Safeguarding & Child Protection Policy 2025-2026

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MORE HOUSE SCHOOL
KNIGHTSBRIDGE

This policy is available on the School website and can be made available in large print or other accessible format if required.

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Section 1: Safeguarding and Child Protection at More House School

1.1 Important contacts

Parents should contact the DSL in the first instance if they have concerns or any of the personnel listed below thereafter.

Role/Organisation	Name	Contact details
Designated Safeguarding Lead (DSL) and Mental Health Lead	Ms Suzanne Della-Porta (Director of Pastoral Care)	sdella-porta@morehousemail.org.uk
Deputy DSL	Mr Michael Keeley (Head of Operations)	Tel : 020 7235 2855, mkeeley@morehousemail.org.uk
Head Deputy DSL	Ms Claire Phelps	Tel : 020 7235 2855, office@morehousemail.org.uk
Designated Teacher for Looked-After and Previously Looked-After Children	Mr Johnathan Roberts (SENCO)	Tel: 020 7235 2855 jroberts@morehousemail.org.uk
Governor with oversight of Safeguarding	Mrs Sue Shale	office@morehousemail.org.uk
Chair of Governors	Mr Ian Bogle	office@morehousemail.org.uk
Local authority designated officer (LADO)	Aqualma Daniel Safer Organisations Manager & Local Authority Designated Officer (LADO) RBKC and Westminster Royal Borough of Kensington and Chelsea / City of Westminster	Tel : 07870481712 Email Aqualma.Daniel@rbkc.gov.uk
Channel Helpline	Preventing extremism in education settings Hammersmith & Fulham and Kensington and Chelsea Prevent	Tel : 020 7340 7264 Tel: 020 8753 5727 prevent@lbhf.gov.uk prevent@rbkc.gov.uk Simone Torry (Prevent Edu Officer) 07554 222610 simone.torry@lbhf.gov.uk

Bi-Borough Safeguarding in Schools Education Lead	Royal Borough of Kensington and Chelsea & Westminster City Council	elaine.campbell@rbkc.gov.uk 020 7361 3000 07712 236508
Local Authority	Hammersmith & Fulham Kensington and Chelsea Westminster	familyservices@lbhf.gov.uk Tel: 020 8753 6600 socialservices@rbkc.gov.uk Tel: 020 7361 3013 accesstochildrensservices@westminster.gov.uk Tel: 020 7641 4000

1.2 Mission Statement & Aims

At More House School, we believe that all children have a right to attend School and learn in a safe environment. Children should be free from harm by adults and other pupils in the School. All members of our School community should be treated with equal value as human beings and have the right to respect and tolerance. Our approach to safeguarding is child-centred and we ensure that we consider, at all times, what is in the best interests of the child.

We believe that safeguarding and promoting the welfare of children is everyone's responsibility. We have assessed the risks to students posed at More House School and detailed how to respond to concerns in this policy.

The core safeguarding principles of More House School, hereafter referred to as the 'School', are:

- It is the responsibility of the School to safeguard and promote the welfare of children;
- Children who are and feel safe make more successful learners;
- Representatives of the whole-School community of pupils, parents, staff and governors will be involved in policy development and review, and
- Safeguarding policies will be reviewed annually by the Governing Board, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy (which includes all sections and all of the appendices in this document) is one of a series in the School's integrated safeguarding portfolio (See Section 17 of this document). This policy has been authorised by the Governing Board, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example during periods of remote learning, at an activity centre or on an educational visit.

The School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's

welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

1.3 Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and the Working Together to Safeguard Children (2023). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy also has regard to the following DfE and local authority guidance:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the School;
- The Children Act 1989 (and 2004 amendment); which provides a framework for the care and protection of children;
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18;
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children;
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children;
- Statutory guidance on the Prevent duty, which explains Schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism; in addition The use of social media for on-line radicalisation (July 2015);
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR);
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governors and Head should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our School to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment;
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how we might improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination;

- The Education Act (2002), which places a duty on Schools and local authorities to safeguard and promote the welfare of pupils;
- What to do if you're worried a child is being abused (2015), This advice is non-statutory, and has been produced to help practitioners identify child abuse and neglect and take appropriate action in response;
- Safeguarding Children Partnership (LSCP) Arrangements (2019), This is a key contextualised document that our key safeguarding partners provide to support keeping children and young people in our area safe;
- Sexual Exploitation 2017, This advice is non-statutory, and has been produced to help practitioners, local leaders and decision makers who work with children and families to identify child sexual exploitation and take appropriate action in response;
- Promoting and supporting mental health and wellbeing in Schools and colleges (2021), This document describes the areas a School should consider to enable good mental health and wellbeing practice;
- What to do if you think a child is being abused (2015);
- Information sharing (2024);
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated July 2025);
- Prevent Duty Guidance: for England and Wales (2023).

Any deficiencies or weaknesses in the child protection arrangements will be remedied without delay.

1.4 Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or

development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
These are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

Children includes everyone under the age of 18.

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

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

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

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

1.5 Policy Statement

The School recognises our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected, valued and listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

1.6 Principles

Principles

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment:

- The School will ensure that the welfare of children is given paramount consideration when developing and delivering all School activities;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection and to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, and
- All staff have an equal responsibility to act, in accordance with this guidance, on any suspicion, concern or disclosure that may suggest a child is at risk of harm.

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and in accordance with the School's Safer Recruitment Policy. Where staff from another organisation are working with pupils on another site, the School will have received written confirmation that appropriate child protection checks and procedures apply to those staff.

All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the School who will follow this policy guidance in doing so.

The School will work with other agencies, including social care, the police and health services (and in line with multi-agency safeguarding arrangements put in place by the safeguarding partners) wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering harm or who may suffer harm without appropriate intervention.

The School takes a zero tolerance approach to all forms of abuse and recognises that abuse may be taking place even when it is not reported.

1.7 Context

Section 87(1) of the Children Act 1989, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 (as amended) require the proprietor of the School to have arrangements, including any guidance issued by the Secretary of State to safeguard and promote the welfare of pupils at the School. The latest statutory guidance covering this policy is contained in the documents Keeping Children Safe in Education (KCSIE) 2025 and Working Together to Safeguard Children 2023. The Kensington & Chelsea Safeguarding team also publishes guidance and information for schools in our area.

The School and its staff form part of the wider safeguarding system for children. This system is described in Working Together to Safeguard Children 2023. The School works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Every School is required to have a Designated Safeguarding Lead (DSL) who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as Children's Social Care. The DSL and Deputy DSLs are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns.

The DSL for More House School (and our nominated deputies) are named in this policy (See Section 1.1). The Local Safeguarding Children Partnership (LSCP) maintains a list of all designated senior persons (DSLs) for safeguarding and child protection.

1.8 Equity statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 8);
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language (EAL);
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- Are asylum seekers;
- Are at risk due to either their own or a family member's mental health needs;
- Are looked after (LAC) or previously looked after (PLAC), (see Section 10);
- Are missing or absent from education for prolonged periods and/or repeat occasions, or
- Have a parent/carer who has expressed an intention to remove them from School to be home educated.

Section 2: The Role of School Staff

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

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

- Behaviour and Discipline policy;
- Pastoral support system, and
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships;
    - Boundaries and consent;
    - Stereotyping, prejudice and equality;
    - Body confidence and self-esteem;
    - How to recognise an abusive relationship (including coercive and controlling behaviour);
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support, and
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

2.1 All Staff

School staff are particularly important as they are in a position to identify concerns (including online concerns) early, provide help for children and prevent concerns from escalating. The School also recognises the expertise that staff build by undertaking safeguarding training and managing concerns and therefore considers their feedback carefully in shaping safeguarding arrangements and this policy.

All staff have a responsibility to provide a safe environment in which children can learn and to be aware of the systems within our School which support safeguarding. These will be explained as part of staff induction and will form part of regular training.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually;
- Sign a declaration at the beginning of each academic year to say that they have reviewed and understand the guidance;
- Reinforce the importance of online safety when communicating with parents and carers.

This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online), and
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this Safeguarding and Child Protection policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and Deputies (DDSLs), the Behaviour and Discipline policy, the E-safety policy, Sexual Violance and Sexual Harassment policy and the safeguarding response to children who go missing from education;
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm;
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- The fact that children can be at risk of harm inside and outside of their home, at School and online;
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children;
- The fact that a child and their family may be experiencing multiple needs at the same time;
- What to look for to identify children who need help or protection;
- What to do if a pupil tells them that they are being abused or neglected (including a report of child-on-child sexual violence and sexual harassment), maintaining an appropriate level of confidentiality and never promising the child that they will not tell anyone about a report of abuse;
- How to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harrassment and no victim ever be made to feel ashamed for making a report, and
- The fact that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments and should consider whether children are at risk of abuse or exploitation in situations outside of their families.

Section 14 of this policy outlines in more detail how staff are supported to do this.

All staff are also required to adhere to safeguarding updates given in staff briefings and pastoral meetings.

2.2 Designated Safeguarding Lead (DSL)

The Governing Board ensures that an appropriate member of the Senior Leadership Team is appointed to the role of DSL. Our DSL is Suzanne Della-Porta (Director of Pastoral Care). The DSL and Deputy DSLs take lead responsibility for child protection and wider safeguarding in the School. This includes online safety, and understanding our filtering and monitoring processes on School devices and School networks to keep pupils safe online.

During term time, the DSL will be available during School hours for staff to discuss any safeguarding concerns. The DSL will be contactable out of School hours if necessary by the emergency School number: 07393 392745

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

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- Contribute to the assessment of children;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- Have a good understanding of Harmful Sexual Behaviour, and
- Have a good understanding of the filtering and monitoring systems and processes in place at our School.

The DSL is also the Prevent lead and will make sure staff have appropriate Prevent training and induction.

The DSL will also:

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

The full responsibilities of the DSL and deputies are set out in their job description.

Availability of DSL

- During term time the DSL should always be available (during School hours) to discuss any safeguarding concerns. The DSL will also be available if necessary during out-of-hours/out of term activities via phone or email; sdella-porta@morehousemail.org.uk.
- When the DSL is absent, the Deputies - Mr Michael Keeley (DDSL and Head of Operations) and Ms Claire Phelps (DDSL) will provide cover.

2.3 Governing Board

It is the Governing Board's overall responsibility to ensure compliance with Child Protection statutory requirements. The Governing Board takes seriously its responsibility to uphold the aims of the charity and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of Safeguarding practice at the School enables the Governing Board to ensure compliance with current legislation and to identify areas for improvement. The Governing Board recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given. The Governing Board has a lead representative who is responsible for the School's safeguarding arrangements.

The Governing Board will:

- Facilitate a whole-School approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head to account for its implementation;
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our School's local multi-agency safeguarding arrangements;
- Appoint a Senior Board level (or equivalent) link Governor to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person from the DSL;
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners;
- Ensure that the School has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provision in place, and that they understand their expectation, roles and responsibilities around filtering and monitoring as part of safeguarding training, and
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the School in meeting these standards.
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
    - Online safety is a running and interrelated theme within the whole-School approach

to safeguarding and related policies;
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;
    - The School has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure, and
    - This policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the School roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
    - Make sure there are arrangements for the body to liaise with the School about safeguarding arrangements, where appropriate, and
    - Make sure that safeguarding requirements are a condition of using the School premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head, where appropriate (see Appendix 3).

All governors will read Keeping Children Safe in Education in its entirety. Section 14.3 of this policy has information on how governors are supported to fulfil their role.

2.4 The Head

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction, and
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the School and via the School website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3), and
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

2.5 Virtual School Heads

Virtual School eads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

2.6 Pupils

It is recognised that pupils themselves have a responsibility to report any concerns that they might have relating to a member of staff, a volunteer or a fellow pupil by either speaking directly to the DSL or another member of staff or by using the Student Concern Form (Appendix 6). This information is clearly displayed in each classroom, and referenced through the PSHE programme and assemblies.

Section 3 - Safeguarding Procedures

3.1 Safer recruitment

The School is committed to safer recruitment and is responsible for implementing the practices as set out in the School's Safer Recruitment Policy.

3.2 Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety and Educational visits procedures are set out in the Health and Safety Policy, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

Where extended School activities are provided by and managed by the School, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site, the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips, we will check that effective child protection arrangements are in place and request written confirmation from the alternative provision that all safer recruitment checks have been completed on individuals working at the establishment.

All staff are bound by the School's Educational Visits Procedures when arranging and organising off-site trips. All trip leaders have a meeting with the DSL during the planning stages of the trip to assess safeguarding risks and the DSL checks risk assessment and final arrangements before departure.

If More House School were to organise exchange visits where pupils are accommodated by host families, those responsible are required to check host families and get appropriate assurances from partner Schools overseas.

If a visiting School wishes their pupils to stay with host families, we would ensure that all adults within the host families had undertaken a DBS check and that there were no safeguarding concerns.

3.3 Work Experience (to be read in conjunction with Careers Policy)

- Work experience arrangements include safeguarding information for employers and a requirement that they accept their Child Protection responsibilities;

- The School recognises it has a legal responsibility, so far as is reasonably practicable, to take steps to ensure we do not expose pupils to risks to their health and safety. It is therefore essential that pupils are properly prepared and briefed on the hazards of the workplace and the control measures provided to reduce or eliminate the risk of injury before they start their placement. The School takes steps to ensure employers, workplace supervisors and other employees know exactly what is expected of them and are aware of their legal responsibilities;
- It is the School's responsibility to determine whether a particular child is suitable for a placement. Hence if a child is considered vulnerable, the School will take this into account when finding a suitable placement;
- Although the School has a responsibility for ensuring pupils' welfare with regard to personal medication, it is the responsibility of the parent/carer to ensure medication is provided on the site should it be needed. Placement providers are made aware of any medical requirements and actions needed in case of emergencies;
- The School recognises its responsibility to monitor the suitability of potential placements, including checks carried out for Health and Safety and also to ensure that businesses have up to date and full Employers' Liability insurance. In the event of these criteria not being met, pupils are advised that the placement cannot go ahead and the School works with the pupil to find an alternative placement. When a parent wishes their child to attend a placement not covered, the School must have a written declaration of authority from the parent stating they take full responsibility for the safeguarding of their child while on placement;
- Pupils on work experience have the same status as employees under HSWA, and employers have a general duty (under Section 2) to ensure their health, safety and welfare;
- The Working Time Regulations (1998) apply to pupils on work experience; however, the number and patterns of hours worked is normally agreed by the provider, School and student. If possible, normal working hours should be worked and, where any requirement is outside of those hours, parental consent has to be obtained prior to the placement starting, and
- Contact is made by the School at least once during the work experience placement and, where possible and appropriate for specific vulnerable pupils, visits are undertaken to the placement.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

3.4 Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children

through taking or using images, so we must ensure that we have some safeguards in place. To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- Seek parental consent via the annual Essential Information form sent to parents;
- Use only the child's first name with an image;
- Ensure that children are appropriately dressed;
- Encourage children to tell us if they are worried about any photographs that are taken of them, and
- Ask for photos taken during School events not to be shared on social media and recommend that people check the privacy settings of their social media account to understand who else will be able to view any images they share.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Staff Code of Conduct and E-Safety Policy.

3.5 Secure premises

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

The School keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. Visitors will be asked to read the Safeguarding card on arrival.

If there is a situation where a parent's physical or mental state or behaviour is of concern the School Office will be informed and a risk assessment will be completed as required.

3.6 One-to-One Teaching

The School recognises that there may be occasions when a pupil is taught in a one-to-one capacity (for example in peripatetic music lessons), either in School or online. Our risk assessment on One-to-One Teaching outlines the additional measures that are in place to safeguard both the pupils and teaching staff and how we raise awareness of this issue.

Section 4: Child Protection Procedures

It is important that a child at risk or in need, receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to:

- Identify, act on and refer the early signs of abuse and neglect in a timely manner;
- Keep clear written records;
- Listen to the views of the child;
- Reassess concerns when situations do not improve, and
- Share information quickly and challenge inaction.

4.1 Early Help

Early Help means providing support as soon as a problem emerges at any point in a child's life. Any child may benefit from Early Help, but all School staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has special education needs (whether or not they have a statutory education health and care plan);
- Is a young carer;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing or goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse/and or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child;
- Is vulnerable to being bullied, or engaging in bullying;
- Is living in temporary accommodation;
- Is living transient lifestyles;
- Is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality, or
- Is not making age appropriate progress and the causes are unclear.

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

4.2 Early Help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other

agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

The Kensington and Chelsea Early Help team can be contacted on:

Tel: 020 7598 4601 or 020 7361 4129
Email: earlyhelp@rbkc.gov.uk

4.3 Referral

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

If you make a referral directly (see Section 5.1), you must tell the DSL as soon as possible.

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

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

The LSCP team has produced a Safeguarding Referral flowchart that can be used in the assessment of a referral.

For safeguarding advice or referrals please contact the Local Authority where the child resides:

Westminster child /young person:

Email: accesstochildrenservices@westminster.gov.uk

9am–5pm weekdays on 020 7641 4000 or outside of these times the Emergency Duty Team on 020 7641 2388.

Kensington and Chelsea child/young person:

Email: socialservices@rbkc.gov.uk

9am–5pm weekdays on 0207 361 3013 or outside of these times the Emergency Duty Team on 0207 373 2227.

4.4 Action by the DSL - referral to children's social care

The DSL (or in their absence, a Deputy DSL) will make a referral to children's social care immediately if it is believed that a child has suffered or is at risk of suffering significant harm.

In situations where a pupil is not at risk of suffering significant harm but is instead in need of additional support from one or more agencies, the DSL will still liaise with children's social care and, depending on their advice, will complete a CAF Common Assessment form to recommend assessment/referral of the pupil and/or her parents for appropriate social care services.

Many School pupils are resident in other boroughs; in these cases, a CAF form should be obtained by contacting the local children's services team for the Borough of residence.

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to children's social care will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the children's social care within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the children's social care again.

All concerns, discussions and decisions made and the reasons for these decisions will be recorded in writing on CPOMS and updated as necessary.

Section 5: Recognising abuse and taking action

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

Please note - in this and subsequent sections, you should take any reference to the DSL to mean "the DSL (or deputy DSLs)".

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

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

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

Staff should follow the reporting procedures outlined below. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL, their deputies, the Head and/or the Chair of Governors are all unavailable, or
- they are convinced that a direct report is the only way to ensure the child's safety.

Staff should make a referral to children's social care and/or the police **immediately** if they believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see Section 2.2) as soon as possible if you make a referral directly.

Under these circumstances, you (or, if necessary, the most senior person in the School that you can find to help you) should contact the Social Services team at Kensington & Chelsea in the first instance for advice on how to refer:
020 7361 3013 - Social Services Line, Monday to Friday: 8.30am - 5pm, or
020 7373 2227 - Emergency social worker, out of hours service.

You will be required to give the following information:

- Your Name and the School Address, and
- Name, Address and Date of Birth of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party, including those connected to the child you have concerns about. If the child does not live within the Borough of Kensington & Chelsea, then you will be advised which Borough to contact with your concerns.

Other ways to report your concerns:

Call the local specialist Police child protection team on 101

NSPCC – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence, or text anonymously to 88858.

Guidance is also available following the link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

5.2 If a child makes a disclosure to you

It takes a lot of courage for a child to disclose that they are being neglected and/or abused.

They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell, they may have lost all trust in adults or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it until the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- Remain calm and do not overreact or show you are shocked or upset – the child may stop talking if they feel they are upsetting you;
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- Do not be afraid of silences – remember how hard this must be for the child;
- Under no circumstances ask investigative questions – such as how many times this has happened or what does the child's mother thinks about all this;
- At an appropriate time tell the child that in order to help them you must pass the information on, do not promise to keep it a secret;
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day;
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it, and
- Sign and date the write-up or type up the details on CPOMS and pass it on to the DSL as soon as possible. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 5.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Taking action: advice for staff

- In an emergency take the action necessary to help the child, for example, call 999;
- Report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 3 should be followed;
- If the DSL is not available, ensure the information is shared with a deputy DSL (or in their absence, with the most senior person in the School that day). If there is a risk of immediate serious harm to a child and it is not possible to report the matter in

accordance with this procedure, a referral should be made to children's social care immediately. See Section 5.1, above;
- Do not start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family, and
- Seek support for yourself if you are distressed.

Bear in mind that some children may:

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

None of the above should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

5.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 2 of this policy.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged **18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

Advice on reporting can be found by following this link to a document that explains the local context for professionals working in Hammersmith and Fulham, Kensington and Chelsea and Westminster.

Specialist advice can be obtained from Elaine Campbell, Safeguarding in Education lead.

Key Contacts:

Police: call 101 to report a direct disclosure of FGM from a child or a visual confirmation of FGM.

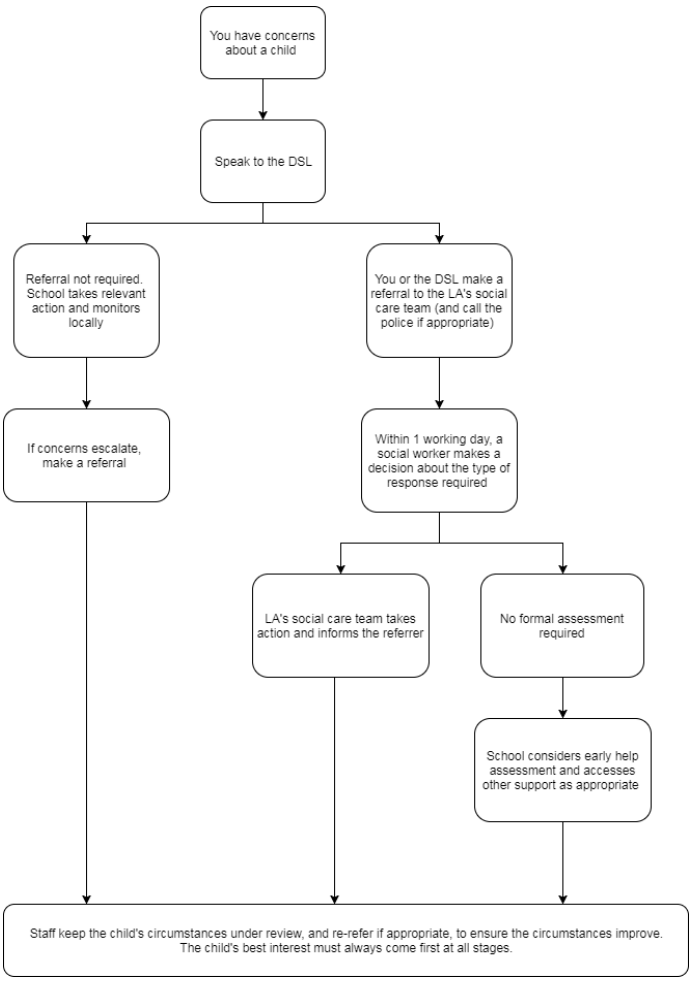
Elaine Campbell – Safeguarding in Education Lead – Tel: 0781 736 5519
Debbie Raymond – Joint Head of Safeguarding – Tel: 0773 931 5970

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

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

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

Figure 1. Procedure to follow if you have any concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger).
Note - if the DSL or deputies are unavailable, this should not delay action.



If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, the matter should be referred to the DSL as soon as possible using the Safeguarding Concern Form (see: Appendix 5) or via the CPOMS safeguarding programme. Any Safeguarding Concern Form should be completed by hand and given to the DSL in a sealed envelope.

There will be occasions when you suspect that a child may be at serious risk, but you have no ‘real’ evidence. The child’s behaviour may have changed; their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Use CPOMS or a Safeguarding Concern Form (see: Appendix 5) to record these early concerns and pass it to the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of harm you should follow the advice in Section 5.2 ‘If a child discloses information to you’ above.

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

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

5.5 If you have concerns about Extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which School staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group, or
- See or hear something that may be terrorist-related.

5.6 If you have a Mental Health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 5.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action. This may involve the engagement of Early Help resources within School (such as the School counsellor) or support from outside agencies.

5.7 Concerns about a staff member, supply teacher, volunteer or contractor

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

The Head/Chair of Governors will then follow the procedures set out in Appendix 3, if appropriate.

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

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

5.8 Allegations of abuse made against other pupils

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our School’s Behaviour and Discipline policy, but this Safeguarding and Child Protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See Appendix 2 for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, but do not investigate it;
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;

- The DSL will put a risk assessment and support plan in place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering School transport as a potentially vulnerable place for a victim or alleged perpetrator(s);
- The DSL will contact the children and adolescent mental health services CAMHS, if appropriate
- The DSL will contact the School counsellor with parental consent as needed

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

The School actively refers concerns/allegations of child-on-child abuse where necessary to the LSCP (Royal Borough Kensington and Chelsea/ Westminster) and/or other relevant agencies. Children resident out of the Borough but attending More House School will be reported to their home Multi Agency Safeguarding Hub (MASH) or equivalent social care.

Pupils are able to and **should** report any instances of peer abuse, wherever it has taken place, in person either to a DSL or another member of staff or anonymously, using a Student Concern Form. The School will ensure that the methods of reporting are well promoted. When a report of peer abuse is received, it will be treated seriously and acted on promptly; the victim will be supported and kept safe. The School has in place a robust and differentiated programme of educational events and initiatives aimed at minimising the risk of child on child abuse. It also places great importance on engaging with all stakeholders, including parents, pupils and staff to develop its policies and procedures.

The School's Anti-Bullying Strategy and Policy on Sexual Violence and Sexual Harassment can be found on the staff Google Drive and the School website. The School acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes homophobic and gender related bullying (including online). If there is a concern that a child is at risk of serious harm, the School's Child Protection Procedures must be followed.

Children may be harmed by other children or young people and will be supported through the pastoral system, including tutors, senior staff and the School counsellor as appropriate. Staff will be aware of the harm caused by bullying and will use the School's Anti-Bullying procedures where necessary. The School recognises the particular vulnerability of girls (and, in particular those with SEND) to abuse and these girls are supported by their form tutor on a daily basis.

There will be occasions when a child's behaviour warrants a response under child protection rather than Anti-Bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with this and the named associated policies. A factual record will be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer,

significant harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and children's social care services as described above. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils.

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate her if it is necessary to suspend her during the investigation.

Where neither social services nor the police accept the complaint, a thorough School investigation will take place into the matter using normal disciplinary procedures. If the School considers a safeguarding risk is present, a risk assessment will be prepared, along with a preventative supervision plan. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned.

More detailed information on the systems in place to support victims, perpetrators and any other pupils affected by child on child abuse as well as the processes for recording and investigating instances can be found in the School's Anti-Bullying Strategy, E-Safety Policy and Policy on Sexual Violence and Sexual Harassment.

Creating a supportive environment in School and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;
- Even in the context of a single sex School, vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent;
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in Section 5.10);
- Ensure staff reassure victims that they are being taken seriously;
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that

should be shared with safeguarding partners;
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed;
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports;
    - That even if there are no reports of child-on-child abuse in School, it does not mean it is not happening – staff should maintain an attitude of "it happens here", and
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to;
        - A friend may make a report;
        - A member of staff may overhear a conversation, and
        - A child's behaviour might indicate that something is wrong

    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy;
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it;
    - That they should speak to the DSL if they have any concerns, and
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this, and
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

5.9 Sharing of nudes and semi-nudes ('sexting')

Staff responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a

child or young person, the incident may first present as a child-on-child incident. See Appendix 2 for more information on assessing adult-involved incidents;

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs);
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the images or videos is under 13, and
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Dedicated Ward Officer:
PC Sriranganathan Email - Kreean.Sriranganathan@met.police.uk
Or by dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in Section 13 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and PSHE programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is;
- How it is most likely to be encountered;
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- Issues of legality, and
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images, and
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the School will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first;
- Approaching from the perspective of the child;
- Promoting dialogue and understanding;
- Empowering and enabling children and young people;
- Never frightening or scare-mongering, and
- Challenging victim-blaming attitudes.

5.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
To achieve this, we will:

- Put systems in place for pupils to confidently report abuse;
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils, and
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Pupils are reminded at the start of each term of the reporting process for all concerns and the key personnel to speak to. There are regular reminders throughout the year in tutor time, assemblies and PSHE lessons.
Pupils also have access to 'Student Concern Forms' which allow pupils to raise concerns anonymously. Pupils are encouraged to report concerns to either their form teacher or any other member of staff.
Staff are trained to reassure pupils making a report that their concern will be taken seriously and acted upon in a timely manner.

Section 6: Online Safety and the use of mobile technology

The use of technology has become a significant component of many safeguarding issues with many pupils having unlimited access to the internet. We recognise the fact that, as all pupils are required to bring their own device (laptop or equivalent) to School, they will have more opportunities to access the internet on site. This access means that some pupils may, whilst at School, sexually harass their peers, share indecent images (consensually or non-consensually) and view and share pornography and harmful content. Furthermore, technology often provides the platform that facilitates harm in the form of child sexual exploitation, radicalisation or sexual predation. Such issues may be categorised into four areas:

- **Content**: being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories;
- **Contact:** being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying, and
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

To address this, our School aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors;
- Protect and educate the whole School community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones');
- Set clear guidelines for the use of mobile phones for the whole School community, and
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

We take a whole School approach to online safety to protect and educate pupils and staff in their use of technology and have robust mechanisms to identify, intervene and escalate any concerns that may arise. Our approach is set out in detail in our Staff Code of Conduct, E-Safety Policy (including Acceptable Use Policy for Pupils) and Policy on Sexual Violence and Sexual Harassment

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

- Use Smoothwall filtering and monitoring systems to prevent exposure to inappropriate content or harmful media;
- Require pupils in Pre-Senior, KS3 and KS4 to hand in their mobile phones at the start of the School day and all pupils to sign an acceptable use agreement. 6th Formers are able to access 3G/4G/5G in the sixth form area; they are given advice about appropriate use in School and how to report a concern if they receive any inappropriate messages or images;
- Remind pupils in Pre-Senior to Year 11, who bring in devices as part of Bring Your Own Device (BYOD) initiative, that they are only to be used for educational purposes under staff supervision and must be stored in lockers or bags during unsupervised time;
- Give pupils guidance on safe use of the web (including anti-bullying) through the PSHE curricula and in year group assemblies. Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Strategy and procedures, and
- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology;
    - Keeping personal information private;
    - How to recognise unacceptable behaviour online, and
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

We are mindful of the fact that chat rooms and social networking sites are higher risk sources of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home.

Further actions (Staff):

- Staff are trained, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year;
- As part of the safeguarding training programme, online safety training for staff is updated regularly in the form of bulletins and INSET, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively;
- Staff are made aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to School for their own use, but will limit such use to non-contact time when pupils are not present, and
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras.

Further actions (Parents):

- The School runs parent seminars to help parents understand the possible risks, and
- Educates parents about online safety via our website and communications sent directly to them and during parents' evenings. We will also share procedures with them so they know how to raise concerns about online safety.

Pupils, parents, staff, volunteers and governors sign an agreement regarding the acceptable use of the internet in School, use of the School's ICT systems and use of their mobile and smart technology. We will explain the sanctions if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.

We put in place robust filtering and monitoring systems to limit pupils' exposure to the 4 key categories of risk (described above) from the School's IT systems.

We ensure that all staff, pupils and parents are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.

An annual review of online safety is undertaken, supported by a risk assessment that considers and reflects the risks faced by our School community and the control measures needed to protect our School community.

We review the Safeguarding and Child Protection policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

We recognise that pupils with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime (cybercrime). If there are concerns about a child in this area, the DSL (or a deputy), will consider referring into the Cyber Choices programme and follow procedures set out in our safeguarding policies.

This section summarises our approach to online safety and mobile phone use. For full details about our School's policies in these areas, please refer to our E-Safety Policy (including Acceptable Use Policy for pupils).

6.1 Artificial intelligence (AI)

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

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

More House School will treat any use of AI to access harmful content or bully pupils in line with this policy, our policy on artificial intelligence and Anti-bullying Strategy.

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

Section 7: Notifying parents or carers

The School will normally seek to discuss any concerns about a child with their parents and provide contact details of the relevant local authority. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care. This is also subject to advice from the LSCP if the allegation involves a member of staff.

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

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

- Meet with the victim's parents or carers and with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

Section 8: Children with SEN, disabilities or health conditions

Children with SEND or disabilities or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. They have a higher risk of being left out, of being isolated from their peers and they are disproportionately affected by bullying (including prejudice-based bullying).

Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assuming that indicators of abuse (eg behaviour, mood and injury) relate to the child's condition without further exploration;
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils;
- The potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges, and
- Lack of cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School and the consequences of doing so.

The School has a significant proportion of pupils with SEND who are supported by their form tutor and the SENCO. In order to ensure that they are appropriately supported, the DSL attends the Department for Support for Learning departmental meetings and liaises with form tutors during pastoral team meetings.

For particularly vulnerable members of our School community, the DSL will carry out a risk assessment which responds to the potential risk to the pupil in School and outside, for example, travelling to and from School.

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

- One to one meetings with the Form tutor;
- Support from the School counsellor, and
- Regular review meetings with parents.

Any reports or concerns involving pupils with SEND will require close liaison with the DSL (or deputies) and the SENCO.

Section 9: Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's

experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks, and
- The provision of pastoral and/or academic support.

Section 10: Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- The DSL has details of children's social workers and relevant Virtual School Heads.

We have appointed an appropriately trained teacher, Mr J Roberts (SENCO), to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

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

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to, and
- Work with Virtual School Heads to promote the educational achievement of looked-after and previously looked-after children.

Section 11: Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our Behaviour and Discipline Policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Concerns should always be reported to the DSL or a Deputy.

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

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

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

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

Section 12: Complaints and concerns about School safeguarding policies

12.1 Complaints against staff

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

12.2 Other complaints

The School's complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. The Complaints Policy is available to all parents, pupils and staff via the School Policies page of the School's website.

Complaints from staff are dealt with under the School's complaints and disciplinary and grievance procedures.

The procedure in Appendix 3 will apply if there is an allegation that a teacher or other member of staff or volunteer or contractor 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, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

Low level concerns, which do not meet the criteria outlined above, should be reported to the Head as outlined in Appendix 3.

What to do if you have concerns about safeguarding practices
All staff and volunteers should feel able to raise concerns about poor or unsafe practice or safeguarding failures. All concerns will be taken seriously by the Senior Leadership Team.

If staff do have concerns about safeguarding practices they should follow the **Whistle Blowing procedures** (available in the staff handbook and on the School website).

12.3 Whistleblowing

The **whistleblowing procedures are** available in the staff handbook and on the School website (see Employee Handbook - Public Interest Disclosure – Whistleblowing).

Section 13: Record-keeping

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

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

Records will include:

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

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

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

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

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

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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

Records are held on CPOMS and can be transferred directly to schools using the same safeguarding software.

Only the DSL and DDSLs have access to the CPOMS Safeguarding files through a two factor security password setting.

Our data protection policy (Employee Handbook – Section E) sets out further information on the retention of documents and records. Access to these documents is limited to nominated staff and

they are only shared on a need to know basis.

In addition:

- Our Safer Recruitment Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

Section 14: Training

14.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-School safeguarding approach and wider staff training, and curriculum planning;
- Be in line with advice from the 3 safeguarding partners;
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring, and
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment, and
    - Have a clear understanding of the needs of all pupils.

All staff will have training on the government's Anti-Radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

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

Volunteers will receive appropriate training, if applicable.

Induction for new staff

As part of the induction procedure for new staff, the following topics will be covered and copies of the relevant policies provided:

- Safeguarding and Child Protection Policy (including the policy and procedure for dealing with child-on-child abuse);
- Safer Recruitment Policy
- E-Safety Policy;
- Role and identity of the DSL and Deputies;
- KCSIE part one and Annex B;
- Behaviour and Discipline Policy (including measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying;
- Attendance Policy including Children missing from Education; and
- The Staff Code of Conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships, the low-level concerns policy and communications including the use of social media).

14.2 The DSL and Deputies

The DSL and deputies will undertake child protection and safeguarding training at least once every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

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

14.3 Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge, and
- Can be assured that safeguarding policies and procedures are effective and support the School to deliver a robust whole-School approach to safeguarding.

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

14.4 Recruitment – interview panels

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

See our Safer Recruitment Policy for further details.

14.5 Staff who have contact with pupils and families

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

Section 15: Monitoring and Review

Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Governors. Where an incident involves a member of staff, social services will assist in this review to determine whether any improvements can be made to the School's procedures. In addition, the DSL will ensure that this policy is reviewed annually and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary.

The Governors will undertake an annual review of this policy and its procedures including checking for good cooperation with local agencies and assuring themselves of the efficiency with which the relevant duties have been discharged.

The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

Section 16: Confidentiality and Sharing Information

The Governing Board will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and GDPR.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved, but also because it being released into the public domain might compromise evidence.

Staff should only discuss concerns with the DSL, a deputy DSL, the Head or Chair of Governors (depending on the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. This point relates to the School's Data Protection Policy.

The School will cooperate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2023. Safeguarding records are requested from feeder Schools of all new pupils using a pro-forma letter (see Appendix 8). Likewise, the School will pass on relevant safeguarding records when pupils move to a new School.

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

Safeguarding Concern Forms and other written information will be stored electronically on CPOMS, and any electronic information will be password protected and only made available to relevant individuals.

However, in appropriate circumstances, the School recognises that it must share information with the appropriate persons. The School recognises that:

- Timely information sharing is essential to effective safeguarding;
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:
    - it is not possible to gain consent;
    - it cannot be reasonably expected that a practitioner gains consent; or
    - to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- If a victim asks the School not to tell anyone about the sexual violence or sexual harassment:

    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies;
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children,
    - The DSL should consider that:
        - Parents or carers will normally be informed (unless this would put the victim at greater risk);
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved, and
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputies), and
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 12, and allegations of abuse against staff in Appendix 3.

Section 17: Related policies

The following documents are available via the Staff Handbook on the staff shared drive. Those available to parents are on the web-site:

- AI Policy
- Anti-Bullying Strategy;
- Attendance Policy (including registration and missing pupil procedure);
- Bereavement Policy;
- Careers Policy;
- Complaints Policy;
- Data Protection Procedure;
- Drugs Policy;
- Equity, Diversity and Inclusion Policy.
- E-Safety Policy (including Acceptable Use Policy for Pupils);
- Health and Safety Policy;
- Critical Incidents Policy;
- PE Code of Conduct;
- **Allegations against a member of staff (including supply teachers, volunteers or contractors) including low-level concerns policy** (Appendix 3 - Safeguarding and Child Protection Policy);
- Public Interest Disclosure ("Whistleblowing") Policy;
- Relationships and Sex Education (RSE) Policy;
- Remote Learning Policy;
- Safer Recruitment Policy;
- Sexual Violence and Sexual Harassment Policy;
- Pupil Mental Health and Wellbeing Policy;
- Special Educational Needs and Disability (SEND) Policy;
- Staff Code of Conduct;
- Staff Wellbeing Policy;
- Use of Force to Restrain/Control Pupils and Physical Contact with Pupils Policy (Appendix 9 - Behaviour and Discipline Policy);

Appendix 1: Types of abuse

This appendix is based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025.

Abuse, including neglect, and safeguarding issues is rarely a standalone event that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries or show signs of pain or discomfort;
- Keep arms and legs covered, even in warm weather, be concerned about changing for PE or swimming; look unkempt and uncared for;
- Change their eating habits;
- Have difficulty in making or sustaining friendships; appear fearful;
- Be reckless with regard to their own or other's safety; self-harm;
- Frequently miss School or arrive late; show signs of not wanting to go home;
- Display a change in behaviour;
- Go from quiet to aggressive, or happy-go-lucky to withdrawn; challenge authority;
- Become disinterested in their School work; be constantly tired or preoccupied;
- Be wary of physical contact;
- Be involved in, or particularly knowledgeable about drugs or alcohol, or/and
- Display sexual knowledge or behaviour beyond that normally expected for their age.

The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSIE 2025. At More House we encounter all four kinds of abuse, but children whose parents work long hours and are unsupervised before and after School are particularly vulnerable to neglect and teachers should be aware of this and report any concerns to the DSL.

A. Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

B. Emotional abuse

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

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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;
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another, and
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

C. Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing, and/or
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse 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 in education and **all** staff should be aware of it and of their School or college's policy and procedures for dealing with it.

D. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers), or
- Ensure access to appropriate medical care or treatment.

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

Appendix 2: Specific Safeguarding Concerns

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

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

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

Sexually motivated incidents

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

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

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

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

- Contacted by an online account that they do not know but appears to be another child or young person;
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images;
- Moved from a public to a private/E2EE platform;
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes;
- Offered something of value such as money or gaming credits, and/or
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them;
- Use images that have been stolen from the child or young person taken through hacking their account, and/or
- Use digitally manipulated images, including AI-generated images, of the child or young person.

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

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

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person;
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first;
- Moved from a public to a private/E2EE platform;
- Pressured into taking nudes or semi-nudes;
- Told they have been hacked and they have access to their images, personal information and contacts, and/or
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

All staff should have awareness of safeguarding issues that can put children at risk of harm.

A. Children who are absent from education
B. Child Criminal Exploitation (CCE) & Child Sexual Exploitation (CSE)
C. Child-on-Child Abuse
D. Children in the Court System
E. Children with Family Members in Prison
F. Domestic Abuse, Drugs and Alcohol Abuse
G. Fabricated or Induced Illness
H. Abuse of Trust and Inappropriate Relationship
I. Faith Abuse
J. Female Genital Mutilation (FGM), Forced Marriage and Honour Based Abuse
K. Gang Related Violence
L. Homelessness
M. Mental Health
N. Preventing Radicalisation
O. Sexual Violence and Sexual Harassment Between Children
P. Serious Violence
Q. Private Fostering
R. Sexting
S. Trafficking
T. Upskirting
U. County Lines
V. Child Abduction and Community Safe Incidents
W. Checking the Identity and Suitability of Visitors
X. Non-collection of Children
Y. Missing Pupils

A. Children who are absent from education

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

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

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Cease to attend a School, and/or
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are

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

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

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

All pupils will be placed on admission and attendance registers as required by law.
We will inform the LSCP of any child removed from our admission register. We will inform the LSCP of any pupil who fails to attend for a continuous period in line with local guidelines. The School has more than one emergency contact number for each pupil.

B. Child Criminal Exploitation (CCE)

Some of the following can be indicators of CCE:

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

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

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

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

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

C. Child Sexual Exploitation (CSE)

CSE is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial or other advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

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

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Teenage girls are particularly vulnerable to child sexual exploitation and staff should be vigilant and report any concerns to the DSL immediately. The DSL will investigate any concerns and make a referral as necessary.

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

D. Child-on-Child abuse

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse');
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in Section 5 of this policy, as appropriate. In particular, section 5.8 and 5.9 set out more detail about our School's approach to this type of abuse.

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

The School actively engages with its local partners in relation to child-on-child abuse, and works closely with the LSCP (Royal Borough Kensington and Chelsea/ Westminster) and other relevant agencies.

E. Children in the Court System

Children are sometimes required to give evidence in court, either because they have been a victim of crime or have witnessed a crime taking place. If a pupil at More House School is required to go to court, the DSL will support this pupil using the child arrangements information tool produced by the Ministry of Justice. The pupil may need support from the School's counsellor and the DSL will arrange this if required.

F. Children with family members in prison

Children with a family member in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. If a pupil at More House School has a family member in prison, the DSL will support this pupil using guidance from The National Information Centre on Children of Offenders. The pupil may need support from the School's counsellor and the DSL will arrange this if required.

G. Domestic Abuse, Drugs and Alcohol abuse

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

- Psychological;
- Physical;
- Sexual;
- Financial, and
- Emotional.

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL before the child or children arrive at School the following day (Operation Encompass).

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

Exposure to domestic abuse can have a serious, long lasting, emotional and psychological impact on children. Children who are exposed to domestic abuse, drug or alcohol abuse are themselves at greater risk to abuse, particularly neglect. If staff have concerns of this nature about the home life of a pupil, they should report to the DSL straight away who will investigate and make a referral if necessary.

H. Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

A high absence rate from School is an indicator of FII, especially if the child does not appear to be ill or have symptoms of their illness at School.

If you have concerns of this nature you should not speak to the parent directly about this. Please report to the DSL who will investigate and make a referral if necessary.

I. Abuse of trust and inappropriate relationship

All School staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The School's Staff Code of Conduct separately sets out expectations of teaching and support staff.

J. Faith Abuse

Faith and belief-based child abuse, including practices around 'spirit possession' and 'witchcraft', is a hidden crime and police believe that this kind of abuse is under-reported in London.

Faith Abuse can be separated into five different areas;

- Abuse as a result of a child being accused of being a 'witch';
- Abuse as a result of a child being accused of being possessed by 'evil spirits';
- Ritualistic abuse which is prolonged sexual, physical and psychological abuse;
- Satanic abuse which is carried out in the name of 'Satan' and may have links to cults, and
- Any other harmful practice linked to a belief or faith.

If you have concerns of this nature you should not speak to the parent directly about this. Please report to the DSL who will investigate and make a referral if necessary.

K. So-called 'honour-based' abuse (including FGM (Female Genital Mutilation) and Forced Marriage.

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

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

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

FGM

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

Section 5.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/pupil already being known to social services in relation to other safeguarding issues, and
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable;
    - Finding it hard to sit still for long periods of time (where this was not a problem previously);
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating;
    - Having frequent urinary, menstrual or stomach problems;
    - Avoiding physical exercise or missing PE;
    - Being repeatedly absent from School, or absent for a prolonged period;
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
    - Being reluctant to undergo any medical examinations;
    - Asking for help, but not being explicit about the problem, or
    - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues, or
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM;
    - Having limited level of integration within UK society;
    - Confiding to a professional that she is to have a "special procedure" or to attend a

special occasion to “become a woman”;
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period;
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
- Being unexpectedly absent from School;
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place;
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk, and
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or School counsellor, as appropriate.

K. Gang Related Violence

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations. There are lots of reasons why young people feel the pressure to join gangs. They might be bored and looking for excitement or feel attracted to the status and power it can give them. They might join due to peer pressure, money or family problems. Gang membership can also make a child feel protected and that they belong.

If you suspect that a pupil is involved in or thinking of joining a gang, report concerns to the DSL using a Safeguarding Concern Form immediately. The DSL will investigate and then contact social services if necessary.

L. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

If you have concerns that a child is homeless or at risk of homelessness, report them immediately to the DSL, who will investigate and contact social services if necessary.

M. Mental Health

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, teachers and particularly form tutors and class teachers see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate a problem. Children can develop mental health problems when difficult events happen in their lives:

- Loss or separation – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted;
- Life changes – such as the birth of a sibling, moving house or changing Schools or during transition from primary to secondary School, or secondary School to sixth form. Exam pressures, and
- Traumatic events such as abuse, domestic abuse, bullying, violence, accidents, injuries or natural disaster.

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

Schools should be mindful that some groups of children are more vulnerable to mental health difficulties than others. These include, but are not limited to, looked after children, children with learning difficulties, children on the autism spectrum and children from disadvantaged backgrounds.

Indicating factors

- Confused thinking;

- Prolonged depression (sadness or irritability);
- Feelings of extreme highs and lows;
- Excessive fears, worries and anxieties;
- Social withdrawal;
- Dramatic changes in eating or sleeping habits;
- Strong feelings of anger; and
- Strange thoughts (delusions).

School should be a safe and affirming place for children where they can develop a sense of belonging and feel able to trust and talk openly with adults about their problems. Safeguarding training at More House enables staff to identify possible mental health problems. All concerns about a pupil's mental health or wellbeing (which constitute a safeguarding concern) should be reported directly to the DSL. The DSL will, as appropriate and in consultation with the pupil, parents and pastoral team (including the Mental Health Lead) decide on the next course of action. This may involve the engagement of early help resources within School (such as the School counsellor) or outside agencies.

N. Preventing Radicalisation

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation:

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

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

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

Terrorism is an action that:

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

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

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

We will assess the risk of children in our School being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- Becoming susceptible to conspiracy theories and feelings of persecution;
- Changes in friendship groups and appearance;
- Rejecting activities they used to enjoy;
- Converting to a new religion;
- Isolating themselves from family and friends;
- Talking as if from a scripted speech;
- An unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- Accessing extremist material online, including on Facebook or Twitter;
- Possessing extremist literature, or
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

If staff are concerned about a pupil, they will follow our procedures set out in Section 5.5 of this policy, including discussing their concerns (including online concerns) with the DSL.

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

Our School, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead. The SPOC for More House School is the DSL (Suzanne Della-Porta). The responsibilities of the SPOC are described in Appendix 7.

The School or individuals may also contact the local Prevent Schools Officer:

Simone Torry (Prevent Education Officer)
07554 222610
simone.torry@lbhf.gov.uk

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the Single Point of Contact (SPOC) and/or use the Safeguarding Concern Form. Training on Prevent-related issues can be accessed by contacting either the SPOC or Prevent Schools Officer (see contact above).

O. Sexual Violence and Sexual Harassment between Children in Schools

Sexual violence refers to rape, assault or initiation/hazing type violence and sexual harassment includes sexual comments, jokes, physical behaviour such as deliberately brushing up against someone, sexting and upskirting. We acknowledge through the 'Everyones Invited' website and Ofsted's report that sexual violence and sexual harrassment is prevalent in Schools and we take an active approach to develop a culture where such behaviours are not accepted.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex;
- Through a group of children sexually assaulting or sexually harassing a single child or group of children, and
- Online and face to face (both physically and verbally).

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

Children who are victims of sexual violence and sexual harassment will likely find the experience 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.

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them;
- Regularly review decisions and actions, and update policies with lessons learnt;
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns;
- Consider if there are wider cultural issues within the School that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again, and
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up, 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.

At More House we take a whole School approach to this issue and we raise awareness of inappropriate behaviour through the PSHE and RSE curriculum. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Due to the nature of our School community the risk of sexual violence and sexual harassment may appear low but the School takes the view that 'it could happen here' and recognises that a lack of reported incidents may mean that some instances in fact go unreported.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in Section 5 of this policy, as appropriate. In particular, Section 5.8 and 5.9 set out more detail about our School's approach to this type of abuse.

The DSL will take action on any concerns of this nature in accordance with the procedures outlined in Sexual Violence and Harassment policy.

P. Serious Violence

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

- Increased absence from School;
- Change in friendships or relationships with older individuals or groups;
- Significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries, or
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation - see above).

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

- Being male;
- Having been frequently absent or permanently excluded from School;
- Having experienced child maltreatment, and
- Having been involved in offending, such as theft or robbery.

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

Q. Private Fostering

- A private fostering arrangement is one that is made privately (without the involvement of the LSCP) 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 relative 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 grandparents or cousins.
- Parents and private foster carers both have a legal duty to inform the relevant LSCP 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 LSCP, particularly when the child has come from another country.
- In some cases, privately fostered children are affected by abuse and neglect, or may be involved in trafficking, child sexual exploitation or modern-day slavery.
- We will have a mandatory duty to report to the LSCP where they are aware or suspect that a child is subject to a private fostering arrangement. Although Schools have a duty to inform the LSCP, 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 that they are aware of their duty to inform the LA. The School itself has a duty to inform the LSCP of the private fostering arrangements.

R. Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

Sexting may also be called trading nudes, dirties or pic for pic.

Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend;
- Share an explicit image or video of a child, even if it's shared between children of the same age, or
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

Further information can be found in Section 5.9 of this policy.

If you discover or suspect that a child has been involved in sexting, report your concern to the DSL as soon as possible using CPOMs and they will take action in accordance with our safeguarding policies as appropriate.

T. Upskirting

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

If you discover or suspect that a child has been involved in upskirting, report your concern to the DSL as soon as possible using the Safeguarding Concern Form and they will take action in accordance with our safeguarding policies.

U. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including Schools, further and higher educational institutions, pupil referral units, special educational needs Schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines is missing episodes (both from home and School), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

If you discover or suspect that a child has been involved in county lines, report your concern to the DSL as soon as possible using the Safeguarding Concern Form and they will take action in accordance with our safeguarding policies.

V. Child Abduction and Community Safe Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone

with legal responsibility for the child. It 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.

As part of the PSHE programme the School offers practical advice to pupils on how to keep themselves safe. The School also engages the local Schools Safe Team to provide advice, resources and talks on related topics (including consent).

Any concerns relating to community safe incidents should be reported to the DSL as soon as possible and action taken in accordance with our safeguarding policies.

W. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID, or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

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

Further information is available in the Visitors and visiting speakers policy.

X. Non-collection of children

If a pupil is not collected at the end of the session/day, we will:

- Inform a senior member of staff;
- Never allow a pupil to leave on their own until it has been established that it is safe to do so;
- Ensure that the pupil is safe and temporary supervision is in place;
- Attempt to make contact with the pupil's parents/carers;
- Check that other arrangements have not been made (such as going home with another parent), and/or
- Attempt to make contact with alternative or emergency contacts kept on file.

Y. Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the procedures stated in the Absence Policy.

Appendix 3 - Allegations against a member of staff (including supply teachers, volunteers or contractors) including low-level concerns policy.

Section 1: Allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of School

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Head, or the Chair of Governors where the Head is the subject of the allegation. The case manager will be identified at the earliest opportunity.

If the Chair of Governors believes there to be a conflict of interest, in the case of the Head being subject to the allegation, the Chair of Governors should refer the case directly to the LADO before leading the investigation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the School premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the School so that they do not have unsupervised access to children, and

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

If in doubt, the case manager will seek views from the School's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and to prove there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below;
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the School is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care;
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the School and their contact details;
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in School and/or liaise with the police and/or children's social care services as appropriate;

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Other support may, for example, include access to counselling, medical advice or support from a colleague;

- Inform the parents or carers of the pupil/pupils involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;
- Keep the parents or carers of the pupil/pupils involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member), and
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the School will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the School's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns about or an allegation is made against someone not directly employed by the School, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome;
- The Head will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the School, while the School carries out the investigation;
- We will involve the agency fully, but the School will take the lead in collecting the necessary information and providing it to the LADO as required, and
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within one week;
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within three working days, and
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children’s social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the School will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the School will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the School.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL in consultation with the Head, will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate, or
- Shown to be deliberately invented, or malicious, the School will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate, or
- Shown to be deliberately invented, or malicious, the School will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation, and
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- Notes of any action taken, decisions reached and the outcome, and
- A declaration on whether the information will be referred to in any future reference

In these cases, the School will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious, or
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the School's procedures or practice to help prevent similar events in the future.

Generally, the review will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff;
- The duration of the suspension;
- Whether or not the suspension was justified, and
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the School that they were abused as a child, we will advise the individual to report the allegation to the police.

Staff Disciplinary Policy and Procedure

Further details including how the School deals with and processes reports and allegations and the appeals process is available in the

- Staff Disciplinary Policy and Procedure (Employee Handbook) and
- Staff Code of Conduct

Section 2: Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in Section 1 of Appendix 3 above.

Concerns may arise through, for example:

- Suspicion;
- Complaint;
- Safeguarding concern or allegation from another member of staff;
- Disclosure made by a child, parent or other adult within or outside the School, and
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the School may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children;
- Having favourites;

- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, and
- Humiliating pupils.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Empowering staff to share any low-level concerns as per Section 5.7 of this policy, whether in or outside of work, and including safeguarding matters which happen online;
- Empowering staff to self-refer;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised, and
- Helping to identify any weakness in the School's safeguarding system.

We regularly remind staff at inset training, safeguard briefings and through email updates of the procedure on reporting concerns.

The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Information will be shared on a need to know basis only.

Responding to low-level concerns

If the concern is raised via a third party, the Head will collect evidence where necessary by speaking:

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

The Head will use the information collected to categorise the type of behaviour and determine any further action, in line with the School's policy on Behaviour and Discipline. The Head will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR;
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold we will refer it to the LADO, and
- Retained at least until the individual leaves employment at the School.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 4 - Safeguarding and Child Protection Training Disclaimer

Confirmation of:

- **having received, read and understood the Safeguarding and Child Protection Policy and associated policies listed below, and**
- **having attended New Staff Safeguarding Induction Training/Annual Safeguarding Update Training (as applicable)**

- I confirm that I have received, read and understand the School's Safeguarding and Child Protection Policy;
- I confirm that I have read and understand part one and Annex B of Keeping Children Safe in Education (2025);
- I confirm that I have read and understand the School's Staff Code of Conduct;
- I confirm that I have read and understand the School's Whistleblowing Policy
- I confirm that I have read and understand the School's Policy on Behaviour and Discipline.
- I confirm that I have read and understand the School's Attendance Policy (Children Missing from Education);
- I confirm that I have read and understand the School's E-Safety Policy (Including acceptable use policy for pupils);
- I confirm that I know who the DSL and deputy DSLs are at More House School;
- I confirm that I attended New Staff Safeguarding Induction Training/Annual Safeguarding Update Training* (*delete as applicable)

Staff Name:	
Staff Signature:	
Date:	
DSL Signature:	
Date:	

Please sign and return this form to the Designated Safeguarding Lead

Appendix 5 - Safeguarding Concern Form

Form for reporting and recording concerns about a pupil
Safeguarding Concern Form
Please complete this form if you have any concerns about a pupil

Pupil Name			
Day/Date/Time		DoB	
Member(s) of staff noting concern			

Concern (Please describe as fully as possible)   Signature: Date:

Actions taken will be recorded on CPOMS and shared with the member of staff reporting if appropriate.

Please pass this form in a sealed envelope to the Designated Safeguarding Lead when completed. This form should be completed on the day that you are made aware of the concern and please use full names when referring to pupils and staff.
Note: Concerns or allegations relating to a member of staff should be reported directly to the Head

Appendix 6 - Student Concern Form

Student Concern Form

This form can be used to report any concerns that you might have (for example bullying, abuse or neglect) about yourself or someone else. Your report will be read and taken seriously.

Instructions: Please complete the form responding only to the questions that you feel comfortable answering and are able to accurately answer. You may choose to include your name (which will be confidential) at the bottom of the form or you may submit it anonymously. Please note that the School's ability to investigate an anonymous complaint may be limited.

Once completed, hand in or email the form to:

Ms Della-Porta (csdella-porta@morehousemail.org.uk), or
Mr Keeley (keeley.head@morehousemail.org.uk), or
Ms Phelps (cphelps@morehousemail.org.uk), or
Another member of staff.

Describe what happened/what is happening:
When did it happen?
Where did it happen?
Who was involved in the incident?

Who was the target of the incident?

Did anyone else witness the incident (if yes, please list)?
Were you or others physically hurt (please explain)?
Was there damage to anyone’s personal property?
Have you or the target missed any School or made any changes to your daily routine as a result of the incident(s)?
Have you told anyone about the incident?
Have you previously filed a report (this information is used to determine if retaliation is occurring)?
What action would you like the School to take?
Your Name (optional & confidential):

Appendix 7 - The Role of the SPOC

Preventing Violent Extremism - Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC for More House School is Suzanne Della-Porta, who is responsible for:

- Ensuring that staff of the School are aware that he is the SPOC in relation to protecting pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the School in relation to protecting pupils from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the School's RS curriculum, PSHE policy and RSE policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the School about the safeguarding processes relating to protecting pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the School for case discussions relating to pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of susceptible pupils into the Channel process (if consent is obtained from that pupil); and
- Accessing and using additional support such as that provided by the Department for Education (Protecting Children from Radicalisation).

Appendix 8 - Pupil Transfer Letter

Letter requesting SAFEGUARDING and CHILD PROTECTION information for new pupils:

Dear Sir/Madam,

On behalf of More House School, I would be grateful to receive any safeguarding and child protection records for the following named pupil(s):

Name(s)

I would be grateful if you could also forward any disclosures of, or welfare concerns related to:

- Self harming behaviour and disordered eating;
- Involvement in bullying;
- Mental Health;
- Acrimonious family relations, and
- Referrals to Child Social Services.

Please could you send these safeguarding and child protection records in a sealed envelope marked 'Strictly Confidential' for my attention.

If there are any particular concerns or needs, of which we need to be aware, please contact me at sdella-porta@morehousemail.org.uk or by telephone on 020 7235 2855.

Thank you in advance for your assistance.

Yours sincerely,

Suzanne Della-Porta
Designated Safeguarding Lead

Appendix 9 - Alternative Provision

As we have limited sports facilities in School we use alternative facilities to provide a broad and balanced PE and extra-curricular programme. This activities take place at the following venues:

1. Enable Leisure and Culture, Battersea Park Millennium Arena - bookings contact; Fabio Gouveia fgouveia@enablelc.org
2. Enable Leisure and Culture, Battersea Park Astro Pitches - bookings contact; Richard Larkin rlarkin@enablelc.org
3. Continental Landscapes, Battersea Park Grass Pitches - bookings contact; Pooja Wandsworthsports@continental-landscapes.co.uk
4. Fulham Reach Boat House, Rowing - bookings contact; Alastair Horne alastair@fulhamreachboatclub.com
5. PFP Leisure, Latchmere Leisure Centre - bookings contact; Sam Glassett SamGlassett@pfpleisure.org

Before allowing the girls to take part in activities at these venues we obtain written confirmation that the individuals employed by the alternative provider adhere to safer recruitment policies.

Girls are escorted to the venues and supervised by members of staff, who will report any concerns to the DSL.

Residential Trips

During Activities Week, pupils visit various activity centres around the UK. As part of the safeguarding procedures trip leaders are required to obtain written confirmation that staff employed by the alternative provision provider adhere to safer recruitment policies