All staff, including the DSL, will always report allegations of abuse against staff to the Head without delay (see Section 8 on “Allegations”). If the concern relates to the Head, they should contact the Chair of Governors.

The DSL receives updated child protection training at least every two years so that they have a complete safeguarding picture. This will include local inter-agency working protocols and training in Prevent duties. This is supplemented with regular updates, for example, scenario training, e-bulletins and staff meetings at least annually. The DSL has relevant multi-agency training to make referrals and would normally lead on referrals, including those to Channel (the Prevent referral programme). The DSL will also support staff who make direct referrals to Social Care or Channel, and is available for general safeguarding advice for Pupils, staff and Parents.

The Designated Safeguarding Lead (DSL) is Mrs Raksha Dave who is a member of the Senior Leadership Team (SLT). She is also the practitioner responsible for safeguarding in the Early Years setting.

Pupils, staff and Parents are able to seek safeguarding support or advice during the working day (between 8am and 3.30pm on any school day) by calling the School directly on 0208 958 6979 or by contacting the DSL directly on 07977 994441 or emailing rakshadave@hollandhouse.org.uk. Should an urgent safeguarding issue arise outside these times, parents and pupils are advised to seek external support or to contact emergency services as appropriate.

In the absence of the DSL, a deputy DSL should be contacted. The Deputy DSL is the Head and can be contacted on the School telephone number as above or by emailing head@hollandhouse.org.uk. The nominated School Governor with responsibility for Safeguarding and Child Protection is Mrs Safia Tharoo who can be contacted by email at safiatharoo@hollandhouse.org.uk

4. Providing a Safe Environment for Pupils and Staff

Every Pupil should feel safe and protected from any form of abuse which, in this policy, is detailed further in Section 6. The priority as a School is to provide all Pupils with a safe, secure and supportive environment in which they can learn, develop and have the best outcomes. To ensure an effective safeguarding culture, the School will take all reasonable measures to:

- Protect each child from any form of abuse, whether from an adult, another Pupil or any other young person
- Ensure that all staff and volunteers are alert to the signs of abuse both in the School and from outside
- Establish, maintain and promote an environment and ethos in which Pupils, the School staff and volunteers feel safe and secure, are encouraged to talk and are confident of being listened to when they have concerns about the safety and wellbeing of a child
- Ensure that children are aware of how to safely report concerns they may have about their own safety and wellbeing or that of others
- Include opportunities in the PSHE and RSE curricula, assemblies and elsewhere for children to develop the skills they need to recognise and stay safe from abuse, including appropriate education around family relationships, personal relationships, peer on peer abuse, emotional intelligence and resilience, accessing appropriate support, e-safety and radicalisation
- Work with Parents to build an understanding of the School's responsibility for the welfare of their children
- Provide sufficient support and guidance so that Pupils have a range of appropriate adults to whom they can talk if they experience difficulties
- Contribute to the prevention of abuse by ensuring that the provision of teaching helps Pupils to protect themselves and develops responsible attitudes to adult life and parenthood

- Deal sensitively and appropriately with every suspicion or disclosure of abuse
- Follow the local inter-agency procedures of the Safeguarding Partnerships (where a referral is made to another local safeguarding children's board their procedures and advice will be followed)
- Support a child who has previously been looked after and may now still be vulnerable; the DSL will inform the Head of relevant information in these circumstances. The Head will have the responsibility for the welfare and progress of looked after children and is trained for the role.
- The DSL will liaise with the child's Virtual School if they are in care or have previously been in care
- Support children who have been abused in accordance with their Child Protection Plan
- Support children in need of additional support, for example through CAMHS or other agencies, and their families in order to provide early intervention and help
- Provide guidance to Parents, children and staff about obtaining suitable support
- Work with other agencies to provide the best support for the Pupil and/or their Parents
- Design and operate procedures which promote this policy, including relevant child protection training for all staff
- Ensure that all staff are identifiable on the School site.
- Ensure that the DSL makes prompt contact with the police if a criminal offence is suspected taking context into account.

4.1 Medical, Health and Safety

The School will take all reasonable measures to:

- Be alert to the medical needs (and other possible needs) of children with medical conditions, whether physical or mental health issues
- Operate robust health and safety procedures
- Take practicable steps to ensure that School premises are secure
- Ensure all visitors sign in on arrival and out on departure and are escorted while on the School premises by a member of staff or appropriately vetted volunteer. All visitors are given a visitor badge which must be clearly displayed at all times
- Provide relevant and up to date medical and health and safety training.

5 Child Protection Training and Teaching

All staff (including volunteers in regulated activity) are given Level 1 Child Protection training every three years (which includes Prevent awareness, how to identify children at risk, and online safety) in line with the recommendations and advice of the Safeguarding Partnerships. The Head, and DSL, complete Level 3 Child Protection training every two years.

All staff receive informal annual training on how to be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime, gangs and county lines. 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, or signs of assault or unexpected 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. All staff receive informal safeguarding updates termly at INSET and weekly in staff meetings. During these meetings, staff are given safeguarding scenarios to work through and these are discussed.

All staff who work directly with children must read and confirm they have understood Part One of KCSIE (September 2021) and Annex B in order to fully understand and discharge their role and responsibility in terms of safeguarding children. Staff are also expected to read and understand this Safeguarding Policy, where the name and role of the DSL is detailed, in order to fulfil these responsibilities and to be able to respond to safeguarding concerns relating to Pupils or staff. Those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of the full version of the document.

New staff joining partway through the year will complete Child Protection training online and meet with the DSL or DDSL and be issued with a copy of the Safeguarding Policy.

Visiting music teachers (VMTs), PE coaches, supply staff and volunteers are given appropriate child protection training and as part of this are made aware of the School's child protection procedures and how to report any concerns.

All staff, supply staff and volunteers, as part of their induction are advised of the following documents:

- The School's Safeguarding Policy including the role and identity of the DSLs (this policy) which includes information on Children Missing in Education
- Information on Online safety
- KCSIE Part 1 and Annex B (September 2021)
- Behaviour, Rewards and Sanctions Policy

- The Code of Conduct for Staff which includes guidance on staff/pupil relationships and communications using social media
- Whistleblowing Policy
- Staff ICT Acceptable Use Policy.
- Anti-Bullying Policy
- Mental Health Policy

They will also have a briefing with the DSL/Deputy DSL.

All Governors of the School are required to complete relevant safeguarding training and updates.

6. Identifying and Recognising Signs of Abuse and Neglect

Staff training covers the types of abuse, neglect and other safeguarding issues or causes for concern and the signs and symptoms in greater detail; the main points are highlighted below.

6.1 Types of Abuse and Neglect

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. All staff, but especially the DSL should consider whether children are at risk of abuse or exploitation in situations outside their families (contextual safeguarding). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Types of abuse/neglect (as described in KCSIE (September 2021)):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused 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.

It is essential that **all** victims are reassured that they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting physical abuse, emotional abuse, sexual abuse or neglect. Nor should a victim, ever be made to feel ashamed for making a report.

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

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

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

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

care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition, abuse can also be as described in London Safeguarding Children Board Child Protection Procedures 5th Edition 2016.

Complex and Organised Abuse: may be defined as abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse. Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children being abused via the use of electronic devices, such as mobile phones, computers, games consoles etc which all access the internet and, in particular, social networking websites. Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children/young people to be the perpetrators of such harm, with or without adult abusers.

6.2 Signs of Abuse

6.2.1 Signs of possible Physical Abuse (Please see Appendix C for further detail)

Unexplained injuries, bruising, scalds, injuries on parts of the body where accidental injury is unlikely

- The child may be reluctant for you to contact Parents, they may flinch when approached or touched, they may be reluctant to change for PE, they may cover their legs and arms even when hot, they may exhibit behaviour which is unusual for them.

6.2.2 Signs of possible Emotional Abuse (Please see Appendix D for further detail)

Failure to grow or thrive, sudden speech disorders, delayed development

- Compulsive nervous behaviour, unwillingness to socialise, excessive fear of mistakes and excessive lack of confidence, reluctance to have their Parents contacted, excessive deference towards others, especially adults.

6.2.3 Signs of possible Sexual Abuse (Please see Appendix E for further detail)

- Pain, itching, bruising or bleeding in the genital or anal areas, STDs, recurrent urinary tract infections, stomach pain or discomfort when the child is sitting or walking
- Sudden and unexplained changes in behaviour, apparent fear of someone, self-harm, eating disorders or suicide attempts, sexualised behaviour inconsistent with the child's age, reluctance to change for PE, possession of unexplained amounts of money or gifts.

6.2.4 *Signs of possible Neglect* (Please see Appendix F for further detail)

- Being constantly hungry and sometimes stealing food, unkempt, loss of weight or constantly underweight, being dressed inappropriately for the weather conditions, untreated medical conditions
- Being tired all the time, frequently missing School or being late, unable to socialise, often left unsupervised.

6.3 Children with Special Educational Needs and Disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers (KCSIE (September 2021)).

At Holland House School we identify pupils who might need more support to be kept safe or to keep themselves safe by ensuring they have a greater availability of mentoring and extra pastoral support. Care plans are put in place where necessary.

The use of 'reasonable force' in schools

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young

person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active contact such as leading a pupil by the arm out of the classroom.

6.4 Other Specific Safeguarding Issues

All staff are made aware of, and alert to, other specific safeguarding issues, and given particular advice on these, by the DSL in the annual refresher training on CP matters. Further information can be obtained from the DSL.

Under the guidance of Children Missing in Education (September 2016), the School also has a duty to notify the local authority when a Student joins or leaves the School.

6.5 Child Missing from Education

Staff are aware that a Child Missing from Education is potentially a safeguarding concern and could be a sign of abuse or neglect, or of Child Sexual Exploitation (CSE) or Child Criminal Exploitation (CCE). Staff are alert to patterns of regular absence and will alert the DSL in line with other potential safeguarding concerns. In addition, the School, where reasonably possible, will hold at least two emergency contact numbers for each Pupil. The School has a duty to inform the local authority of any Pupil who fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 days or more. The School's attendance monitoring systems regularly highlight Pupils whose attendance falls below 95% to staff to ensure that attendance is closely monitored, and regular absence is followed up in the best interests of the child.

The School has an admission register and an attendance register. All pupils are placed on both registers as soon as they are admitted to the school. Parents are required to provide at least two emergency contacts for their child and update the school as soon as possible if the numbers change.

The School monitors attendance carefully and addresses poor or irregular attendance without delay. Should a child be absent from school and no explanation offered (i.e. no reason given via telephone, e-mail etc.), the School will attempt to contact the parent to ascertain the reason for the child's absence. Class teachers are aware of the requirement to use an absence code for any absence and will contact the Designated Safeguarding Lead should they have any cause for concern about a pupil's absence/attendance record.

The school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriages.
4. Procedures to inform the local authority when we plan to take off-roll when they:
 - a. Leave school to be home educated
 - b. Move away from the school's location
 - c. Remain medically unfit beyond compulsory school age
 - d. Are in custody for four months or more (and will not return to school afterwards); or
 - e. Are permanently excluded

The School will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, the School will record the name of the pupil's new school and their expected start date.

All staff are aware and alert to the signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

6.6 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines, and Serious Violence

Different forms of harm often overlap, and 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. 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. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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 drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It 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; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females

and other children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted that exploitation does not always involve physical or in-person contact; it can also be facilitated and/or take place online.

Indicators of child exploitation might include where children appear with unexplained gifts, money or new possessions, suffer from changes in emotional wellbeing, misuse drugs and alcohol, have older girlfriends or boyfriends, regularly come home late or regularly miss school.

'County lines' is a term used specifically to describe gangs and organised criminal networks involved in exporting illegal drugs locally or across the UK. Children can be exploited to move, store and sell drugs and money. There is often significant crossover with the techniques used by perpetrators of CSE/CCE and many of the indicators for these detailed above may also be applicable to children involved in county lines. Additionally, going missing and being found in areas away from their home, or being found in accommodation they have no connection with and being involved in the exchange of drugs or money for drugs, or in serious violence are also possible signs of involvement.

Both CSE and CCE can happen to any young person – whatever their background, age, gender, race or sexuality or wherever they live. CSE and CCE can be very difficult to identify. Warning signs can be easily mistaken for 'normal childhood behaviour'.

Indicators that signal children are at risk from or involved in serious violent crime include increased absence from school, changes in friendships or relationships with older individuals or groups, significant declines in performance, signs of self-harm or significant changes in wellbeing or signs of assault or unexplained injuries. Risk factors which increase the likelihood of involvement in serious violence include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

The School recognises that CSE and CCE are forms of abuse and understands its safeguarding duties and will strive to protect any pupil that it may consider at risk of CSE either presently or in the future. Should any member of staff suspect that a pupil is at risk of CSE, they will report their suspicions to the Designated Safeguarding Lead, who will respond with sensitivity and act in the best interest of the child to ensure their safety and prevent any future harm.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for

example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes that have witnesses. There exists an age appropriate guide for children aged 5-11 years old. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers and the school should direct parents to this if necessary.

Children with family members in prison

Approximately 200,000 children have a parent in prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professional working with offenders and their children, to help mitigate negative consequences for those children.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family member is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grand-parents or cousins.

Parents and private foster carers both have a mandatory duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Holland House School recognises its mandatory duty to report to the local authority where it is aware or suspects that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check they are aware of their duty to inform the Local Authority. The school itself has a duty to inform the Local Authority of the private fostering arrangements.

On admission to Holland House School, the school will take steps to verify the relationship of the adults to the child who is being registered.

6.7 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. If staff have a mental health concern, immediate action should be taken, following the child protection policy,

and communicating with the DSL. Staff should also refer to the School's Mental Health and Well-being Policy.

6.8 So-called Honour Based Abuse

So-called "honour based" abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

6.9 FGM Mandatory Reporting Duty (For further detail see Appendix G)

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police, where they discover (either through disclosure by the victim or by visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining Pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin/'at risk' country (especially before the summer holidays)
- Talk about a 'special' procedure or celebration to become a woman.

- Parents who wish to withdraw their children from learning about FGM

Symptoms of FGM:

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM, Staff should not assume that FGM only happens outside the UK.

Signs and behaviours which may indicate that a child has undergone FGM:

- A girl may talk about pain or discomfort between her legs
- Difficulty walking, sitting or standing and may even look uncomfortable
- Be particularly reluctant to undergo normal medication examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- Frequent urinary, menstrual or stomach problems
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from the classroom during the day with bladder or menstrual problems.

If any member of staff is approached by a child who wishes to tell them about abuse or a worry of this kind, they should:

- Take the concerns seriously and listen sympathetically;
- Do not offer confidentiality and explain that you may have to inform someone else;
- Do not ask leading questions;
- Do not make promises
- Hand-write the report, adding signature and the date;
- Immediately report to either DSLs or in their absence, the Headmistress.

If a member of staff discovers that an act of FGM appears to have been carried out, they should report the matter to the police.

6.10 Forced Marriage

Staff should report to the DSL any Pupil they believe to be vulnerable.

6.11 Preventing the Radicalisation of Children and Young People

The School takes its duty to protect Pupils from the risk of radicalisation very seriously. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism as defined under Section 26 of the Counter-Terrorism and Security Act 2015. This duty is known as the Prevent

duty. Under paragraph 7 of Prevent, extremism is defined as a “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces”.

The School aims to protect and safeguard Pupils at risk of radicalisation and staff are alert to, and assess the risk of, S being drawn into terrorism and extremist ideology. The School encourages healthy debate and discussion of issues at age appropriate levels and in various areas, not just PSHE, and promotes a tolerant, respectful culture across the School. The School’s Bi-weekly assemblies are an example of this. Staff use their professional judgment to identify Pupils who might be at risk of radicalisation and who may be in need of help or protection. If a member of staff has concerns over a Pupil at risk they will share that with the DSL who will refer the issue to the local Children’s Social Care/Safeguarding Partnerships and the local Prevent Coordinator and/or Channel Panel, a programme focussing on early support for a child or young person identified as being vulnerable to being drawn into terrorism or radicalisation.

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

The school recognises its duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism and forms of extremism. The school builds pupils’ resilience to radicalisation (the process by which people come to support terrorism and the forms of extremism leading to terrorism) by promoting fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, and enabling them to challenge extremist views. This is done in an age appropriate way and takes place in Assemblies, through discussions in class groups and through open debate and learning about values in the classroom.

The school’s Senior Leadership Team has conducted a risk assessment regarding radicalisation, and the school maintains awareness of the importance of promoting values through the curriculum and other elements of school life, has built awareness of radicalisation into IT policies.

The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Holland House School ensures that suitable filtering is in place through its ICT provider (currently STORM-IT).

Internet safety is integral to the School's ICT curriculum and is also embedded in PSHE and RSE.

As with other online risks of harm, every teacher needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

All staff receive a briefing on Prevent at Inset and are directed to KCSiE September 2021 for further guidance.

The School uses the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. The School is committed to ensuring that its pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or Deputy) making a Prevent referral.

Recognising Extremism

Staff should be aware of the following early indicators which may be signs of radicalisation or extremism:

- expression of views by a child or the child's family members which suggest that a child may be susceptible or exposed to a terrorist ideology
- showing sympathy for extremist causes
- advocating messages similar to illegal organisations or other extremist groups
- advocating violence towards others
- changes in children's behaviour which could indicate that they may be in need of help or protection

- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- seeking to hide their views
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

If staff have concerns about children's vulnerability to radicalisation or if they are concerned that children and young people are developing extremist views or showing signs of becoming radicalised, they should report this to the DSL as with other safeguarding concerns.

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A member of the SLT may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at: [Channel guidance](#).

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they

consider all the other factors relevant to how they carry out their usual functions. “Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals. The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty

6.12 Online Safety and mobile phones

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual share of indecent images, especially around group chats, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or deputy DSL.

The breadth of issues classified within online safety can be categorised into four areas of risk:

- Content (being exposed to illegal or harmful content, e.g. pornography, racism, fake news or extremism)
- Contact (being subjected to harmful online interaction e.g. adults posing as children)
- Conduct (personal online harm e.g. the sharing of nudes or sending/receiving explicit images)

- Commerce (risks such as gambling or financial scams).

Measures are in place for appropriate online filters and monitoring systems to help ensure the online safety of Pupils whilst at School. The School aims to work in close partnership with Parents to ensure that children enjoy the freedom ICT brings whilst also understanding and knowing how to keep themselves safe. The safeguarding training that Staff receive also involves online safety training.

Within the ICT and PSHE curriculums, Pupils are taught a range of topics which include keeping safe on-line.

Pupils are not allowed mobile phones **in** school. Children who walk to and from school are permitted to have mobile phones with them on route to and from school. On arrival at school the mobile phone or smart watch must be handed in to staff on gate duty and from them before exiting the School gate at the end of the day.

In the event that a pupil is found to be in possession of a mobile phone or other electronic device, staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

- Cause harm,
- Disrupt teaching,
- Break school rules,
- Commit an offence,
- Cause personal injury, or
- Damage property.

Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including pornographic images of children, without deleting them.

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's behaviour policy.

Sanctions:

- Mobile phones are confiscated from pupils. These are handed in to the School Office from where parents may recover them;
- Additional sanctions may be applied if appropriate.

6.13 Bullying

The School has an Anti-Bullying Policy. A bullying incident will be treated as a child protection concern if there is reasonable cause to believe the child is suffering or likely to suffer significant harm. No one person works on their own when dealing with a bullying incident and the threshold for referral is discussed in all cases. Details of cases are reported to Governors at the Annual Child Protection review. The School maintains a bullying register.

6.14 Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Experiencing or witnessing domestic abuse can have a serious, long lasting emotional and psychological effect on children and they may sometimes blame themselves for the abuse.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

6.15 Specific Safeguarding Issues

Behaviours linked to issues such as drug taking, misuse of alcohol, deliberately missing education, and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, can be signs that children are at risk. With regards to the latter, we follow the guidance provided by the UK Council for Internet Safety (UKCIS) published in December 2020: 'Sharing nudes and semi-nudes'. Other safeguarding issues all staff should be aware of are listed below. Further information is to be found in Annex B of KCSIE.

6.16 Peer on Peer Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) and that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. All staff should understand that even if there are no reports of peer on peer abuse in the School, it does not mean it is not happening, it may be the case that it is just not being reported. Staff are aware of the important role they have to play in preventing it and responding where they believe a child may be at risk from it. It is more likely that girls will be victims and boys perpetrators but all peer on peer abuse is unacceptable and will be taken seriously.

If a member of staff has any reason to believe that peer on peer abuse may have occurred, they must speak to the DSL (or a deputy) immediately. It is essential that all staff challenge inappropriate behaviours between peers, such as those listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudiced-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; (this may involve an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault: (this may involve an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip or to engage in sexual activity with a third party
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- Consensual and non-consensual sharing of nudes or semi-nudes and / or videos (also known as sexting or youth produced sexual imagery)
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element especially around chat groups, and sharing of abusive images and pornography).

The School's Pupil Behaviour Policy and Anti-bullying Policy make clear the expectations on pupils of acceptable behaviour towards other pupils and the actions that will be taken when behaviour falls short of expectations, pupils will be dealt with in accordance with the behaviour levels contains in 'The School's Pupil Behaviour Policy'. When there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm, staff **must** report the peer on peer incident to the DSL. Such incidents are addressed as Child Protection concerns and the DSL will take advice from Local Authority Children's Social Care. All children involved will be treated as being 'at risk'. Staff must seek advice from the DSL if they are in any doubt about whether a child is suffering, or is likely to suffer, significant harm. A record of the behaviour will be kept on a behaviour log by the Head and any behaviour of a sexual nature or the potential for becoming so, will be kept on a sexual harassment log, by the DSL. Both the perpetrator, victim and any other affected children, will be given individual support by the Pastoral Lead or in their absence, the Head, by way of one-to-one discussions.

The School will minimise the risk of Peer-on-Peer abuse by addressing such issues through Assemblies and during PSHE and Relationships lessons. Teachers hold 1-2-1 sessions with each child, at least once a term during which the teacher and child have the opportunity to discuss welfare and friendships. The children are made aware of the PANTS rule (Private are privates, Always remember your body belongs to you, No means no, Talk about secrets that upset you, Speak up, someone can help). From EYFS onwards, children are reminded that they must not touch another child without their consent. This is explained to very young children through role play and educational videos. The children are regularly reminded through these channels that they can speak with any

member of staff in confidence. They are told that their concerns will be treated seriously and they will be listened to.

Sharing nudes and semi-nudes

In cases of sharing nude and semi-nude images (previously known as sexting) the UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and Semi-nudes (December 2020) is to be followed. There is no universal definition, but this guidance says, 'The sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, cat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline.' The guidance only applies to images created or shared by young people under the age of 18. The guidance does **not** apply to:

- Images of under-18s created by adults (refer to police)
- Under-18s sharing adult pornography
- Exchanging text-only sexual content

If handled poorly, an unsafe and unhealthy set of norms can be created which enable peer-on-peer abuse and this can also prevent other children and young people from disclosing.

In respect of Indecent images of children (under 18s; including images of self) making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal.

Indecent imagery does not always mean nudity, however images are likely to be defined as such if they meet one or more of the following criteria:

- Nude or semi-nude sexual posing
- Someone nude or semi-nude touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting someone else sexually
- Sexual activity that includes animals

Children and young people who share nudes and semi-nudes of themselves, or peers, are breaking the law. However, children and young people should not be unnecessarily criminalised. Whilst children and young people creating and sharing images can be risky, it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful' to all children and young people. The police have made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children. In many cases, the school may respond to incidents without involving the police, for example where an incident can be defined as 'experimental'. Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub (MASH). Even when the police are involved, a criminal justice response and formal sanction against a child or young person would only be considered in exceptional circumstances.

Youth Produced Sexual Images

Aggravated incidents:

- Incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes
- Adult involved (The images may be solicited by adult offenders – Report to police)
- Youth only – intent to harm: these can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
- Youth only – reckless misuse; no intent to harm but the images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

Experimental Incidents:

- Incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.
- Romantic – Incidents in which young people in ongoing relationships make images for themselves or each other to share only between themselves.
- Sexual attention seeking – it is important to note that incidents within this category can be part of normal childhood. A child or young person should not be blamed for taking and sharing their image.

- Other – cases that do not appear to have aggravating elements, but also do not fit into these Romantic or Attention Seeking sub-types. These involve either young people taking pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

What staff should do:

- Report to the DSL immediately.
- 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 report this to the DSL and seek support. (e.g. if a young person has showed it to you before you could ask them not to).
- 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.
- Do not share information about the incident with other members of staff, the young person(s) it involves their parents and/or carers or others.
- 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.

Initial response

The incident should be reported to the DSL immediately, who will then hold initial review meetings with relevant staff and if appropriate, interview the children involved. Parents/Carers should be informed at an early stage, unless this puts the child/children at risk of harm. A referral must be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

Questions to consider

- Do you have any concerns about the young person's vulnerability?
- Why were the nudes and semi-nudes shared? Was the young person put under pressure or coerced or was consent freely given?
- Have the nudes and semi-nudes been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the images?

- Have the nude and semi-nudes been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the images?
- How old is the young person or young people involved?
- Did the young person send nudes and semi-nudes to more than one person?
- Does the young person understand the possible implications of sharing the nudes and semi-nudes?
- Are there additional concerns if the parents or carers are informed?

The DSLs must not intentionally view any nudes and semi-nudes images unless there is a good and clear reason to do so and requires delegated authority from the Head and the reasons for viewing the images must be recorded. The images should only be viewed in the following circumstances:

- To establish facts because it is not possible to do so from the young person.
- To report to a website, app or suitable reporting agency (such as the Internet watch Foundation - IWF) to have it taken down, or to support the child or young person or parent or 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 education setting's device or network.

Should the images be deleted?

If the School has decided that other agencies do not need to be involved, consideration should be given to deleting nudes and semi-nudes from devices and online services. In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. If the young person refuses to delete or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved. In considering harmful sexual behaviour, refusal or failure to delete would increase risk of further harm.

If the image is not to be deleted, any device that needs to be taken and passed onto the police, must be confiscated and the police called. Disconnect the Wi-Fi and data, immediately turning the device off to avoid the imagery being removed from the device remotely through a cloud storage service. Place the device in a secure place (e.g. locked cupboard or safe) until the police are able to come and collect it.

The sharing of sexual imagery of children under the age of 18 by adults constitutes child sex abuse and such cases would always be referred to the Police.

Sexual violence and sexual harassment between children in schools and colleges (for further detail please see Appendix H)

Sexual violence and sexual harassment can occur between two children of **any age and sex** from primary through to secondary and into colleges. It can occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

See Annex B of KCSIE for further information about sexual harassment and sexual violence, including definitions.

6.16.1 Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2021))

- Pupils may make a report via their Form Teacher/ Head/ School Nurse/ DSL or any teacher they feel comfortable talking to.
- The School's initial response to a report from a child is important. It is essential that ALL victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor should they ever be made to feel ashamed for making a report.
- All staff are trained as part of the annual child protection and safeguarding training how to raise a concern with the DSL.
- If there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm', a referral will be made to appropriate external agencies.

6.16.2 Action following a Report of Sexual Violence and Sexual Harassment

- Immediate consideration should be given as to how to best support and protect the victim and the alleged perpetrator (and any other children involved/impacted)
- The starting point regarding any report is the School's zero-tolerance approach to any sexual harassment, violence or abuse. Staff will be especially careful not to normalise or allow any implication that such behaviour can be dismissed as 'banter', 'boys being boys' or 'children being children'. The School will carefully consider any report of sexual violence and/or sexual harassment. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the School's initial response.

- The DSL will take into account the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.
- The DSL will take into account the ages and developmental stages of the children involved and the nature of the alleged incident(s) including whether a crime may have been committed and consideration of harmful sexual behaviour.
- The DSL will take into account any power imbalance between the children e.g. is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- The DSL will consider if the alleged incident is a one-off or a sustained pattern of abuse and consider if there are any ongoing risks to the victim, other children or the School staff and also consider other related issues and wider context in line with contextual safeguarding.

6.16.3 Options to Manage the Report

Every report will be considered on a case by case basis. There are four likely options to consider when making a report:

1. Manage internally – if the DSL considers that the child concerned is not in need of early help or statutory intervention then it may be appropriate to handle the incident internally through utilising the School's behaviour and bullying policies and providing pastoral support. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.
2. Early help – this means providing support as soon as a problem emerges and can be particularly helpful to address non-violent harmful sexual behaviour and may prevent escalation to sexual violence. Multi-agency early help will work best alongside the School's policies and engagement with Parents. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.
3. Referrals to children's social care – where a child has been harmed, is at risk of harm, or is in immediate danger the DSL will make a referral to the local children's social care. Unless there is a compelling reason not to, the DSL will inform the Parents. The School will not wait for the outcome of the social care investigation before protecting the victim and other children but will work alongside and co-operate with the relevant lead social worker to ensure the best support possible is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support. If the social care's review of the evidence means they do not believe statutory intervention is

relevant, but the DSL is still concerned for the safety of the child, the DSL should be prepared to refer again. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.

4. Reporting to the police – any report to the police regarding a student aged under 18 will generally be in parallel with a referral to children’s social care. The DSL (and deputy) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made the DSL must pass this on to the police, even if the alleged perpetrator is under ten years old. Unless there are compelling reasons, the School will inform the Parents. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.

Where there is a safeguarding concern, School leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take. No matter what course of action is followed, the School will endeavour to provide support within its own pastoral structures, as well as helping signpost the student(s) to external sources of support where appropriate

6.16.4 Ongoing Response for the Victim

- The School will consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim will be paramount. Wherever possible, the victim should be supported to continue in their normal school routine.
- Victims may not disclose the whole picture immediately but provide information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. The victim will find it helpful to have a designated trusted adult to talk to and the School will respect this choice
- If the victim finds it difficult to maintain a full timetable, allowances will be made and a physical space to which the Student can withdraw will, where appropriate and possible, be provided
- The School will do everything it reasonably can to protect the victim from bullying or harassment as a result of any report they have made and provide ongoing support if necessary, continuing to work with social care and other agencies as required
- Efforts will be made to remove the perpetrator from classes they share with the victim and to keep them apart, for example on transport. These actions are in the best interests of the

children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator

- If the victim moves to another educational institution the School will make them aware of any ongoing support needed; the DSL will ensure this happens, discussing with the victim and their Parents if appropriate. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

6.16.5 Ongoing Response for the Alleged Perpetrator

- The School will be mindful of the difficult balancing act of safeguarding the victim and providing the alleged perpetrator with an education and safeguarding support as appropriate and implementing any disciplinary sanctions
- The School will consider the age and developmental stage of the alleged perpetrator, and the nature of the allegations
- The School will consider the proportionality of the response and support and sanctions should be considered on a case-by-case basis
- The School will be mindful that, as well as potentially posing a risk of harm to other children, there is a possibility that the alleged perpetrator may have unmet needs. Their own harmful sexual behaviour may be a symptom of either their own abuse or exposure to abusive practices and/or materials. The School may take advice, as appropriate, from children's social care, specialist sexual violence services and the police
- If the alleged perpetrator moves to another educational institution, the DSL must make them aware of any ongoing support needs and where appropriate, potential risk to other children and staff. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

6.16.6 Helpful Contacts

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) – emotional and practical support for victims of sexual violence accessed via Rape Crisis and The Survivors Trust
- CAMHS – child and adolescent mental health services
- Rape Crisis Centre – therapeutic support for children who have experienced sexual violence.
- Internet Watch foundation – potentially removes illegal images.
- Childline Report Remove Tool: Remove a Nude Image Shared Online
- UKCIS Guidance on Nudes and Semi-Nudes

6.17 Signs of Abuse or where Safeguarding Concerns should be Raised

Possible signs or indicators of abuse include (but are not limited to):

- Disclosure of abuse or any comment which gives rise to that inference
- There is no reasonable or consistent explanation for a Student's injury; the injury is unusual in kind or location; there are a number of injuries or a pattern to them
- The Pupil's behaviour changes suddenly, or their behaviour stands out as being extremely challenging behaviour or possibly extreme model behaviour
- The Pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- The Pupil's development is delayed
- The Pupil loses or gains weight
- Self-harming behaviour, including cutting and drug and alcohol abuse
- The Pupil uses inappropriate sexual language
- The Pupil displays a high level of anxiety
- The Pupil isolates themselves and becomes withdrawn
- The Pupil appears neglected, for example, hungry or inadequately clothed
- The Pupil is reluctant to go home, or has been openly rejected by Parents
- The Pupil's friendship circle in or out of the School changes significantly and/or suddenly.

7. Reporting Concerns

All pupils at the School are made aware of the opportunities they have to express their concerns:

- through speaking to Form Teachers, welfare staff, the Head or the Deputy
- Independent Helplines.
- Posters around the school list the Childline contact number.

All staff are aware that there are times when a child must be given the opportunity to be listened to. Any member of staff may become aware of a child in distress or suspicious that a child may have been maltreated. The abuse or suspected abuse may have taken place at home, school or elsewhere. It may involve parents, relations, staff, other adults or pupils. The welfare of the child at risk is the first priority. Staff are trained to use the TED (Tell me... Explain... Describe...) questioning technique.

Early help is recognised as essential in any situation where there are concerns about a child. This will mean that the school will seek to provide support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss the need for early help with the DSL. Early help may involve support from the class teacher or personal tutor or from another member of the staff who is able to offer suitable pastoral counselling; judgment as to the member of staff with

whom a particular child is likely to be most open will be exercised. The engagement of parents at this stage will also be considered.

All staff (including supply staff and volunteers) have a professional duty to take immediate action on suspicions of abuse or reported allegations of abuse concerning Pupils. They also have a professional duty to report wider concerns about Pupils so that prompt action and early intervention can be taken to ensure they have the best outcomes. Staff should not assume a colleague will take action or share information that might be critical in keeping children safe.

Every report, disclosure or suspicion of abuse from within or outside the School will be taken seriously. Staff are aware, from training and from their reading of KCSIE (September 2021) that concerns raised by a child should be raised immediately with the Designated Safeguarding Lead, who will make a referral to children's social care. The DSL will offer advice to staff reporting concerns and keep the Head informed of all actions. If the allegation involves a staff member including the DSL, supply staff, contractors and volunteers, this should be reported directly to the Head. If the Head is the subject of the complaint, this should be reported should directly to the Chair of Governors, Mr Richard May via richardmay@hollandhouse.org.uk. Concerns should be raised using either the concerns forms located in the staffroom or on a piece of paper to hand, with the date and time of the disclosure or cause for concern noted, and naming others present so that accurate records are maintained. Should a child be at risk of immediate harm, the staff member should also see the DSL or deputy in person without delay. Staff are aware of the need to respond immediately and to record accurately as records may be required to be disclosed in possible court proceedings. Any potential evidence must be safeguarded and preserved (for example, scribbled notes, mobile phones containing messages or screenshots of online evidence, clothing, and computers). All staff are aware that confidentiality must not be promised and that leading, or closed-type questions, must not be asked. If a child makes a disclosure staff must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Any discussions will be handled with tact and sympathy and staff are made aware that the way in which they talk to a child may affect the evidence if the matter proceeds to court. The child will be reassured that they have done the right thing in coming forward and that information will only be shared with those who need to know.

If any member of staff is approached by a child who wishes to tell them about abuse or a worry of this kind, they should:

- Take the concerns seriously and listen sympathetically;
- Do not offer confidentiality and explain that you may have to inform someone else;
- Do not ask leading questions;

- Do not make promises
- Hand-write the report, adding signature and the date;

Immediately report to either DSLs or in their absence, the Head.

Staff should be aware of the issues in regard to mental health which may show themselves in anxiety, eating disorders, concerns over body image and self-harm.

Staff should be particularly alert to pupils' relationships with each other and the potential for peer abuse across the rest of the school. Staff should also note that children with SEN and disabilities are more likely to be abused or neglected and should be especially alert to the well-being of these pupils.

Staff are to report any Safeguarding concerns about a child as a 'record of concern' to the DSL or DDSL. 'Record of Concern' forms can be found on the notice board in the staffroom.

7.1 Options for Action

The DSL will take into consideration contextual safeguarding which means assessments of Pupils will consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

The DSL might co-ordinate or initiate further support or early help for the child and the family via an inter-agency assessment or perhaps working with the child's General Practitioner (GP) in order to prevent needs escalating to the point where intervention might be needed by children's services.

The DSL might seek advice from the Safeguarding Partnerships using, for example, the (MASH) Team on 020 8359 4066. This is a Barnet Multi-Agency Team providing a safeguarding consultation to practitioners with advice and guidance when the threshold for referral might not be met or the safeguarding needs of the child are unclear. It is not anonymous, and the DSL will share information about the Pupil, including their name. The DSL is under an obligation to act on advice given by this service, or that provided by another local Safeguarding Partnership.

This might be followed by a CAF (Common Assessment Framework) or a TAC (Team Around the Child) in order to assess a child's needs with other agencies and to co-ordinate support in the School and/or with external agencies. The school follows the procedures of the London Borough of Barnet. The School will listen to the views of the child and the DSL will take these views into account in their decision-making. There may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a Pupil's wishes. The DSL and all staff will always act in the best interest of the child.

If, at any point, there is a risk of immediate serious harm to a child a referral will be made to children's social care immediately (see contact numbers). The Parents will be informed about the need to refer whenever possible, except where, in doing so, the School would expose the child to further risk. The School is not required to gain the consent of Parents before referring an incident to the Designated Officer.

It is important to note that in exceptional circumstances where a DSL or Deputy DSL is not available, this should not delay appropriate action taking place and any staff member can refer their concerns directly to the relevant children's social care department. The local authority should make a decision within one working day of a referral being made about the type of response that is required and should let the referrer know the outcome.

Contact details for Barnet and other local authorities can be found at the end of this policy. There is a flow chart outlining this process in KCSIE (September 2021).

7.2 Data Protection

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

8 Allegations

8.1 Guidelines for Allegations against Teachers, Support Staff or Volunteers

The School will take all reasonable measures to design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations (referring to Part Four of KCSIE (September 2021) which looks at allegations of abuse made against teachers and other staff).

The School has procedures for dealing with allegations against staff and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures, to be found in Appendix B, follow the guidance in KCSIE (September 2021) (Part Four: Allegations of abuse made against teachers and other staff).

Allegations of abuse, or anyone who becomes aware of such an allegation, against a member of staff or volunteer will be referred to the Head or in her absence the Chair of Governors', who will contact the Designated Officer, Barnet, promptly and within one working day, without any prior investigation undertaken by the School. Any doubts or concerns over an allegation of abuse against a member of staff or apparently borderline cases can be discussed informally with the Designated Officer.

Where appropriate the Head may consult with the DSL before reporting to the Designated Officer, unless the allegation is against the DSL in which case the Head will go straight to the Designated Officer. The accused person will be informed as soon as possible after the Designated Officer has been consulted. Appropriate support will be provided, and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate. The School would seek suitable legal advice as to due process and appropriate procedure.

Where an allegation is made against the Head, the person receiving the allegation should immediately inform the Chair of Governors or nominated governor, without first notifying the Head. Similarly, any allegation made against the Chair of Governors should be made to the Head. Any such allegations will be discussed with the Designated Officer before any further action is taken. In the case of serious harm, the police should be informed from the outset.

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. The school will ensure that any such allegation is dealt with properly, and in no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without find out the facts and liaising with the local authority to determine a suitable outcome. The School will fully involve agencies in any enquiries from the Designated Officer, police and/or children's services, but understands that, as the organisation with direct access to Pupils and other School staff, it is likely that it will usually take the lead in any investigation involving a supply teacher.

Suspension will not be an automatic response to an allegation. The School has a duty of care to its employees and will offer appropriate advice when allegations are made and following guidance in KCSIE (September 2021) (Part Four: Allegations of abuse made against teachers and other staff). The Designated Officer will be consulted as to the appropriate action to take and full consideration given to all the options, subject to the need to ensure:

- The safety and welfare of the Pupils or Pupil concerned.

- The need for a full and fair investigation.

Where an allegation by a Pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's Behaviour, Rewards and Sanctions Policy.

Where Parents have made a deliberately invented or malicious allegation the Head will consider (in accordance with the School's terms and conditions) whether to require Parents to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably. The School reserves the right to contact the police to determine whether any action might be appropriate, whether or not the person making the allegation is a Student or Parents.

Staff are given clear and detailed guidance in the Code of Conduct for Staff on ensuring their behaviour or actions do not place them at risk of harm or of allegations of harming a Student.

If the School ceases to use the services of a member of staff (or governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS). Any such incident will be followed by a review of the safeguarding procedures in the School, with a report presented to governors without delay. Where a member of staff resigns and there are child protection concerns this will also be reported to the DBS. The School will inform the Teaching Regulation Agency (TRA) in both such cases.

Where the School becomes aware of an allegation against a former member of staff the School will seek advice and guidance from the Designated Officer and/or the police.

For low level concerns about staff, for example where an adult behaves in a way which is inconsistent with the School's Code of Conduct or causes concern, even if they don't meet the harms threshold for the referral to the local authority, this must be reported to the Head or to the Chair of Governors' if the concern relates to the Head. The report should be recorded and dealt with proportionately and appropriately. Such examples might include but are not limited to staff being over-friendly with children, having favourites, taking photographs of Pupils on personal mobiles or using inappropriate sexualised language. Where there is a conflict of interest in reporting the matter to the Head, the report can be made to the Designated Officer directly.

For complaints or concerns about a contractor, the matter will be reported to the Head who will then direct the complaint to follow the external provider's own complaints procedure.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

The Head will decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Designated Officer.

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

If the concern has been raised via a third party, the Head should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- To the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they could consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- Name of individual sharing their concerns. (If the individual wishes to remain anonymous then that should be respected as far as reasonably possible)
- Details of the concern
- Context in which the concern arose
- Action taken

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The School will decide how long to retain such information for, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the Designated Officer.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

8.2 Whistleblowing

The School has a Whistleblowing Policy which can be found on the School Website and a copy can be obtained upon request from the School Office. What follows is a brief summary of the Whistleblowing Policy.

The school's Whistle Blowing Policy makes it clear that it is the duty of employees and volunteers to report any concerns or allegations about behaviour of colleagues or practices which are likely to put children at risk of abuse or serious harm. The report should be made to the Head, or the Chair of the Governors in their absence. There will be no retribution or disciplinary action taken against a member of staff for making a report, provided that it is done in good faith.

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health and safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed

The whistle blower is guaranteed confidentiality until, or if, the police are informed. Where a member of staff feels unable to raise a whistleblowing issue within school or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them including the NSPCC whistleblowing helpline (0808 800 5000).

8.3 Guidelines for Allegations by one Student Against Another

A Pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation process and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from the relevant children's social care and/or the police on the investigation of such allegations and take all appropriate action to ensure the safety and welfare of

all Pupils involved including the Pupil or Pupils accused of abuse. If it is necessary for a Pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant children's social care, Parents are informed as soon as possible and that the Pupil is supported during the interview by an adult.

9 The Appointment of Staff and the Recruitment of Volunteers

The School recruits all staff and governors in accordance with the Recruitment, Selection and Disclosure Policy. The School will take all reasonable measures to:

- Ensure that it practises safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with KCSIE (September 2021) (Part Three: Safer Recruitment – recruitment, selection and pre-employment vetting).
- Ensure that it carries out all necessary checks on the suitability of people who serve on the governing body in accordance with paragraph 237 and 241 of KCSIE (September 2021) (Part Three: Safer Recruitment – Secretary of State Section 128 Direction)
- Ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or Pupil) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) and TRA where appropriate
- Ensure that where staff from another organisation are working with the Pupils on another site, it receives assurances that appropriate child protection checks, and procedures apply to those staff
- Ensure that any visiting speaker, whether invited by staff or Pupils, has been suitably vetted in accordance with the Prevent statutory guidance
- Ensure that sufficient relevant staff are trained in safer recruitment processes and at least one member of all interview panels are safer recruitment trained.

Volunteer Risk Assessments

The School has a policy that under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis, teach or look after children regularly, or provide personal care on a one-off basis in the School, are deemed to be in regulated activity. The School

will obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in any regulated activity.

The School follows Government guidelines and considers that there are certain circumstances where it may obtain an enhanced DBS certificate (not including barred list information), for volunteers who are not engaging in regulated activity. This is set out in DBS workforce guides, which can be found on [GOV.UK](https://www.gov.uk).

The School undertakes a risk assessment and uses its professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so, Holland House School considers:

- The nature of the work with children;
- What Holland House School knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- Whether the role is eligible for an enhanced DBS check; and

Details of the risk assessment are recorded.

In making these decisions, where an individual is supervised, to help determine the appropriate level of supervision, the School has regard to the statutory guidance issued by the Secretary of State which requires that, for a person to be considered supervised, the supervision must be:

- By a person who is in regulated activity
- Regular and day to day; and
- “reasonable in all the circumstances to ensure the protection of children”

Alternative provisions

Holland House School is responsible for the safeguarding of its pupils when they are placed in an alternative provision. Holland House School obtains a written statement from any provider that they have completed all vetting and barring checks that are necessary on our staff.

10 The EYFS (Early Years Foundation Setting) for when Reception starts

The practitioner responsible for safeguarding in the Early Years setting is Mrs Raksha Dave, DSL who is a member of the Senior Leadership Team (SLT).

In the EYFS setting, only a camera or mobile device belonging to the School may be used to capture images. Pictures or moving images taken of the Pupils in the setting on the camera should be downloaded onto the School's secure network only. Pictures on the camera or mobile device are deleted from it immediately on downloading. Photographs of the Pupils that are printed out are used in the School setting only or on promotional material unless consent is withdrawn by Parents in writing. Staff, Parents, visitors and Pupils in the setting may not take photographs on their own cameras, mobile phones or other devices at any School event.

The use of personal mobile phones in the setting to send or receive messages and phone calls by any member of staff, Parents, visitors or Pupils is also not permitted while the children are in the setting. When Pupils in the EYFS setting go on a School trip, only the School camera may be used to capture images of them. Any volunteer helpers on the trip are made aware of this requirement before the trip commences. Photographs taken on the trip on the School camera are downloaded onto the School's secure network only and deleted from the camera at the same time.

11 Confidentiality and Information Sharing/Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should include a clear, comprehensive summary of the concern, details of how the concern was followed up and a note of any action taken, decisions reached and the outcome.

The School (the DSL) will keep all child protection records confidential and secure, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under the statutory requirements of The Children Act 1989.

In accordance with Working Together to Safeguard Children (July 2018) the School recognises that effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision. While Pupil consent to share information will in all normal circumstances be sought, the School recognises that fears about sharing information cannot

be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The child's views will be taken into account where possible, but the DSL and the Head will discuss each case where information might need to be shared with another agency and, if necessary, refer to Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (2015) or seek legal advice.

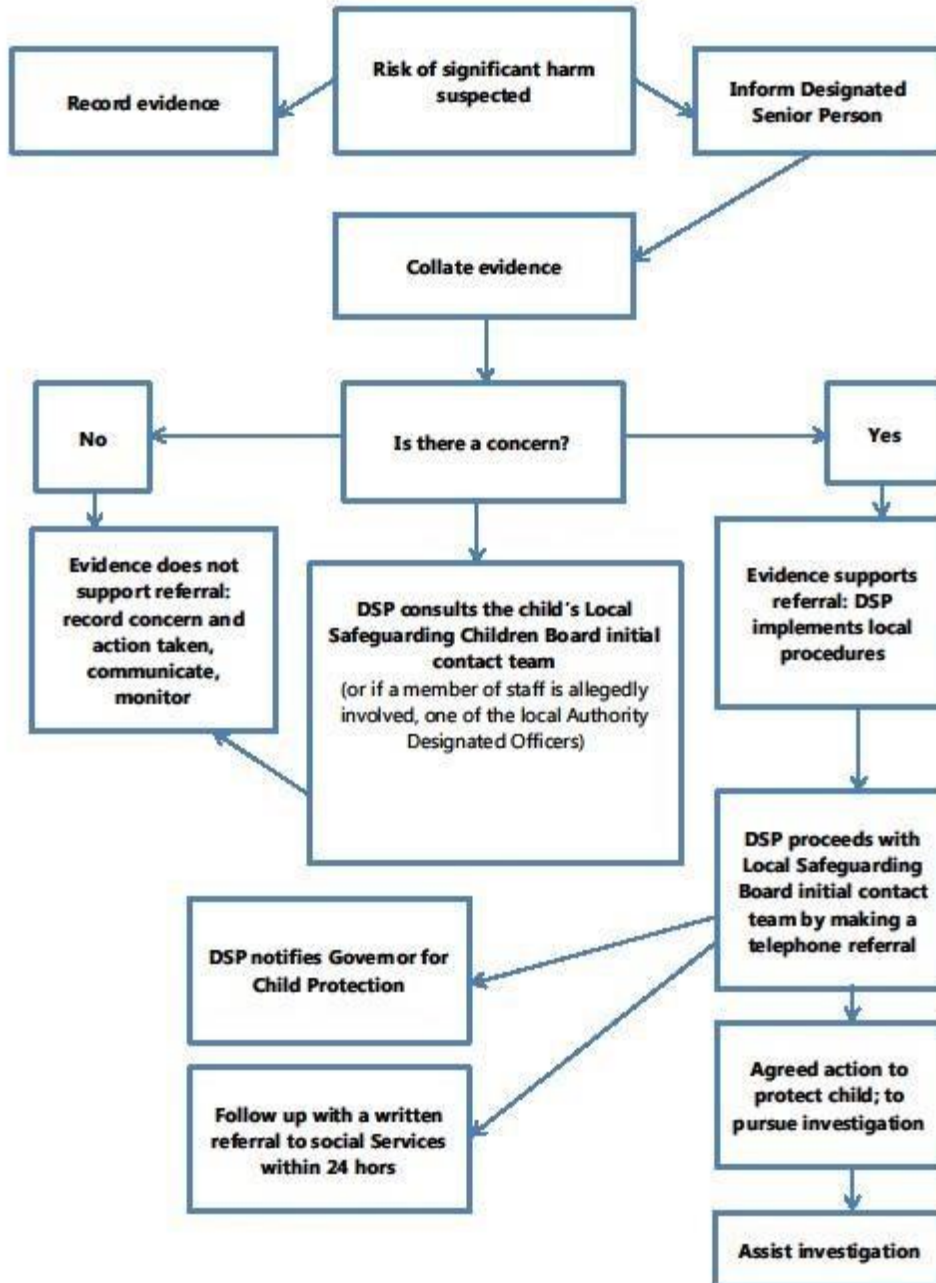
In line with its obligations the School will pass on child protection records when a child or young person changes School. These will be sent confidentially and using a "signed for" delivery service/confirmation of receipt obtained. A copy may be kept until safe delivery at the new School and the copy will then be destroyed. Reasonable steps will be taken to ensure similar records are obtained from feeder schools and EYFS providers. When the School is unsure of the Student's next educational setting, it will fulfil its duty to inform the Local Authority that the Student may be missing in education. The School will also pass on information verbally to the child's new school so that they can support a pupil from the instant he/she starts at their new school.

12 Contact Numbers

London Borough of Barnet contact details:

- London Borough of Barnet Emergency Duty Team– 020 8359 2000
- MASH Team – 020 8359 4066 N.B. The Multi Agency Support Hub (MASH)/Children's Service Referral and Assessment is a single point of referral for all agencies or the general public in relation to care and welfare concerns about children.
- Designated Officer – Shrimatie Bissessar – 020 8359 4066
This is our first port of call for questions, queries and advice regarding Safeguarding and our children.
- Barnet Safeguarding Children Partnership (BarnetSCP) – Chris Miller (Independent Chair) – 020 8359 4519 – barnetscb@barnet.gov.uk **Prevent contact details:**
- Prevent coordinator – Ben Taylor – 020 8359 2995 OR 07921 277713 – ben.taylor@barnet.gov.uk or ben.taylor@barnet.gcsx.gov.uk (for personal and/or sensitive information about a person)
- N.B. Channel referrals should be sent to the MASH Team and/or advice sought from the Prevent coordinator
- Anti-Terrorism Hotline – 0800 789 321 **General contact details:**
- London Child Protection Procedures – www.londonscp.gov.uk
- Local Police Child Protection Team – Call 101 – <http://content.met.police.uk/Borough/Barnet/Contact>
- N.B. In an emergency, please call 999
- NSPCC (Worried about a child contact number) – 0808 800 5000 – help@nspcc.org.uk
- NSPCC Whistleblowing Helpline – 0800 028 0285 – help@nspcc.org.uk
- The Samaritans – 116 123 – jo@samaritans.org
- Childline UK – 0800 11 11 11
- Barnardo's – 0808 800 5000
- Child Exploitation and Online Protection Centre (CEOP) – 0370 496 7622 (available 24/7) OR 0870 000 3344 – communication@nca.x.gsi.gov.uk

Diagrammatic Representation of the School's Internal Procedures



Appendix A - Roles of the Designated Safeguarding Lead (DSL) and Safeguarding Governor

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy Designated Safeguarding Leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

1.Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

2. Manage Referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

3. Working with Others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the Designated Officer(s) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;

- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

4. Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSiE 2021.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

5. Raise Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

6. Training, Knowledge and Skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-

bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

7. Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

8. Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

9. Holding and Sharing Information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSiE 2021, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

10. The Role of the Designated Safeguarding Governor

The Safeguarding Governor:

- Meets with the DSL on a regular basis to undertake reviews of the safeguarding procedures including overseeing the annual Safeguarding Report;
- Discusses any action points to be raised from the annual reports and monitors progress of these;
- Is informed immediately of any staff related safeguarding concerns and ensures contact/referral is made with any outside bodies as necessary.
- Checks that the School is compliant with statutory guidance.

Appendix B – Procedure for Dealing with Allegations Against Staff

The School has procedures for dealing with allegations against staff, governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm if he or she work regularly or closely with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Been perceived to have failed the 'harm test'.

1. Allegations against Staff

The Designated Officer should be informed of all allegations that come to the School's attention and appear to meet the criteria. Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the Head. Where appropriate, the Head will consult with the DSL and all allegations will be discussed with the Designated Officer before further action is taken. A report is made to OFSTED within 14 days if there is an allegation of serious harm or abuse by any person living, working or looking after children at the premises or elsewhere, or any other abuse on the premises. If the allegation is about the welfare of a child, then children's social care should be contacted directly.

2. Allegations against the Head or Chair of Governors

Where an allegation or complaint is made against the Head, the person receiving the allegation should immediately inform the Chair of Governors' without first notifying the Head. Similarly, if an allegation is made against the Chair of Governors, the allegation should be reported to the Head. Again, any such allegations will be discussed with the Designated Officer before further action is taken.

3. Allegations against Supply Teachers

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. The school will ensure that any such allegation is reported to the Head and is dealt with properly, and in no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority to determine a suitable outcome. The School will fully involve agencies in any enquiries from the Designated Officer, police and/or children's services, but understands that, as the organisation with direct access to Pupils and other School staff, it is likely that it will usually take the lead in any investigation involving a supply teacher.

4. Disclosure of Information

The Head will inform the accused person of the allegation as soon as possible after the Designated Officer has been consulted. The Parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the Designated Officer advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head should not inform the accused or Parents until these agencies have been consulted and it has been agreed what information can be disclosed. The Parents should be kept informed of the progress of the case, including the outcome of any disciplinary process.

5. Support

A School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.

6. Action to be taken against the Accused

Where an investigation by the police or the local authority children's social care services is unnecessary, the Designated Officer will discuss the steps to be taken with the Head (or the Chair of Governors where the allegation is against the Head). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the Designated Officer will discuss with the Head how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Local Safeguarding Partnership.

7. Suspension

Suspension must not be an automatic response to an allegation and should only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm
- the allegation warrants investigation by the police or
- the allegation is so serious that it might be grounds for dismissal.

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment.

8. Criminal Proceedings

The School will consult with the Designated Officer following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

9. Return to Work

If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child who made the allegation.

10. Ceasing to Use Staff

If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors within one month. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

11. Resignation

If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a detailed report being made to the Disclosure and Barring Service within one month in appropriate circumstances. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

12. Timescales

All allegations must be dealt with as a priority. Where it is clear immediately that the allegation is unfounded or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

13. Unfounded or Malicious Allegations

Where an allegation by a Pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's policy on behaviour, discipline and sanctions.

Where Parents have made a deliberately invented or malicious allegation, the Head will consider whether to require that Parents withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a Student or Parents (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

14. Record Keeping

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious, in which case it will be removed from the employee's records.

Appendix C Some of the following signs may be indicators of physical abuse:

Bruising

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Bruising in or around the mouth.
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g. belt marks, hand/finger marks etc.
- Linear bruising at any site, particularly on the buttocks, back or face.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks to the upper arms, forearms or legs.
- Petechial haemorrhages (pinpoint blood spots under the skin). Commonly associated with slapping, smothering/suffocation, strangling and squeezing.

Fractures

Fractures may cause pain, swelling and discolouration over a joint. It is unlikely that a child will have a fracture without the carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.

Rib fractures are possibly primarily caused in major trauma such as a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over two to three hours. All fractures of the skull should be taken seriously.

Mouth Injuries

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

Poisoning

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

Fabricated or Induced illness

Teacher and School staff may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits.
- Attendance at various hospitals, in different geographical areas.
- Development of feeding/eating disorders, as a result of unpleasant feeding interactions.
- The child developing abnormal attitudes to their own health.
- Non-organic failure to thrive – a child does not put on weight and height and there is no underlying medical cause.
- Speech, language or motor development delays.
- Dislike of close physical contact.
- Attachment disorders.
- Low self-esteem.
- Poor quality or no relationships with peers because social interactions are restricted.
- Poor attendance at school and under-achievement.

Bite Marks

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in.
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his/her feet.
- A child getting into too hot water of his/her own accord will struggle to get out and there will be splash marks.

Scars

A large number of scars and scars of different sizes and ages, or on different parts of the body, or unusually shaped, may suggest abuse.

Emotional/behavioural presentation

- Refusal to discuss injuries.
- Admission of punishment which appears excessive.
- Fear of parents being contacted and fear of returning home.
- Withdrawal from physical contact.
- Arms and legs kept covered in hot weather.
- Fear of medical help.
- Aggression towards others.
- Frequently absent from school.
- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.

Indicators in the parent

May have injuries themselves that suggest domestic abuse.
 Not seeking medical help/unexplained delay in seeking treatment.
 Reluctant to give information or mention previous injuries.
 Absent without good reason when their child is presented for treatment.
 Disinterested or undisturbed by accident or injury. Aggressive towards child or others.

- Unauthorised attempts to administer medication.
- Tries to draw the child into their own illness.
- Past history of childhood abuse, self-harm, or false allegations of physical or sexual assault.
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids.
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care.
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child.
- Wider parenting difficulties; may/may not be associated with this form of abuse.
- Parent/carer has convictions for violent crimes.

Indicators in the family/environment

- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic abuse.
- History of unexplained, illness or multiple surgery in parents and/or siblings of the family.
- Past history of childhood abuse, self-harm, or false allegations of sexual assault or a culture of physical chastisement.

Appendix D Some of the following signs may be indicators of emotional abuse.

Indicators in the child

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment.
- Aggressive behaviour towards others.
- Child scapegoated within the family.
- Frozen watchfulness, particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a “loner” – difficulty relating to others.
- Over-reaction to mistakes.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self-harm.
- Fear of parents being contacted.
- Extremes of passivity or aggression.
- Drug/solvent abuse.
- Chronic running away.
- Compulsive stealing.
- Air of detachment – “don’t care” attitude.
- Social isolation – does not join in and has few friends.
- Depression, withdrawal.
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention, low self-esteem, lack of confidence, fearful, distressed, anxious.

Indicators in the parent

Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse.

- Abnormal attachment to child e.g. overly anxious or disinterest in the child.
- Scapegoats one child in the family.
- Imposes inappropriate expectations on the child e.g. prevents the child’s developmental exploration or learning, or normal social interaction through overprotection.
- Wider parenting difficulties, may/may not be associated with this form of abuse.

Indicators on the family/environment

- Lack of support from family or social network.
- Marginalised or isolated in the community.
- History of mental health, alcohol or drug misuse or domestic abuse.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family.
- Past history of childhood abuse, self-harm or false allegations of physical or sexual assault or a culture of physical chastisement.

Appendix E Some of the following signs may be indicators of sexual abuse.

Indicators in the child

Physical Presentation

- Urinary infection, bleeding or soreness in the genital or anal areas.
- Recurrent pain on passing urine or faeces.
- Blood on undergarments.
- Sexually transmitted infections.
- Vaginal soreness or bleeding.

Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Emotional/behavioural presentation

- Makes a disclosure.
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit.
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn.
- Self-harm – eating disorders, self-mutilation and suicide attempts.
- Poor self-image, self-harm, self-hatred.
- Reluctant to undress for P.E.
- Running away from home.
- Poor attention/concentration (world of their own).
- Sudden changes in school work habits e.g. fails to complete homework.
- Withdrawal, isolation or excessive worrying.
- Inappropriate sexualised conduct.
- Wetting or other regressive behaviours e.g. thumb sucking.
- Draws sexually explicit pictures.
- Depression.

Indicators in parents

- Comments made by the parent/carer about the child.
- Lack of sexual boundaries.
- Wider parenting difficulties or vulnerabilities.
- Grooming behaviour.
- Parent is a sex offender.

Indicators in the family/environment

- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic abuse.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family.
- Past history of childhood abuse, self-harm or false allegations of physical or sexual assault or a culture of physical chastisement.
- Family member is a sex offender.

Appendix F Some of the following signs may be indicators of Neglect

Indicators in the child Physical presentation

- Failure to thrive or, in older children, short stature.
- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair.
- Red/Purple mottled skin, particularly on the hands and feet, seen in the winter due to cold.
- Swollen limbs with sores that are slow to heal, usually associated with old injury.
- Abnormal voracious appetite.
- Dry, sparse hair
- Recurrent/untreated infections or skin conditions e.g. eczema or persistent head lice/scabies/diarrhoea
- Unmanaged/untreated health/medical conditions including poor dental health
- Frequent accidents or injuries.

Development

- General delay, especially speech and language delay
- Inadequate social skills and poor socialisation.

Emotional/behavioural presentation

- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at school
- Poor self-esteem
- Destructive tendencies
- Thrives away from the home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships
- Self-harming behaviour.

Indicators in the parent

- Dirty, unkempt presentation
- Inadequately clothed.
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child e.g. anxious
- Low self-esteem and lack of confidence.
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene.
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy.
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties may/may not be associated with this form of abuse.

Indicators in the family/environment

- History of neglect in the family
- Family marginalised or isolated by the community
- Family has history of mental health, alcohol or drug misuse or domestic abuse.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family.
- Family has a past history of childhood abuse, self-harm or false allegations of physical or sexual assault or a culture of physical chastisement.
- Dangerous or hazardous home environment including failure to use home safety equipment, risk from animals.
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating.
- Lack of opportunities for child to play and learn.

Appendix G Mandatory reporting of Female Genital Mutilation (FGM)**Background**

As of 31st October 2015, the Home Office introduced a mandatory reporting duty which requires all health and social care professionals and teachers in England and Wales to report "known" cases of FGM in under 18s which they identify in the course of their professional work to the Police.

The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England.

"Teaching work" is defined as being each of the following activities: planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing and/or reporting on the development, progress and attainment of pupils.

Please note that, in addition to complying with this duty, professionals should continue to have regard to their wider safeguarding responsibilities, which require consideration and action to be taken whenever there is any identified or known risk to a child. This is in relation to FGM or any other safeguarding matter.

Making a report

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

are informed by a girl under 18 that an act of FGM has been carried out on her; or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth (see section 2.1a for further information).

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

It is important for staff to note that this duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. Staff must discuss any such cases with the Designated Safeguarding Lead and children's social care. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second report. The duty to personally report to the police does not apply in relation to at risk or suspected cases.

Cases of failure to comply with the duty will be dealt with in accordance with the existing staff disciplinary procedures already in place at Holland House School. Staff are reminded that FGM is a recognised form of child abuse and, as such, should expect Holland House School to pay due regard to the seriousness of any breach of this duty.

A breach of this duty may lead to dismissal.

Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

Visually identified cases – when you might see FGM

The duty applies to cases you discover in the course of your professional work.

If you do not currently undertake genital examinations in the course of delivering your job, then the duty does not change this.

Most professionals will only visually identify FGM as a secondary result of undertaking another action.

For teachers and social workers, there are no circumstances in which you should be examining a girl. It is possible that a teacher, perhaps assisting a young child in the toilet or changing a nappy, may see something which appears to show that FGM may have taken place. In such circumstances, the teacher must make a report under the duty, but should not conduct any further examination of the child.

Verbally disclosed cases

If you are a relevant professional and a girl discloses to you that she has had FGM (whether she uses the term 'female genital mutilation' or any other term or description, e.g. 'cut') then the duty applies. If, in the course of delivering safe and appropriate care to a girl you would usually ask if she has had FGM, you should continue to do so.

The duty applies to cases directly disclosed by the victim; if a parent, guardian, sibling or other individual discloses that a girl under 18 has had FGM, the duty does not apply and a report to the police is not mandatory. Any such disclosure should, however, be handled in line with wider safeguarding responsibilities - in England, this is likely to include referral to children's social services, and in Wales the disclosure must be immediately referred to the local authority.

Further information, including advice and support on how to talk to girls and parents/guardians about FGM, is available in the multi-agency guidance on FGM.

Timeframe for reports

Reports under the duty should be made as soon as possible after a case is discovered and best practice is for reports to be made by the close of the next working day. You should act with at least the same urgency as is required by Holland House School's safeguarding processes.

In order to allow for exceptional cases, a maximum timeframe of one month from when the discovery is made applies for making reports. However, the expectation is that reports will be made much sooner than this.

Making a report

Where you become aware of a case, the legislation requires you to make a report to the police force area within which the girl resides. The legislation allows for reports to be made orally or in writing.

It is recommended that you make a report orally by calling 101, the single non-emergency number.

When you call 101, the system will determine your location and connect you to the police force covering that area. You will hear a recorded message announcing the police force you are being connected to. You will then be given a choice of which force to be connected to – if you are calling with a report relating to an area outside the force area which you are calling from, you can ask to be directed to that force.

Calls to 101 are answered by trained police officers and staff in the control room of the local police force. The call handler will log the call and refer it to the relevant team within the force, who will call you back to ask for additional information and discuss the case in more detail.

You should be prepared to provide the call handler with the following information:

- Explain that you are making a report under the FGM mandatory reporting duty
- Your details:
 - Name
 - Contact details (work telephone number and e-mail address) and times when you will be available to be called back
 - Role
 - Place of work details of your organisation's designated safeguarding lead
 - Name
 - contact details (work telephone number and e-mail address)
 - Place of work
- The girl's details
 - name
 - age/date of birth
 - address

If applicable, confirm that you have undertaken, or will undertake, safeguarding actions, as required by "Working Together to Safeguard Children" and as appropriate.

You will be given a reference number for the call and should ensure that you document this in your records.

Informing the child's family

If you have made a report, the Designated Safeguarding Lead and/or the Head should be informed. A discussion will then take place as to whether it is safe to contact the girl and/or her parents or guardians to explain the report, why it is being made, and what it means. Wherever possible, this discussion should be held in advance of/in parallel to the report being made.

Advice and support on how to talk to girls and parents/guardians about FGM is available in the multi-agency guidance on FGM.

If the Designated Safeguarding Lead and the Head believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, then information will be shared with the appropriate agencies and advice sought as to how best to proceed. This may include a further phone call to the Police.

Your responsibilities after you have made a report

In relation to any next steps, staff are expected to continue to have regard to their wider safeguarding and professional responsibilities.

Depending on the member of staff's role and the specific circumstances of the case, individuals may be required to contribute to the multi-agency response or other follow up to the case which will follow any report made.

If any member of staff is unsure as to their responsibilities, they should seek advice from the Designated Safeguarding Lead or Head.

Appendix H Child on child sexual violence and sexual harassment KCSiE (2021) Part 5

KCSiE 2021 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

Sexual violence or sexual harassment occurs between children of any age and sex in Primary through Secondary Schools and Colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, occurring online and face to face. It is more likely

that girls will be the victims of sexual violence and sexual harassment; and more likely it will be perpetrated by boys.

Staff need to understand:

- consent
- power-imbalance
- developmental stages
- harmful sexual behaviour
- how to respond

Holland House School recognises that the school culture is important. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours can lead to a culture of unacceptable behaviour. Not tackling peer-on-peer abuse can lead to an unsafe environment, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff should address any inappropriate behaviour (even if it appears to be relatively innocuous) as this **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual Violence

Sexual violence is those sexual offences under the Sexual Offences Act 2003 as described below:

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

Consent

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

Some situations are statutorily clear:

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assaults are defined in law;
- Making and sharing sexual photos and videos of under 18s is illegal. This includes children making and sharing sexual images and videos of themselves.

Sexual Harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to:

- Violate a child's dignity, and/or
- Make them feel intimidated, degraded or humiliated and/or
- Create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes an appearance and calling someone sexualised names.
- Sexual "jokes" or taunting;
- Physical behaviour such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos;
 - Sexualised online bullying;
 - Unwanted sexual comments and messages, including, on social media; and
 - Sexual exploitation; coercion and threats.

Harmful sexual behaviours:

Harmful sexual behaviours are problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. 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. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

Examples include:

- Touching the genitals of other young people
- Forcing others into sexual activity
- Exposing themselves or masturbating in public
- Sexually explicit talk to or touching of younger children.

It is vital for professionals to distinguish normal from abnormal sexual behaviours. A child's sexual behaviour should be considered abnormal if it:

- Occurs at a frequency greater than would be developmentally expected
- Interferes with the child's development
- Occurs with coercion, intimidation, or force
- Is associated with emotional distress
- Occurs between children of divergent ages or developmental abilities
- Repeatedly recurs in secrecy after intervention by caregivers

Holland House School acknowledges its statutory duty to safeguard and promote the welfare of the children at the school and as part of this duty it:

- Considers the makeup of the student body, including gender and age range of its pupils, and whether additional support for children with protected characteristics – who are potentially at greater risk – is appropriate.
- Considers what it can do to foster healthy and respectful relationships between boys and girls through personal, social, health and economic education (PSHEE)

- Ensures that its response to boy on boy and girl on girl sexual violence and sexual harassment is equally robust as it is for sexual violence and sexual harassment between children of the opposite sex.

Response to a Report/Managing the Disclosure

It is essential that the child providing the disclosure is reassured that they are being taken seriously and that they will be supported and kept safe. Staff should be aware that Children with SEND are more likely to be victims of sexual violence.

Children may well not directly verbalise their abuse to adults but it may be shown in their behaviour, information may come from a friend or an overheard conversation.

Effective safeguarding practice includes:

- Not promising confidentiality as it is very likely a concern will have to be shared further.
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the disclosure will be progressed.
- Only recording the facts as the child presents them.
- Don't ask leading questions.
- Only prompt the child where necessary using open questions, like – where, when, what, etc.
- Informing the designated safeguarding lead, or Deputy as soon as practically possible.
- DSL will review the report; and then carry out a risk and needs assessment.
- Give information about how the report will be progressed.

How the report is dealt with, will affect whether others will come forward in future. A child is likely to report to someone they trust – this could be **anyone**. The victim mustn't feel like they're a nuisance for reporting their concerns. They need to feel listened to and be taken seriously. A written report recording only the facts as reported, is essential.

One-off incidents will be dealt with under the school's behaviour policy or anti-bullying policy. Early help will be made available for non-violent harmful sexual behaviours. All incidents where a child has been harmed, is at risk of harm or in immediate danger. All incidents of rape, assault by penetration or sexual assault will be reported to the Police.

Confidentiality

Staff taking disclosure should never promise confidentiality. The designated safeguarding lead, or a deputy, should consider the following:

- Parents and carers should normally be informed unless this would put the child at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed then a referral should be made to children's social care.
- Rape, assault by penetration and sexual assaults are criminal offences and should be passed to the police.

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will be aware of anonymity, witness support and the criminal process in general so it can offer support and act appropriately. Further information is available from [CPS: Safeguarding children as victims and witnesses](#).

Risk Assessment

In the event that a report of sexual violence has been received, the Designated Safeguarding Lead or a deputy should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case by case basis. The risk and needs assessment should consider the:

- Child making the disclosure
- Alleged perpetrator
- Both other children and, if appropriate, staff at the school.

Risk assessments should be recorded, either written or electronically, and should be kept under review. The designated safeguarding lead or a deputy should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

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

The Designated Safeguarding Lead will give consideration to:

- The nature of the alleged incident(s), including whether a crime has been committed and consideration of harmful sexual behaviour.
- The ages of the children involved.
- The developmental stages of the children involved
- Any power imbalance between the children, for example if the alleged perpetrator is significantly older.
- If the alleged incident is an isolated incident or a sustained pattern of abuse.

The starting point regarding any report should always be that sexual violence and sexual harassment are not acceptable and will not be tolerated.

Children sharing a classroom

Following a report of rape and assault by penetration, while the school establishes the facts of the case, and starts the process of liaising with Children's social care and the police;

- The alleged perpetrator should be removed from any classes they share with the victim.
- The school should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from school.

Following a report of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, in all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school should consider any suitable sanctions in light of its behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the victim and the perpetrator should continue to be kept in separate classes and continue to manage potential contact on school premises and transport.

In all circumstances, the school should record and be able to justify its decision making. All of the above should be considered with the needs of the victim at the heart of the process, supported by parents and carers as appropriate. Any arrangements should be kept under review.

Ongoing response

Safeguarding and supporting the victim

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult, for example their form tutor or designated safeguarding lead, to talk to about their needs.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. There may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities.

If the trauma results in the victim being unable to remain in school, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim and following discussion with their parents or carers.

Safeguarding and supporting the alleged perpetrator

The school will balance safeguarding the victim and the wider student body, with providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing disciplinary sanctions.

Consideration should be given to:

- The age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- The proportionality of the response. Support and sanctions should be considered on a case by case basis.

Discipline and the alleged perpetrator

Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent the school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly.

Working with parents and carers

The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence. This might not be necessary or proportionate in the case of sexual harassment and should be considered on a case by case basis. The exception will be if there is a reason to believe informing a parent will put a child at additional risk.

The school should meet the victim's parents and carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

The school should meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact the alleged perpetrator.

Safeguarding other children

Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

The school will do all it can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed, including online or by social media.

The school adopts a whole school approach to safeguarding, a culture that makes clear that sexual violence and sexual harassment is always unacceptable, and a strong preventative education programme through PSHE lessons will help create an environment in which all children at the school are supportive and respectful to their peers when reports of sexual violence or sexual harassment are made.

Appendix I Child Protection During The COVID-19 Measures

1. Context

The way schools and colleges are currently operating in response to Coronavirus (COVID-19) is fundamentally different to business as usual.

Schools have been asked to provide care for children who are vulnerable and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This document will be reviewed by the Designated Safeguarding Lead (DSL) or a Deputy DSL on a regular basis as circumstances continue to evolve, or following updated Department for Education advice or guidance.

The school will ensure that on any given day, all staff in attendance will be aware of who the DSL and Deputy DSL's are, and how they can contact them.

2. Safeguarding Priority

During these challenging times, the safeguarding of all children at the school – whether they are currently at home or in attendance – continues to be the top priority. The following fundamental safeguarding principles remain the same:

- The best interests of children continue to come first
- If anyone in the school has a safeguarding concern, they will act immediately
- A DSL or Deputy DSL will always be available by email or phone
- Children who continue to be protected when they are online

3. Safeguarding Partners' Advice

The school continues to work closely with the safeguarding partners and will ensure this appendix is consistent with their advice. This will include expectations for supporting children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need. The current advice can be found by the link below:

http://www.thegrid.org.uk/info/welfare/child_protection/referral/consultation.shtml

4. Roles and Responsibilities

The roles and responsibilities for safeguarding in Schools remain in line with the safeguarding policy. A DSL or Deputy DSL will be available by phone and/or online video. The Designated Safeguarding Lead (DSL) is Raksha Dave, contact details: email rakshadave@hollandhouse.org.uk, telephone 07977 994441.

The Deputy Designated Safeguarding Lead (Deputy DSL) for child protection is the Head, Emily Brown, contact details: email emilybrown@hollandhouse.org.uk, telephone 07846 158153.

5. Vulnerable Children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans.

Those who have a social worker include children who have a child protection plan and those who are looked after by the local authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

There is an expectation that vulnerable children who have a social worker will attend school, so long as they do not have underlying health conditions that put them at risk. Where a parent does not want their child to attend school, and their child is considered vulnerable, the school will discuss this with the social worker and explore the reasons for this directly with parent.

6. Increased Vulnerability or Risk

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Staff will be aware of this in setting expectations of pupils' work where they are at home. Where the school is providing for children of critical workers and vulnerable children on-site, it will ensure appropriate support is in place for them. Staff will be aware of the mental health of children and their parents and carers, and will contact the DSLs if they have any concerns.

7. Reporting Concerns about Children or Staff

The importance of all staff acting immediately on any safeguarding concerns remains. Staff will continue to follow Child Protection procedures as described in this safeguarding policy, and advise the DSL of any concerns they have had about any child, including those who are not attending school.

8. Staff Training

For the duration of the COVID-19 measures, staff training will be kept up-to-date.

9. Peer-on-Peer Abuse

The school recognises that children can abuse their peers and staff are clear about the school's policy and procedures regarding peer-on-peer abuse. All peer-on-peer abuse is unacceptable and will be taken seriously. The school also recognises that abuse can still occur during the school closure or partial closure and between those children who do attend the school site during these measures. Staff will remain vigilant to the signs of peer-on-peer abuse and will follow the process set-out in this safeguarding policy.

10. Online Safety

It is likely that children will be using the internet and engaging with social media far more during this time. Staff are aware of the signs cyber bullying and other online risks, and the school's filtering and monitoring software remains in use for children who are in school during this time to safeguard and support children.

Staff will follow the process for online safety set out in the guidance below – important safeguarding advice for livestreaming lessons.

Staff who interact with children online will continue to look out for signs the child may be at risk. If the staff member is concerned about the child, that staff member will report the concern to the DSL.

11. Important Safeguarding Reminder for Livestreaming Lessons

When staff start to record or livestream lessons via an online platform, in order to assess any risks and take appropriate actions to minimise harm and protect themselves and pupils, things that will be considered include:

a. Group Communications

- All communication with pupils must be made using a school, not personal, email and on a school device
- Staff and pupils must be wearing suitable clothing, as must anyone on the background
- Staff and pupil computers preferably not be in bedrooms, but in a communal area, where possible against a neutral background with no photos or personal items visible.
- Live lessons should be kept to a reason length of time, and should not exceed the normal length of the lesson.
- Language must be professional and appropriate

b. Additional Advice for 1:1 Communication

- There should be no 1:1 live cam teaching without written permission from the parent. Group chats are acceptable.
- A live chat should be time and date logged, recoded and backed-up elsewhere so that the video can be reviewed if necessary – there is a mechanism for doing this on Team where a log is kept automatically.
- If a staff member needs to contact a parent, they must first discuss this with the head. Use 141 in front of the number to be dialled so that the recipient cannot access the staff member's personal number. Staff must be mindful of data protection and delete any parent numbers.

c. VMTs and Music Lessons in 1:1 Forum

Visiting music teachers should seek permission from the parent to carryout 1:1 lessons with their pupils. An email is acceptable, but it must be kept and forwarded to the Head. Microsoft Teams can be used if required.

12. Pastoral Support for Children not in School

Where the DSL has identified a child who needs support, or who would normally receive additional pastoral support in school, they will ensure that a communication plan is in place to support that child via the Deputy Head Pastoral or in their absence, the Head.

