



Emanuel School

Safeguarding and Child Protection Policy

2024-25

Safeguarding and Child Protection Policy

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SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child.

Any safeguarding concern must be raised with the designated safeguarding lead or deputies without delay. Alert a member of the safeguarding team in person, via reception on 020 8870 4171 or on email at safeguarding@emanuel.org.uk.

In the event of a safeguarding concern which occurs in **out-of-school-hours** or **during the holidays**, a member of the safeguarding team can be contacted at 020 8150 1362.

Designated Safeguarding Lead (DSL)		
Ravi Kothakota Deputy Head: Pupils	ravi.kothakota@emanuel.org.uk 020 8875 6929	
Deputy Designated Safeguarding Leads (Deputy DSLs)		
Julia Johnson Head of Sixth Form	julia.johnson@emanuel.org.uk 020 8870 4171	
Naomi Carpenter-Merritt Deputy Head of Sixth Form	naomi.carpenter@emanuel.org.uk 020 8870 4171	
Joanna McIsaac Head of Middle School	joanna.mcisaac@emanuel.org.uk 020 8870 4171	
Rachel Chetwood Head of Lower School	rachel.chetwood@emanuel.org.uk 020 8870 4171	
Mary Galbraith Director of Safeguarding	mary.galbraith@emanuel.org.uk 020 8870 4171	

The DSL or a Deputy DSL should always be available to discuss safeguarding concerns. If, in exceptional circumstances, the DSL or Deputy DSLs are not available, staff should not delay in taking appropriate action. Staff should consider talking to the **headmaster** and / or taking advice from the school's local children's social care at MASH. In these circumstances, any action taken should be shared with the DSL (or a Deputy DSL) as soon as practically possible.




Headmaster		
Robert Milne	robert.milne@emanuel.org.uk 020 8870 4171	

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care at **MASH** Multi-Agency Safeguarding Hub (and **if appropriate the police**) should be made immediately. Anyone can make a referral to children's social care.

Staff members should ensure they are prepared for the referral with clear details of their concern and certain information about the child including their name, date of birth, address and contact details for parents/carers, as well as information about the child's developmental needs and the child's family and siblings. There is no need for parental consent for referrals to statutory agencies.

MASH	
Weekdays 9am – 5pm	mash@wandsworth.gov.uk 020 8871 6622
Out of hours	020 8871 6000
Multi-Agency Referral Form (MARF)	Referral to the Wandsworth MASH



Governor Contact Details

Chair of Governors		
Markus Jaigirder	markus.jaigirder@emanuel.org.uk	
Nominated Governor for Safeguarding and Child Protection		
Robin Fry (Lead Nominated Governor for Safeguarding and Child Protection)	robin.fry@emanuel.org.uk	
Ms Tara Lyons (Deputy Nominated Governor for Safeguarding and Child Protection)	tara.lyons@emanuel.org.uk	
United Westminster Schools Foundation	020 7828 3055	

Key External Contact Details

The school works closely with Wandsworth Safeguarding Children Partnership to ensure concerns about a child are dealt with in accordance with locally agreed inter-agency procedures.

Wandsworth Safeguarding Children Partnership (WSCP)	
www.wscp.org.uk 020 8871 7401 wscp@richmondandwandsworth.gov.uk	
Iain Low Assistant Director – Social Work with Families	iain.low@richmondandwandsworth.gov.uk
WSCP Safeguarding Standards Service	
Louise Jones Assistant Director – Practice Standards and Principal Social Worker	louise.jones@richmondandwandsworth.gov.uk
Sophie Allen Education Safeguarding Lead	07866 956554 sophie.allen@richmondandwandsworth.gov.uk
Anita Gibbons Local Authority Designated Officer (LADO)	0208 871 5188 (office) 07974 586461 (mobile) anita.gibbons@richmondandwandsworth.gov.uk lado@wandsworth.gov.uk
Joanne Loveless Social Workers in Schools - Team Manager	joanne.loveless@richmondandwandsworth.gov.uk
Mary Scarlett Training and Development Officer - Safeguarding (Schools)	mary.scarlett@richmondandwandsworth.gov.uk
Biddy Macintyre Elective Home Education (EWO)	biddy.macintyre@richmondandwandsworth.gov.uk
Elizabeth Eyoma Children Missing in Education (EWO)	elizabeth.eyoma@richmondandwandsworth.gov.uk
Elizabeth Souter Assistant Director – Children We Care For	elizabeth.souter@richmondandwandsworth.gov.uk
Indeep Sethi Service Manager Safeguarding	indeep.sethi@richmondandwandsworth.gov.uk
Leila Farah Service Manager Family Help	leila.farah@richmondandwandsworth.gov.uk
Sherene Ward Service Manager Family Help (Battersea)	sherene.ward@richmondandwandsworth.gov.uk
Veronica Leigh Service Manger Family Help (Tooting)	veronica.leigh@richmondandwandsworth.gov.uk
Clare Manning Service Manager Family Help (Roehampton)	clare.manning@richmondandwandsworth.gov.uk
Nora Levine Virtual School Headteacher	nora.levine@richmondandwandsworth.gov.uk
Rachel Wright Virtual School Education Co-ordinator for children with allocated social workers	rachel.wright@richmondandwandsworth.gov.uk
Catrinel Ionita Advisory Teacher and Lead for Previously Looked After Children	catrinel.ionita@richmondandwandsworth.gov.uk
Ann Debono School Improvement Manager	ann.debono@richmondandwandsworth.gov.uk
Michael Lewis Police Sergeant: Safer Schools	mike.lewis2@met.police.uk (secondary schools) 07827763149

Mark Holliday Deputy Head of Educational Inclusion and Participation	mark.holliday@richmondandwandsworth.gov.uk
Nateicha McGann Private Fostering	nateicha.mcgann@richmondandwandsworth.gov.uk
Gary Hipple Head of School Support Services and Traded Services	gary.hipple@richmondandwandsworth.gov.uk
Lewis Brunton School Support and Contracts Manager	lewis.brunton@richmondandwandsworth.gov.uk
Miranda Hibbert Vulnerabilities Manager (Stronger and safer Communities)	miranda.hibbert@richmondandwandsworth.gov.uk
Albina Hiorns VAWG Manager	albina.hiorns@richmondandwandsworth.gov.uk
Delores Mambi-Langol Young Carers in School Link	delores@wandsworthcarers.org.uk
Wandsworth Family Information Service - Thrive	
  Family Information Service	thrivewandsworth@richmondandwandsworth.gov.uk Helpline: 9am to 5pm, Monday to Friday 020 8871 7899 Website
Wandsworth Prevent Programme	
Naheem Bashir Hate Crime & Prevent Coordinator	Wandsworth Prevent Programme 07855 971 199 naheem.bashir@richmondandwandsworth.gov.uk
MASH	
MASH Multi-Agency Safeguarding Hub	020 8871 6622 020 8871 6000 (after 5pm weekdays or weekends) mash@wandsworth.gov.uk
Report suspected extremism online	https://www.gov.uk/terrorism-national-emergency/reporting-suspected-terrorism
Report online material promoting terrorism or extremism	https://www.gov.uk/report-terrorism
For non-emergency advice: contact DfE dedicated helpline	020 7340 7264 counter-extremism@education.gsi.gov.uk
Police Liaison	
School Officer	0208 247 8043
Police	999 for emergencies and 101 for non-emergencies
Crimestoppers free phone	0800 555 111 [information may be passed anonymously]
Reporting Abuse in Education	
NSPCC Report Abuse in Education Advice Helpline	0800 136 663 help@nspcc.org.uk
Female Genital Mutilation (FGM)	
Police	www.gov.uk/contact-police
Metropolitan Police Service Project Azure Partnership Team	Tel: 020 7161 2888
NSPCC FGM free phone helpline	0800 028 3550 [information may be passed anonymously]
Whistleblowing	
NSPCC Whistleblowing Advice Line	Weston House, 42 Curtain Road, London EC2A 3NH Tel: 0800 028 0285 (8am-8pm Mon-Fri)

	Email: help@nspcc.org.uk
Homelessness	
Wandsworth Local Housing Authority	https://www.wandsworth.gov.uk/housing/
Domestic Abuse	
Operation Encompass Helpline	The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).
Wandsworth Support	Wandsworth Community Safety Domestic Abuse
Hestia	Hestia Wandsworth
Disclosure and Barring Service	
DBS	DBS Customer Services, PO Box 3961, Royal Wootton Bassett SN4 4HF Tel: 03000 200 190 Email: customerservices@dbb.gov.uk
UK Safer Internet Centre	
UK Safer Internet Centre	Tel: 0344 381 4772 Email: helpline@saferinternet.org.uk
Reporting Serious Wrongdoing to the Charity Commission	
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer whistleblowing@charitycommission.gsi.gov.uk
Independent Schools Inspectorate	
ISI	0207 6000 100 concerns@isi.net
Teaching Regulation Agency	
Teaching Regulation Agency	Teacher Misconduct, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk

Safeguarding at Emanuel School

If you suspect a child is at risk

Alert a member of the safeguarding team in person, via reception on **020 8870 4171** or on email at safeguarding@emanuel.org.uk

In the event of an emergency out-of-school-hours or during the holidays, a member of the safeguarding team can be contacted at **020 8150 1362**

If the safeguarding team is unavailable and the child is at immediate risk, contact

Wandsworth MASH

mash@wandsworth.gov.uk

020 8871 6622

out-of-hours: 020 8871 6000

Designated Safeguarding Lead

Ravi Kothakota

Deputy Head: Pupils



Deputy Designated Safeguarding Lead

Julia Johnson

Head of Sixth Form



Deputy Designated Safeguarding Lead

Naomi Carpenter-Merritt

Deputy Head of Sixth Form



Deputy Designated Safeguarding Lead

Joanna McIsaac

Head of Middle School



Deputy Designated Safeguarding Lead

Rachel Chetwood

Head of Lower School



Deputy Designated Safeguarding Lead

Mary Galbraith

Director of Safeguarding



If you have a concern about the behaviour of a **member of Emanuel staff**

Alert the headmaster

Headmaster

Robert Milne

robert.milne@emanuel.org.uk

If the headmaster is not available (or if the concern is about him)

Chairman of Governors

Markus Jaigirder

markus.jaigirder@emanuel.org.uk

If the chairman is unavailable

Vice Chair of Governors

Jayne Sutcliffe

jayne.sutcliffe@emanuel.org.uk

A concern about the chairman of governors should be reported to the **Nominated Safeguarding Governor** and the **LADO** without informing the headmaster.

Never think abuse cannot happen here

Introduction

Emanuel School (**school**) is part of the United Westminster and Grey Coat Foundation (**charity**). On behalf of the Foundation, the school is required to take responsibility for fulfilling the statutory safeguarding duties as outlined in DfE *Keeping Children Safe in Education* (September 2024).

This *Safeguarding and Child Protection Policy* applies to the whole school and at all times including where pupils or staff are away from the school, whether they are on school- arranged activities or otherwise, and whether or not the school is open. It will therefore apply out of School hours and in the holidays. This policy applies to core school activities and to out of hours and commercial activities.

This policy is published on the school website and is available in hard copy on request. A copy of the policy is available for inspection from reception during the school day. This policy and all policies referred to in it are also available to staff on Firefly.

This policy can be made available in large print or other accessible formats if required.

The governors and staff of Emanuel School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all pupils at the school and others who come into contact with them. The schools will always seek to support the needs of the individual pupils. The school recognise that all staff, including supply staff, volunteers and contractors, have a full and active part to play in protecting pupils from harm.

All staff should understand the indicators of abuse, neglect, exploitation and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the school community are set out in Appendix I of this policy.

Members of the school community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.

Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

This policy forms part of the school's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the school to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

Although this policy is necessarily detailed, it is important to the school that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The school welcomes feedback on how we can continue to improve our policies.

This policy is designed to address the specific statutory obligations on the school to safeguard and promote the welfare of children and the school's charity law safeguarding duty to:

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff, supply staff and volunteers,
- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly,
- have adequate safeguarding policies, procedures and measures to protect people, and
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and the Charity Commission.

Safeguarding is the protection of people from harm.

Safeguarding and promoting the welfare of children is defined as¹:

¹ Source: Working Together to Safeguard Children 2023, page 7/8

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether this 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 in line with the outcomes.

At Emanuel School we are committed to safeguarding children and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

References to **staff** includes all those who work for or on behalf of the school, regardless of their employment status, including contractors, supply staff, volunteers and governors unless otherwise indicated.

The school believes that it should provide a caring, positive, safe and stimulating environment in which pupils can learn and which promotes the social, physical, mental health and emotional wellbeing of each individual pupil, and which takes a child-centred approach.

The school recognises its responsibilities and duties to report child protection (CP) concerns to the social work service within Children's Services and to assist Children's Services in child protection enquiries and in supporting children in need. The school procedures are in line with those agreed by the Wandsworth Safeguarding Children's Partnership, the LA and the Secretary of State. See page 20 for details of the procedures at Emanuel School.

This policy has been prepared to meet the school's responsibilities under the following legislation: the Children Act 1989, the Education and Skills Act 2008, the Children Act 2004, the Education (Independent School Standards (England) Regulations 2014, the Equality Act 2010, the Protection of Freedoms Act 2012, the Children and Social Work Act 2017, the Safeguarding Vulnerable Groups Act 2006, the Human Rights Act 1998, the Charities Act 2011, the Data Protection Act 2018 and UK General Data Protection Regulation.

The policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (KCSIE) (September 2024),
- London Child Protection Procedures (April 2024),
- Working Together to Safeguard Children 2023 (updated February 2024),
- Prevent Duty Guidance for England and Wales (2023),
- Multi-Agency Statutory Guidance on Female Genital Mutilation (July 2020),
- Children Missing Education (August 2024),
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Guidance (September 2021),
- Channel Duty Guidance: Protecting People Susceptible to Radicalisation (October 2023),
- PACE Code C 2019,
- After-school clubs, community activities and tuition: safeguarding guidance for practitioners (September 2023),
- Working together to Improve School Attendance (August 2024),
- Behaviour in Schools (February 2024),
- Meeting Digital and Technology Standards in Schools and Colleges (maintained).

Please see appendix 7 for further relevant guidance and advice.

The school's inspections are carried out by the Independent Schools Inspectorate which reports on safeguarding arrangements.

Aims

- to actively promote the well-being of pupils.

- to safeguard and promote the welfare of pupils, staff and others who come into contact with the school and to protect them from harm.
- to promote a whole school culture of safety, equality and protection.
- to raise staff awareness about the school's safeguarding expectations, including awareness of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse.
- to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role.
- to ensure consistent good safeguarding practice throughout the school, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it.
- to emphasise the need for good communication between all members of staff in matters relating to safeguarding and child protection.
- to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse, neglect and/or exploitation.
- to raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature.
- to provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns.
- to work openly and in partnership with parents in relation to child protection concerns, where parents are not the cause of those concerns.
- to support all pupils' development in ways that will foster security, confidence and independence.
- to promote safe practice and challenge poor and unsafe practice.
- to further develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- to ensure that all vulnerable children, including those who need a social worker and those requiring mental health support are provided with appropriate help in school to ensure their needs are identified and responded to effectively.
- to ensure that all adults working within the school have been checked as to their suitability to work with children, in line with current guidance.
- to integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages.
- to take account of and inform policy in related areas, such as anti-bullying; online safety; discipline and behaviour; health and safety; missing children; child sexual exploitation; sexual violence and harassment between children; FGM; so-called honour-based violence; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice.
- to comply with the core responsibilities expected of the school as a relevant agency to the multi-agency safeguarding arrangements in Wandsworth, as set out in the published Wandsworth Safeguarding Children Partnership (WSCP) arrangements.

Key Principles

- All children should feel safe and protected from any form of harm and/or abuse, neglect and exploitation.
- The school will take steps to ensure that its pupils and others who come into contact with the school do not, as a result, come to harm or are exposed to abuse.
- The school recognises that abuse, neglect and exploitation are complex issues and rarely stand-alone events and therefore require a culture of vigilance, professional duty and respectful challenge and effective recording and monitoring systems.
- The school recognises that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be considered depending on the child's cultural and social background when dealing with CP issues. However, the school also

recognises that the needs of the child are paramount, and any concerns will be referred on appropriately whatever the family background of the child concerned.

- The school recognises that because of the day-to-day contact with children school staff are extremely well placed to observe outward signs of abuse.
- The school recognises that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self-blame.
- All staff recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. Staff understand that this could be due to the child's vulnerability, disability and/or sexual orientation or language barriers, and this should not prevent them from having a professional duty and speaking to the DSL if they have concerns about a child.
- The school recognises that it may provide the only stability in the lives of children who have been abused or are at risk of harm.
- The school accepts that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overly aggressive, disturbed or withdrawn.
- The school knows that it is important that children feel secure, are encouraged to talk and are sensitively listened to, and that children know that there are adults in school whom they can approach if they are worried or unhappy.
- The school acknowledges that *(although all designated/key staff have the skills and experience to respond to a variety of situations and issues)* there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a pupil can be spoken to by a same sex member of staff (who has received enhanced training) if this is felt to be appropriate.
- The school adheres to the principles of working in partnership with those who hold parental responsibility for each child.
- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount.
- The ethos of the school supports open practice, good communication and a safe culture in which children can thrive and learn.
- All staff, including supply staff, volunteers and contractors should feel able to raise concerns about poor or unsafe practice or potential failures in the school's safeguarding regime and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately.
- All staff should only involve those who need to be involved when a child tells them he/she is being abused, neglected or exploited.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school, inside and outside of home and online.

All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare, and should record these appropriately.

Children's Social Care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Information Sharing and Multi-Agency Working

The school will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The school will always act in order to safeguard and promote the welfare of others.

Effective sharing of information between practitioners and local organisations and agencies is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting the welfare of children and young people, including their educational outcomes and for the early identification of need, assessment and service provision to keep children safe. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the school's paramount concern.

The school has developed effective links with relevant agencies and co-operates with Children's Social Care, and the police as required, with their enquiries regarding child protection matters to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989. The school will contribute to multi – agency assessments of children's needs where appropriate and work in a fully integrated way with other relevant services as appropriate.

The school will refer to National Police Chiefs Council (NPCC) advice on when to call the police for additional guidance on decision making regarding informing the police.

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.

The school understands that the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately and is proportionate and relevant. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All requests for information are dealt with by the designated safeguarding lead who will provide a response in line with the school's statutory obligations. When the school receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the school will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The school will also have regard to its data protection policies. The school's data protection team will work with the DSL as appropriate to determine what should be disclosed.

The school follows the government guidance Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers and ICO guidance. While the school will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies. Refer to the *Data Protection Policy* and *Privacy Notices* for further information.

Emanuel School is part of **Operation Encompass**, a national police and education early intervention safeguarding partnership which supports children who experience domestic abuse. There is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools.

If police have responded to an incident of domestic abuse, as defined in the Domestic Abuse Act 2021 where there are children related to any of the involved adults, Operation Encompass will report this to the school, prior to the start of the next school day unless the force shares notifications from the incident in 'real time'. Any information will be shared securely with the designated safeguarding lead and is treated as sensitive and confidential.

Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child, and so that the best support can be offered to the child if necessary.

Teaching Pupils How to Keep Safe

The governing body ensures that children are taught about how to keep themselves and others safe, including online. The school recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

The school pays particular attention to its practices, especially through the *Life Education* programme, which is fully inclusive and differentiated according to age and understanding of the pupil cohort, to help children adjust their behaviours, both inside and outside school and online, to reduce risks (particularly online), build resilience (including to radicalisation) to protect themselves and their peers, foster healthy and respectful relationships with others and provide information about who they should turn to for help. The school has regard to the statutory DfE guidance which can be found [here](#).

The school recognises the crucial role that it plays in preventative education and that this is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The school recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through RSHE and PSHE education (Life Education) which is fully inclusive and appropriate to their age and stage of development. Sessions on relationships and sex education include amongst other topics:

- 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;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable;
- sharing nudes and semi-nudes;
- porn; and
- sexual bullying as well as
- sessions on online safety, where children are taught to keep themselves safe online and the risks posed by adults/young people, who use the internet and social media to bully, groom, abuse or radicalise.

The safe use of technology and the internet is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities.

Regarding the latter, the governing body of the school is aware of the importance of and has ensured that appropriate monitoring systems and filters are in place to safeguard children from potentially harmful and inappropriate material online when using the school's network and that these should not

lead to unreasonable restrictions as to what pupils can be taught regarding online teaching and safeguarding. The school keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online.

Additionally, tutors work with their charges on developing resilience to the challenges the latter will encounter in life, including mental health problems or the possibility of radicalisation.

Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.

The school also runs pupil focussed groups where pupils are encouraged to speak with pastoral staff and help guide policy on gender equality and mutual respect. Pupil voice is sought through a range of platforms (including school council, the Eco-committee and the Archer Advisory Group).

At the start of each academic year, all pupils receive a presentation created by the head of safeguarding outlining how pupils can report concerns and what happens when they do. Heads of year or form tutors follow this up at the start of each term reminding pupils of how they can report concerns, including through the delivery of a presentation led by the pupil heads of school.

Reporting Concerns (Pupils)

Pupils can report any concerns directly to staff in person, email or by using the 'Pastoral Concern' button on Firefly. This can be done anonymously.

Pupils are able to request time to discuss a pastoral matter using the 'Want to Talk?' button on Firefly.

Posters are displayed in each classroom and communal area with contact details of safeguarding school staff and external organisations.

Communication with Parents/Carers

The school ensures that all parents are informed about the school's child protection/safeguarding policy and the requirement to follow WSCP guidelines in respect of reporting suspected abuse to Children's Social Care.

Parents will be made aware of how the school's safeguarding system works and with whom they can discuss any concerns. Information will also be made available about any local and national telephone helplines.

As well as talking to staff directly, parents can use the 'Reporting a Pastoral Concern' button on the Firefly homepage.

In individual cases, parents will normally be informed of the schools' concerns and, as appropriate, any action of be taken under these procedures at the earliest appropriate opportunity.

Although decisions to seek support for a child in need would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of harm. There may be circumstances when the DSL will need to consult the headmaster, the LADO, local authority children's social care services, the police and / or the pupil before discussing details with parents.

In all cases, the DSL will be guided by the Wandsworth Safeguarding Children Partnership's referral threshold document.

Children with Special Educational Needs, Disabilities (SEND) or Health Issues

The school welcomes pupils with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the school's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

The school recognises that children with SEN and disabilities or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline. The school understands that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children and that these barriers can create additional safeguarding challenges for those involved in safeguarding and promoting their welfare. The school provides additional pastoral support where needed and ensures that appropriate support for communication is in place. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,
- being more prone to peer group isolation or bullying (*including prejudice-based bullying and discriminatory bullying*) than other children,
- the potential for children with SEND or certain medical 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
- cognitive understanding - being unable to understand the difference between fact and fiction in online content and in repeating the content/behaviours in school or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL/DDSL as appropriate.

The DSL (or a deputy) will work closely with the Learning Support department, where necessary, to ensure that any reports of abuse involving children with SEND are responded to appropriately (e.g. for a child with particular communication needs).

The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Children who are Lesbian, Gay, Bisexual or Gender Questioning

The school recognises that a child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. All staff are aware of these vulnerabilities and the school endeavours to create a culture where they can speak out or share their concerns with trusted members of staff.

The school will take a cautious approach when supporting a gender questioning child and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The school will refer to the DfE guidance for schools in relation to *Gender Questioning Children*, when deciding how to proceed.

When families/carers are making decisions about support for gender questioning children, they will be encouraged to seek clinical help and advice.

The school's Pride Committee organises an annual Pride week to support allyship within the community, while a safe spaces for pupils to discuss lesbian, gay or bisexual issues is facilitated by the members of staff in Years 9 and above, while the lead school counsellor, runs a space exploring identity for pupils in the lower school.

Private Fostering

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local

authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead 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 local authority of the private fostering arrangements.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective whole school approach to online safety empowers the school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident/concerns where appropriate. Please refer to the school's *Online Safety Policy* and *Pupil Acceptable Use Policy* for further information.

Pupils must switch off and keep out of sight their mobile phones during the school day unless a teacher has given explicit permission for them to be used. Sixth form students may use their mobile phone in limited situations as described in the *Laptop & Mobile Device Policy* and are encouraged to use the school's wireless/WiFi network.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation, and extremism;
- **Contact:** being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit for sexual, criminal, financial or other purposes; and
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography and sharing other explicit images), or online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. Members of staff should report any concerns to the Anti-Phishing Working Group.

Pupils are taught about online safety as part of their Computing classes and the Life Education programme. Please refer to the *Life Education Policy* and *Online Safety Policy* for further information.

Parents and carers are communicated with to reinforce the importance of children being safe online.

Filtering and Monitoring

Whilst considering its responsibility to safeguard and promote the welfare of pupils and provide them with a safe environment in which to learn, the governing body will do all it reasonably can to limit children's exposure to the risks identified above, including the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk), the risk of children being subjected to harmful online interaction with other users (contact risk), risks such as online gambling, phishing or financial scams (commerce risk) and to help manage online behaviour that can increase the likelihood of, or causes, harm (conduct risk).

As part of the process, the governing body has ensured that appropriate filtering and monitoring systems are in place which meet the DfE's filtering and monitoring standards, and regularly reviews their effectiveness. The school's filtering and monitoring systems are iBoss, Fortinet, Senso and Impero. The decision to adopt these systems has (in part) been informed by a risk assessment.

The school recognises however that pupils have unlimited and unrestricted access to the internet via their mobile phone networks (i.e. 3G, 4G and 5G) which means that they may consensually and/or non-consensually share indecent images, sexually harass, bully and control their peers via mobile and smart technology, and view and share pornography and other harmful content.

The school ensures compliance with the DfE's 'filtering and monitoring standards for schools' and KCSIE by:

- identifying and assigning roles and responsibilities to manage the school's filtering and monitoring systems,
- reviewing the school's filtering and monitoring provision regularly and at least annually,
- blocking harmful and inappropriate content without unreasonably impacting teaching and learning,
- having effective monitoring strategies in place that meet our safeguarding needs and
- ensuring all staff receive online safety training that includes understanding roles and responsibilities in relation to filtering and monitoring.

As part of their duty to take lead responsibility for all aspects of safeguarding and child protection (including online safety), the designated safeguarding lead takes lead responsibility for the filtering and monitoring systems and processes in place at the school and the subsequent actions the school takes.

The nominated safeguarding governor takes oversight of the school's filtering and monitoring systems and processes and their effectiveness on behalf of the governing body whilst considering the number of and age range of pupils, those who are potentially at a greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The nominated safeguarding governor will ensure that all staff receive training which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and have an awareness and understanding of the provisions in place, know how to manage them effectively and how to escalate concerns when identified.

Further detail of the school's policy and procedures in relation to online safety can be found in the school's *Online Safety Policy* and *Pupil Acceptable Use Policy* which also includes detail on the use of mobile and smart technology in school, including the school's management of the associated risks, and the school's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the school's systems.

The school will liaise with parents to reinforce the importance of children being safe online and to make them aware of the systems the school uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. The school will follow the DfE guidance [Safeguarding and Remote Education](#) as well as [Providing Remote Education: Guidance for Schools](#) (DfE).

Wellbeing and Mental Health

In order to help pupils succeed, the school recognises that it plays an important role in supporting them to be resilient and mentally healthy. Some children are more at risk of developing mental health problems than others and these risks can relate to the child, their family or to community and life events. Risk factors are cumulative, and children exposed to multiple risks are more likely to develop behavioural or mental health problems. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

one. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy immediately.

Pupils will be given the opportunity to self-refer to the school counselling services (*the school counsellor or the school chaplain*). Where severe problems occur, the school will ensure that appropriate referrals are made (with consent) to specialist services (e.g. CAMHS). The school will ensure that pupils and their families are enabled to participate as fully as possible in decisions and are provided with information and support. Please refer to the *Mental Health and Wellbeing Policy* for further information.

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

Role of the Designated Safeguarding Lead (DSL)

The governing body ensures that an appropriate senior member of staff of the school's leadership team is appointed to the role of designated safeguarding lead. At Emanuel School this is the deputy head: pupils. The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the school. This is described in the role holder's job description.

This person has the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility and they are given the additional time, funding, training, resources and support they need to carry out the role effectively. Their responsibilities include providing advice and support to other staff on child welfare and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

The DSL is supported by a team of deputy designated safeguarding leads including the heads of sections and head of safeguarding. Deputies are trained to the same standard as the designated safeguarding lead and the role is explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the school understands that the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

During term time the designated safeguarding lead (or deputy) is available (during school hours) for staff in the school to discuss any safeguarding concerns. In the event of an emergency out-of-hours or during the holidays, a member of the safeguarding team can be contacted on 020 8150 1362. When it is not possible to meet in person, staff can contact them by phone, email or arrange a call on Teams.

In accordance with Annex C of KCSIE 2024, **key responsibilities of the DSL** include:

Managing Referrals

- referring cases of suspected abuse, neglect and exploitation to the local authority children's social care as required,
- supporting staff who make referrals to the local authority children's social care,
- referring cases to the Channel programme where there is a radicalisation concern as required,
- supporting staff who make referrals to the Channel programme,
- referring cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- referring cases where a crime may have been committed to the Police as required. [NPCC – When to Call the Police](#).

Working with Others

- acting as a source of support, advice and expertise for all staff,
- acting as a point of contact with the safeguarding partners,

- liaising with the headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations,
- as required, liaising with the “case manager” (as per Part Four of KCSIE) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member,
- liaising with staff (especially teachers, pastoral support staff, school nurses, IT staff, mental health first aiders and SENCOs) on matters of safety and safeguarding and welfare (including online and digital safety and mental health) and when deciding whether to make a referral by liaising with relevant agencies so that the children’s needs are considered holistically,
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health,
- promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances,
- working with the headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced, and identifying the impact that these issues might be having on a child’s attendance, engagement and achievement at school. This includes:
 - ensuring that the school is aware of the pupils who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care has ended, there is still a lasting impact on children’s educational outcomes.

Raising Awareness

- ensuring each member of staff has access to, and understands, the school’s safeguarding and child protection policy and procedures, especially new and part-time staff,
- ensuring the school’s child protection policy is reviewed annually (*as a minimum*) and the procedures and implementation are updated and reviewed regularly, and working with the governing body regarding this,
- ensuring the child protection policy is available publicly and parents are aware that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this,
- linking with the local LSCP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

Training, Knowledge and Skills

The designated safeguarding lead and deputies will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.

The DSL and deputies will undergo training at an appropriate level to provide them with the knowledge and skills to carry out the role. The Deputy DSLs should be trained to the same standards as the DSL. This training will be updated at least every two years in line with local requirements and this will include local inter-agency working protocols. They must also attend Prevent training.

Their knowledge and skills will be refreshed at regular intervals and at least annually to provide them with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children’s social care so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements,

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so,
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children,
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes,
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff,
- are alert to the specific needs of children in need, those with special educational needs and disabilities, those with relevant health conditions and young carers,
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation,
- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year, and with the safeguarding partners, other agencies, organisations and practitioners,
- are able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions and include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program,
- understand and support the school with regards to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation,
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school,
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online,
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Specific Safeguarding Issues

Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary.

The DSL and deputies will attend relevant training and ensure that staff are aware of issues such as child sexual exploitation, harmful sexual behaviours, child on child abuse, female genital mutilation, illness fabricated and induced, domestic abuse and honour-based abuse, understand the indicators and recognise the complexities of these issues for young people.

Child Protection File

The DSL follows Annex C of KCSIE where children leave the school. The DSL will ensure that their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

On receiving a child protection file, the school will ensure that key staff, such as the DSL and the SENCO, are aware as required.

Child Protection Plans

Where a pupil at the school has a child protection plan, the school will ensure that:

- the child's social worker is notified of any pupil subject to a child protection plan who is absent from school without explanation for more than 2 days.
- any new concern or relevant information about a child subject to a child protection plan will be passed to the child's allocated social worker without delay.
- if a child subject to a child protection plan leaves the school, records will be transferred to the new school without delay and the child's social worker informed of the change.

Recordkeeping

All records are kept in line with Annex C of KCSIE 2024. All concerns, discussions and decisions made and the reasons for those decisions should always be recorded in writing. This will help if/when responding to any complaints about the way a case has been handled by the school. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should 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.

Information created in accordance with this policy may contain personal data. The school's use of this personal data will be in accordance with data protection law. The school's privacy notice, which are published on the school website, explains how the school will use personal data for the benefit of pupils and parents. In addition, staff must ensure that they comply with data protection law and follow the DfE guidance [Data Protection in Schools](#) as well as the school's data protection policies/procedures when handling personal data.

The DSL ensures there is an effective recording system for safeguarding matters, which is kept securely and confidentially with access restricted to those members of staff who have a lead role. Incidents of bullying, sexual harassment and violence are logged and reviewed for behavioural trends.

Safeguarding concerns are recorded in 'Secure Notes' on EMA. This system is available to all staff (with access restrictions put in place where required). Any action taken and decision-making rationale is recorded centrally in 'Secure Notes'.

Child protection concerns are recorded in 'My Concern'. Only the DSL and deputies, head of safeguarding and headmaster are able to enter concerns, view and add updates to concerns stored on 'My Concern'. Any action taken and decision-making rationale is recorded in 'My Concern'.

All records created in accordance with this policy are managed in accordance with the school's policies that apply to the retention and destruction of records.

Governing Body Responsibilities

The governing body has overall responsibility for all matters which are the subject of this policy, including:

- legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to relevant guidance issued by the Secretary of State;

- strategic leadership responsibility for the school's safeguarding arrangements; and
- specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

The governing body will:

- appoint a board level lead on safeguarding matters (*whose contact details are set out in the school contacts list at the front of this policy*) who will meet with the designated safeguarding lead and head of safeguarding at least termly.
- ensure that it complies with its duties under legislation, including under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have and that they are aware of their obligations under their local multi-agency safeguarding arrangements.
- ensure that the policies, procedures and training in the school are effective and comply with the law and obligations, including under the Human Rights Act 1998 and the Equality Act 2010, at all times and take into account the procedures and practice of the WSCP.
- ensure that a member of the governing body (usually the chair) has been nominated to liaise with the local authority (LA) and/or partner agencies on issues of child protection and in the event of an allegation of abuse being made against the headmaster. The governors will remedy any deficiencies or weaknesses regarding child protection arrangements that are brought to its attention without delay.
- ensure that the school contributes to multi-agency working in line with the statutory guidance *Working Together to Safeguard Children*.
- ensure that children are taught about how to keep themselves and others safe, including online and that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with SEND.
- ensure that appropriate arrangements are in place for the whole governing body to discharge their function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding.
- establish appropriate delegation arrangements at school level, led by the headmaster and DSL, to enable the school to discharge its safeguarding duties effectively.

The school's nominated governor for safeguarding and child protection is Robin Fry with Tara Lyons as his deputy.

The school's link governor meets with the designated safeguarding lead each term and completes an annual review in the summer term which is submitted to the full governing body. This includes a review of the school's single central register. See 'Monitoring and review' below for further information.

The governing body will ensure that all governors receive appropriate safeguarding and child protection training (including online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and regular updates thereafter, that is consistent with KCSIE and local safeguarding partner guidance. This training aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust school approach to safeguarding.

The chair of governors and those with specific responsibility for safeguarding will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.

Headmaster Responsibilities

The headmaster is responsible for the overall management of the school and for the management of concerns and allegations about staff.

The headmaster ensures that the school's policies and procedures, adopted by the governing body and proprietor (*particularly those concerning referrals of cases of suspected abuse, neglect and exploitation*) are understood, and followed by all staff.

Staff (and Volunteer) Responsibilities

All staff have a duty to:

- report any concerns they may have about the safety and/or wellbeing of pupils,
- report any concerns they may have about the safety and/or wellbeing of other persons associated with the school,
- report any safeguarding concerns about staff or anyone else associated with the school,
- follow up on any such reports to ensure that appropriate action is or has been taken.

School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff are required to read this policy carefully and to be aware of their role in these processes.

- Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Exercising professional curiosity and knowing what to look for is vital to the early identification of abuse, neglect and exploitation. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).
- All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse, neglect and exploitation are described in Appendix I.
- Any staff member who has a safeguarding concern should follow the reporting and referral processes described in this policy. Staff should expect to support social workers and other agencies following any referral.
- Where a staff member has concerns about poor or unsafe practice or potential failures in the school's safeguarding systems, these should be raised in accordance with the school's *Whistleblowing Policy*. If staff do not feel able to raise an issue with the school or feel that their genuine concerns are not being addressed, they may contact the NSPCC Whistleblowing Advice Line as an alternative route. Please refer to 'Key Staff and Agency Contact Details'.
- All staff should understand the school's role and responsibilities within the local partnership. Please refer to 'Information Sharing and Multi-Agency Working' section for further information.
- Staff should be aware that a child may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. For example, a child may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- It is important that staff determine how to best build trusted relationships with pupils which facilitate communication.

Training

All staff will receive appropriate safeguarding and child protection training (including online safety) regularly, in line with advice from . In addition, all staff receive safeguarding and child protection updates (via email and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

School leaders and staff who work directly with children will also receive Part one and, where appropriate, Annex B of KCSIE and will be required to confirm that they have read and understand these.

Staff not working directly with children will receive, where appropriate, Annex A of KCSIE instead of Part one, if the governing body think it will provide a better basis for those staff to promote the welfare and safeguard children.

The headmaster and all staff members will undertake appropriate safeguarding training which will be updated at least annually. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via staff meetings on a regular basis.

Staff development training will also include training on online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), searching pupils for prohibited and banned items and Prevent duty training assessed as appropriate for them by the school. Staff also receive training on how to manage a report of child-on-child sexual violence and sexual harassment. Staff should also refer the Appendix 2 of the school's Code of Conduct about how to interact with pupils safely in one-to-one scenarios, including music lessons and sports changing rooms.

The school recognises that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape safeguarding arrangements and policy. Additionally, the school will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child criminal and sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep children safe.

All governors receive safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction. This training will equip with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated and is in line with any advice from the safeguarding partners.

The nominated governor for safeguarding and child protection and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the nominated governor for safeguarding and child protection will be expected to read the entirety of KCSIE. All other governors will be expected to read Part two of KCSIE as a minimum.

The school has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time.

All staff should be aware of systems within their school which support safeguarding and these are explained to them by members of the safeguarding team as part of staff induction. This will include but is not limited to:

- the *Safeguarding and Child Protection Policy*,
- the *Behaviour Policy*,
- the *Anti-Bullying Policy* (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying),
- the *Staff Code of Conduct*,
- the *Staff Acceptable Use Agreement*,
- the school's *Whistleblowing Policy* and *Neutral Notification Guidance*,
- the role, identity and contact details of the DSL and Deputy DSLs,
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods (*Attendance Policy / Children Missing from Education Policy*),

- the school's approach to online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring (*Online Safety Policy*),
- safeguarding training in accordance with the WSCP procedures including guidance on managing a report of child-on-child harmful sexual behaviour,
- digital copies of policies and a *Safeguarding FAQs* document,
- where determined appropriate by the governing body, a copy of Annex A of KCSIE for those staff not working directly with children, or
- a copy of Part one of *Keeping Children Safe in Education* and, where appropriate, Annex B of KCSIE for school leaders and those who work directly with children; and
- appropriate Prevent duty training.

All staff must be aware of their local **early help** process and understand their role in it and be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Refer to the referral process below and *Working Together to Safeguard Children* for further information.

All staff must be aware of the process for making referrals to children's social care and for **statutory assessments** under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Refer to the referral process below and *Working Together to Safeguard Children* for further information.

All staff must know what to do if a child tells them they are being abused, neglected or exploited. Staff must know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

A proportionate risk-based approach to the level of information and training that is provided to temporary staff, volunteers and contractors will be taken. For example, contractors with an ongoing relationship with the school will receive a tailored safeguarding video training presentation and have to adhere to the contractor's code of conduct.

Support for Staff

The school recognises that staff working in the school who have been dealing with child protection issues may find the situation stressful or upsetting. The school will:

- ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have, including telephone and face-to-face counselling.
- consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate.

Staff Member Responsible for Looked After Children (Designated Teacher)

The school recognises that Looked After Children (LAC) and previously LAC are potentially vulnerable and will work together with other agencies including social workers and the virtual school head in the authority. When the need arises, the school will ensure there is a designated teacher whose role is to promote the educational achievement of children who are looked after, and that the identified person has received appropriate training and the relevant qualifications and experience.

The governing body will ensure that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.

They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her, as well as the details of the child's social worker. The school will work to support the progress of looked after children in the school.

The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

Positive Handling and Physical Intervention

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. A record of all such incidents is maintained by the DSL.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, the school will consider the risks carefully recognising the additional vulnerability of these children.

The school understands that positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents/carers, can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The school follows the DfE advice *Use of Reasonable Force in Schools* and HM government guidance *Reducing the Need for Restraint and Restrictive Intervention* as appropriate.

Safer Recruitment

The school is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the school whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the school. These processes are in line with part 3 of *Keeping Children Safe in Education 2024*.

Members of the teaching and non-teaching staff including part-time staff, temporary and supply staff, and visiting staff, such as visiting music teachers and sport coaches, are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Online checks will also be considered as part of our due diligence checks on shortlisted candidates. This may help to identify any incidents or issues that have happened and are publicly available online, which the school may want to explore with an applicant at interview.

Full details of the school's safer recruitment procedures for checking the suitability of staff, contractors, governors, volunteers to work with children is set out in the school's *Recruitment Policy*.

The school's protocol for ensuring that any visiting speakers are suitable and appropriately supervised is set out in the *Visiting Speakers Policy*.

Risk Assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk and needs assessment may vary and may be included as part of the school's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the school's approach to promoting pupil welfare will be systematic and pupil focused.

The headmaster has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

Monitoring and Review

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the governing body as necessary and seeking contributions from staff. The DSL will update the senior leadership team regularly on the operation of the school's safeguarding arrangements.

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

This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

The governors will undertake an annual review of this policy and the school's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and its filtering and monitoring provision.

The DSL and head of safeguarding will work with the nominated governor for safeguarding and child protection preparing a written report commissioned by the governing body. The written report should address how the school ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the school and how these have been handled; and the contribution the school is making to multi-agency working in individual cases or local discussions on safeguarding matters. The governors should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the designated officer(s);
- reports of ISI inspections,
- the outcome of any relevant parental complaints and
- press reports.

The governors will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the governors will be made.

PROCEDURES

Procedure for Dealing with Concerns about a Child

The school procedures are in line with those agreed by the Wandsworth Safeguarding Children Partnership, the LA and the Secretary of State.

All staff members have a statutory responsibility to safeguard and promote the welfare of all pupils at all times.

Reporting a Concern about a Child

If a staff member has any concern about a pupil or receives information that leads them to be concerned that a pupil **has been harmed or is at risk of harm or their welfare is being compromised**, they must act immediately and follow the relevant procedures in this policy to ensure action can be taken to protect the pupil concerned. Staff should never assume that somebody else will take action and share information that might be critical in keeping children safe; they should always maintain an “it could happen here” attitude and always act in the best interests of the child when concerned about their welfare.

The member of staff must immediately report the concern to the **DSL**, or the **DDSL** in the DSL's absence, to agree a course of action.

It is important to understand that pupils may not find it easy to tell staff about abuse verbally. Pupils can show signs or act in ways that they hope adults will notice and react to. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

If the concern involves an allegation against staff, supply staff, contractors or volunteers, this must be reported in accordance with the procedures set out below and Parts one and four of KCSIE.

FGM Mandatory Reporting Duty for Teachers

Teachers must report known cases of female genital mutilation (FGM) to the police. Further information about FGM and the reporting duty can be found in Appendix I. Non-teaching staff should refer FGM concerns to the DSL.

Dealing with a Disclosure made by a Child

The concern may be as a result of a disclosure from a pupil, a parent or a third party or may arise due to behaviour that has caused the staff member to become concerned.

When listening to a child, staff must:

- listen carefully to what the pupil is telling them without interrupting and keep an open mind,
- ideally listen to the child first and then make notes,
- not promise absolute confidentiality and explain the need to pass on the information in accordance with this policy so that the correct action can be taken,
- remain non-judgemental and keep an open mind,
- not ask leading questions. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings,
- be honest with the pupil and explain what will happen next,
- be aware that the pupil may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful (*Staff should exercise professional curiosity and speak to the DSL if they have concerns*),

- keep a sufficient written record of the conversation. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

- the pupil's details: name; date of birth; address and family details,
- date and time of the event/concern/conversation,
- a clear and comprehensive summary of the event/concern/conversation,
- details of how the concern was followed up and resolved,
- a note of any action taken and by whom, decisions reached and the outcome,
- the name and position of the person making the record.

Staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them.

When receiving a report of harmful sexual behaviour, staff must follow the guidance provided in Part 5 KCSIE. This includes:

- Only record the facts as the child presents them.
- Where the report includes an online element, do not view or forward illegal images of a child. See Appendix 1 and the UK Council for Child Internet Safety's advice Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfE and UK Council for Internet Safety, March 2024) for advice when viewing an image is unavoidable. Where the report includes child-on-child abuse, staff should refer to Appendix 2 of this policy, as well as the following guidance:
 - DfE *Keeping Children Safe in Education* (2024)
 - Farrer & Co *Peer on Peer Abuse Toolkit* (2019)
 - Lucy Faithfull Foundation *Harmful Sexual Behaviour Toolkit* (2020)
- Manage reports with another member of staff present (*preferably the DSL or DDSL*), if possible.
- Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

When reporting a concern, staff must:

- Record the information fully - preferably using the *Reporting a Concern* form (available on Firefly or Appendix 8)
- If accessing the form is not possible, staff must not delay in informing the DSL or Deputy DSLs.
- Note the facts in the child's own words.
- Pass the form by hand personally or via confidential email to the DSL or deputies immediately. Staff should use the email address safeguarding@emanuel.org.uk where possible.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care at Wandsworth's Multi-Agency Safeguarding Hub (MASH) (and if appropriate the police) is made immediately.

Asking for Advice

Staff should remember the DSL is available to offer help, advice and guidance to staff and pupils where necessary. If staff have a concern or problem and are unclear how to proceed, they should ask for advice.

If the school is unsure how to proceed with a child protection situation, or require advice, this will be sought via the Safeguarding in Education Advisor, a duty manager at MASH or directly from the Safeguarding Standards Service.

What if the DSL is unavailable?

During term time the designated safeguarding lead (or deputy) is always available (during school hours) for staff in the school to discuss any safeguarding concerns. In the event of an emergency out-of-hours or during the holidays, a member of the safeguarding team can be contacted on 020 8150 1362. When it is not possible to meet in person, staff can contact them by phone or email or Teams.

The deputy head: pupils/designated safeguarding lead is the emergency contact for all school trips. If the deputy head: pupils/designated safeguarding lead is not available, the headmaster is next point of contact. The deputy head: pupils/designated safeguarding lead and headmaster's contact details are shared with the trip organiser.

If, in exceptional circumstances, a member of staff is unable to locate or contact the DSL, (or deputies), they must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and / or advice should be taken from children's social care. The contact details are set out at the front of this policy.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care should be made immediately. Staff should be aware of the process for making referrals direct to MASH (or the police) themselves. Staff must inform the DSL or deputies, or a member of the senior leadership team, as soon as possible when they make a referral directly. All contact details are at the front of this policy.

In all other instances concerns should be passed on to the DSL as soon as possible – do not delay.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Action by the DSL

On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Wandsworth Safeguarding Children Partnership procedures and referral threshold document. Such action may include:

- managing any support for the pupil internally via the school's own pastoral support processes, seeking advice from the local authority children's social care services where required (see below);
- a multi-agency referral form (see below); or
- a referral for statutory services (see below).

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

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

Supporting a Pupil at School

If the DSL and deputies feel a child can be supported appropriately through internal school pastoral processes, these will be put in place to support and monitor the welfare of the child. Where required, the DSL will seek advice from external agencies.

Support is provided by the form tutor and also head of year and head of section and a pupil may be referred to the school's counselling services. Refer to the *Pastoral Policy* and *Mental Health and Wellbeing Policy* for further information.

The school has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See 'Risk assessment' section above.

The school will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from children's social care where necessary.

Early Intervention and Help

Early help, also known as early intervention, means providing support to a family as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It can be provided to parents, children or whole families, and is generally supported by children's social care in consultation with the family.

All staff recognise that when a child or family may be experiencing difficulties, support is most effective in promoting the welfare of children if it is provided as early as possible. This involves identifying emerging problems; liaising with the designated safeguarding lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking a multi-agency referral form (MARF) (previously early help assessment (EHA)).

- Any concerns will be identified by staff, discussed with relevant colleagues and parents and support put in place. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes.
- If appropriate support is not available within school's own resources, a multi-agency referral form will be completed to identify the child's needs and enable additional support to be sought from other agencies.
- A Team Around the Child will be established where appropriate and a lead professional identified.
- if early help is in place the situation will be kept under constant review and consideration given to additional referrals (e.g. to social care) if the child's situation does not appear to be improving.
- Multi-agency referral forms will follow the Signs of Safety and Wellbeing model.

All staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs,
- has special educational needs (*whether or not they have a statutory education, health and care plan*),
- has a mental health need,
- is a young carer,
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines,
- is frequently missing/goes missing from education, care or from home,
- has experienced multiple suspensions, is at risk of being permanently excluded and in Alternative Provision or a Pupil Referral Unit,
- is at risk of modern slavery, trafficking sexual and/or criminal exploitation,

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems or domestic abuse,
- is misusing alcohol or other drugs themselves,
- is at risk of being radicalised or exploited,
- is a privately fostered child,
- has a parent or carer in custody, or is affected by parental offending,
- at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.

A member of staff who considers that a pupil may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of early help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

Early Help Assessment

If **early help** is appropriate, the designated safeguarding lead (or deputy) 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 and will be supported by the DSL in carrying out this role. In some cases, school staff may be required to take a lead role. The school refers to *Working Together to Safeguard Children* for further guidance on effective assessment of the need for early help.

Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Making a Referral

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (CSC) and if appropriate the police (see NPCC [When to Call the Police: Guidance for Schools and Colleges](#)) should be made immediately.

"Harm" is the "ill treatment or impairment of the health or development of a child". Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC. The contact details for children's social care (CSC) are set out at the front of this policy.

Statutory Assessments

Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- **Children in need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

- **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Where incidents and/ or behaviours are associated with factors outside the school, the school will consider contextual safeguarding and whether wider environmental factors are present in a child's life that are a threat to their safety and wellbeing. The school will provide as much information as possible during the referral process.

Anybody can make a referral. Parental consent is not required for referrals to statutory agencies, but staff required to make a referral directly will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

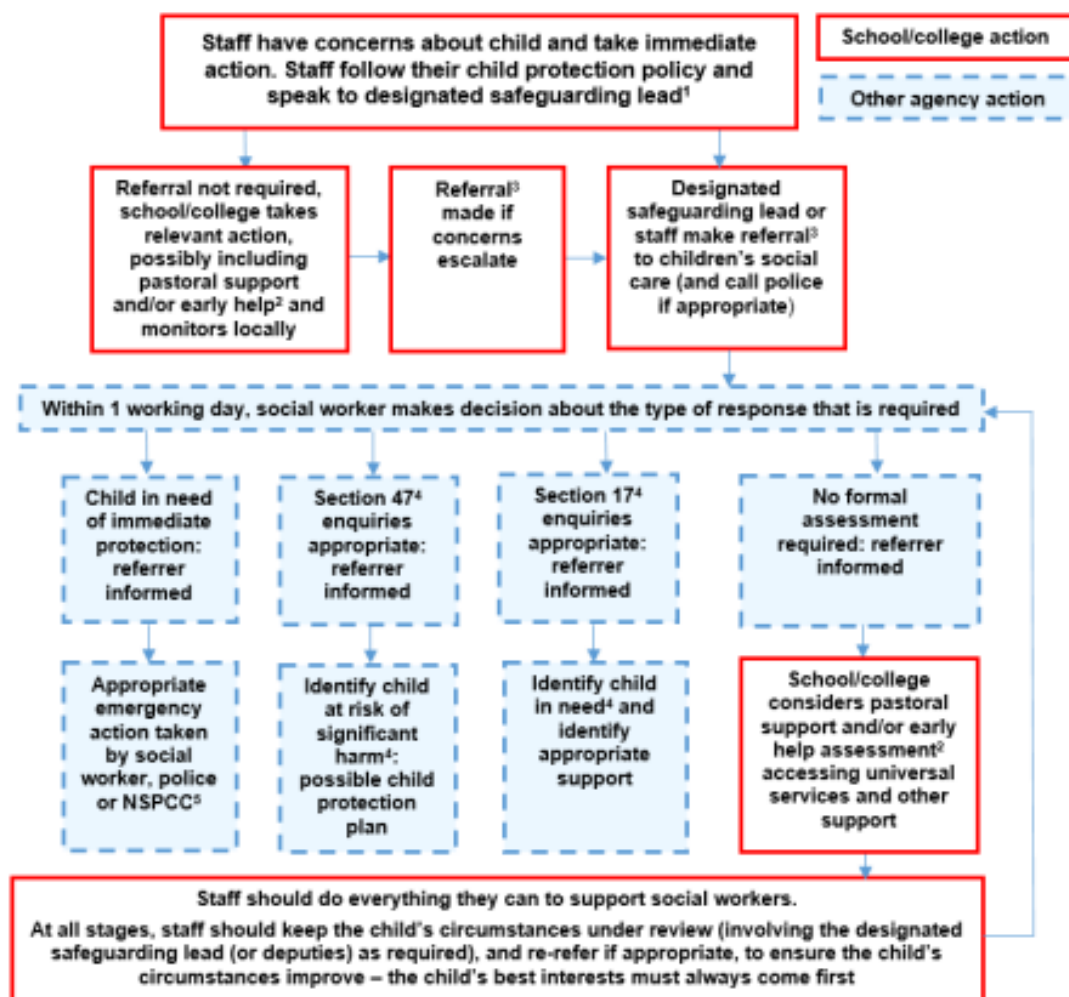
- personal details of the child including the child's developmental needs,
- detailed information about the concern,
- information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or person making the referral) will contact MASH to follow up. If a child's situation does not appear to be improving following a referral, the school will take responsibility for finding out what is happening and keep pressing for action to be taken, following the local escalation procedures to ensure that the concerns have been addressed and that the child's situation improves. The flowchart below outlines the referral process.

When making referrals to support agencies the school will act in accordance with WSCP Thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need thresholds.

Referral Flowchart



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Source: Keeping Children Safe in Education (September 2024), page 24

What to Do if Staff have a Concern about Someone Else's Welfare

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

Allegations Against Staff (including Supply Teachers, Volunteers and Contractors)

This part of the guidance relates to members of staff all adults (including governors, supply staff, volunteers and contractors) who are currently working in or on behalf of the school whether in a paid or unpaid capacity regardless of whether Emanuel is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police and LADO. Historical (non-recent) allegations of abuse should also be referred to the police and the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children social care and the police. If the school is made aware of historic allegations against staff, they will reported to the police.

The school recognises that there will be occasions when a pupil at the school, or a parent or another person may make an allegation against a member of staff.

Concerns and allegations that may meet the harms test will be addressed as set out in Section two of Part four of KCSIE. 'Lower level' concerns and allegations that do not meet the harms test will be addressed as set out in Section two of Part four of KCSIE.

Allegations that may meet the harms threshold:

The term allegation refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. This means it has been alleged that anyone working (including supply staff, volunteers and contractors) in a school or college that provides education for children under 18 years of age has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she would 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.

When the allegation meets the criteria above:

- inform the headmaster immediately where an allegation is made about any member of staff (other than the headmaster) including the DSL. The headmaster would inform the LADO immediately of such an allegation.
- where the allegation is about the headmaster, inform the chair of governors immediately without first informing the headmaster. The chair would immediately inform the LADO of such an allegation.
- where there is a conflict of interest in raising the concern with the headmaster, report the concern directly to the LADO, without first notifying the headmaster;
- where there is a concern about a governor, report the matter immediately to the Chair of Governors or the Nominated Governor for Safeguarding and Child Protection. If either the Chair of Governors or the Nominated Governor for Safeguarding and Child Protection is the subject of an allegation, you must report the matter to the other;
- follow Wandsworth Procedures for Managing Allegations against Staff. This will always involve a discussion with LA officers and a referral to the Local Authority Designated Officer (LADO).

If it is not possible to report to the headmaster or chair of governors, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the headmaster or, where appropriate, the chair of governors.

All such allegations must be dealt with as a priority without delay.

Allegations about Organisations or Individuals using School Premises

If the school receives an allegation or safeguarding concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities), it will follow its *Safeguarding and Child Protection Policy* and procedures, including informing the LADO.

Please see 'Arrangements for the use of school premises for non-school activities' in appendix 3.

Concerns that do not meet the harm threshold:

Low Level Concerns (Neutral Notifications)

The school uses a system of neutral notifications to log all low level-concerns.

Staff are required to self-report in any situation where they feel their behaviour towards a pupil could be misinterpreted or misconstrued or leave them vulnerable. They are also required to report any behaviour by an adult towards a pupil that may have concerned them.

All low level concerns are reviewed by the DSL and headmaster, and acted upon where there is a concern over the behaviour. The DSL will share low level concerns relating to staff behaviour with the headmaster. By having a formalised method of reporting low-level concerns, it allows for the identification of patterns of behaviour that might be concerning and allows staff to reflect and self-report on their behaviour, to strengthen the culture of safeguarding within the school.

Concerns may be graded low-level if the concern does not meet the criteria for an allegation (see appendix 5). Staff are required to report these using the neutral notifications button on Firefly [here](#).

The term 'low level' concern does not mean that it is insignificant. A 'low level' concern is any concern - no matter how small, and even if no more than causing a sense of unease or 'nagging doubt' - that an adult working in the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children (such as using nicknames and or oversharing personal information),
- having favourites,
- taking photographs of children on their mobile phone, contrary to school policy,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.
- humiliating pupil,
- any use by an adult of sexually inappropriate language, references or jokes to a pupil.

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

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

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

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

Low level concerns should be recorded in writing, including:

- details of the concern,
- context in which the concern arose,
- action taken.

Records will be kept confidential, held securely and comply with the Data Protection Act 2018.

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

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

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

Refer to Appendix 5 for more details on the school's process for responding to allegations about staff, the school's *Neutral Notifications* guidance and appendix 9 (neutral notifications form).

Supply Teachers, Contractors and Volunteers

In some circumstances the school may have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst the school is not the employer of supply teachers, it will ensure allegations are dealt with properly. In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools will inform the agency of its process for managing allegations. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Informing Parents

Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the headmaster, the LADO, children's social care, the police and / or the pupil before discussing details with parents.

In all cases, the DSL will be guided by the WSCP referral threshold document.

See also Appendix 5 for details about the disclosure of information where an allegation has been made against a member of staff.

Additional Reporting

In addition to the reporting requirements explained above, the school will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

Health and Safety Executive

The school is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the school's *Health and Safety Policy*.

Charity Commission

With the Foundation's prior agreement, the school will report serious incidents to the Charity Commission in accordance with the guidance *How to report a serious incident in your charity (Charity Commission, June 2019)*.

Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:

- pupils have been, or are alleged to have been, abused or mistreated while under the care of the school or by someone connected with the school, for example a governor, staff member or volunteer,
- there has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the school,
- there has been a breach of the school's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.

The Charity Commission will be notified of other agencies to which the incident has been reported in accordance with this policy.

Disclosure and Barring Service (DBS)

The school will make a referral to the DBS promptly where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults.
- satisfied the harm test in relation to children and/or vulnerable adults; or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Teaching Regulation Agency (TRA)

Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he / she had not resigned.

Insurers

The school will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there any be concurrent cover under existing and historic policies.

Care should be taken to ensure this is done before renewal to ensure that the school complies with its duties under the Insurance Act 2015. If the school is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

Policy Review and Approval

Policy Owner	Deputy Head: Pupils/Designated Safeguarding Lead
Date of last review	Summer 2024
Approved by	Cabinet: 2 October 2024 Pastoral Committee: 7 October 2024 Full Governing Body: 18 November 2024
Responsible Committee	Pastoral
Date of next review	Summer 2025

Related Documents

This policy has clear links to other policies in the school, in particular to any policies concerned with the protection of all children in the school from various kinds of harm. These policies include:

- | | |
|------------------------------------|--|
| Anti-Bullying Policy | Health and Safety Policy |
| Attendance Policy | Learning Support and SEN Policy |
| Behaviour Policy | Life Education Policy |
| Children Missing Education Policy | Medical and First Aid Policy |
| Confidentiality Guidance for Staff | Pupil Acceptable Use |
| Data Protection Policy | Relationships and Sex Education Policy |
| Disability | Risk Assessment Policy |
| Drugs Policy | Staff Acceptable Use Agreement |
| Educational Visits Policy | Staff Code of Conduct |
| Equal Opportunity Policy | Recruitment Policy |
| Online Safety Policy | Visiting Speakers Policy |
| | Mental Health and Wellbeing Policy |
| | Whistleblowing Policy |
| | Neutral Notifications Guidance |

Appendix I: Types and Signs of Abuse

Staff must refer to KCSIE 2024 Part 1 and Annex B: Further Information for more details.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label alone. In most cases, multiple issues will overlap with one another therefore the school expects staff to be vigilant and always raise any concerns with the DSL/DDSLs.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL/DDSL, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Abuse, Neglect and Exploitation

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of the home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

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

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific Forms of Abuse and Safeguarding Issues

Statutory guidance acknowledges a number of specific safeguarding issues. Additional information on these safeguarding issues and information on other safeguarding issues can be found in Annex B of KCSIE. Staff should be particularly aware of these safeguarding issues, including those set out below.

Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (behaviour that has an adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be following and both young victims and perpetrators should be offered support.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation,
- Gang-association and/or isolation from peers/social networks,
- Exclusion or unexplained absences from school, college or work,
- Leaving home/care without explanation and persistently going missing or returning late,
- Excessive receipt of texts/phone calls,

- Returning home under the influence of drugs/alcohol,
- Inappropriate sexualised behaviour for age/sexually transmitted infections,
- Evidence of/suspicions of physical or sexual assault,
- Relationships with controlling or significantly older individuals or groups,
- Multiple callers (unknown adults or peers),
- Frequenting areas known for sex work,
- Concerning use of internet or other social media,
- Increasing secretiveness around behaviours and
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse,
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example),
- Recent bereavement or loss,
- Social isolation or social difficulties,
- Absence of a safe environment to explore sexuality,
- Economic vulnerability,
- Homelessness or insecure accommodation status,
- Connections with other children and young people who are being sexually exploited,
- Family members or other connections involved in adult sex work,
- Having a physical or learning disability,
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in [Child Sexual Exploitation: Definition and Guide for Practitioners \(DfE 2017\)](#).

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into transporting drugs or money across the country (see **County Lines**), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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 and CSE can affect children, both male and female and can include children who have moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators

may not be the same, however staff should be aware that girls are at risk if criminal exploitation too. It is also important to note that both boys and girls being criminally exploited maybe at higher risk of sexual exploitation. Further information of definitions and indicators is included in Annex B of KCSIE.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”. The activity can happen locally as well as across the UK – no specified distance of travel is required.

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 places including schools and online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Several identifying indicators for CSE and CCE may be applicable to where children are involved in county lines but may also include children who:

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

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

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

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

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also more likely to be abused than their peers.

Child-on-Child Abuse

Children can abuse other children and it can take many forms. It can happen both inside and outside of school and online.

See Appendix 2 for more information about child-on-child abuse, including sexual violence and sexual harassment between children.

Upskirting is a criminal offence and typically involves someone taking a picture under another person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Serious Violence: Indicators which may signal that children are at risk from or are involved in serious violence include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, sign of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as 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. More advice can be found in the Home Office's [Preventing Youth Violence and Gang Involvement](#) and its [Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance \(September 2018\)](#).

Honour-Based Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. The school is aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and have a specific legal duty to act with regards to concerns about FGM.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the [Multi-Agency Statutory Guidance on FGM \(HM Government, July 2020\)](#) (pages 61-63 focus on the role of schools).

Risk factors for FGM include:

- low level of integration into UK society,
- mother or a sister who has undergone FGM,
- girls who are withdrawn from PSHE,
- visiting female elder from the country of origin,
- being taken on a long holiday to the country of origin,
- talk about a 'special' procedure to become a woman.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable,
- spending longer than normal in the bathroom or toilet due to difficulties urinating,

- spending long periods of time away from a classroom during the day with bladder or menstrual problems,
- frequent urinary, menstrual or stomach problems,
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return,
- reluctance to undergo normal medical examinations,
- confiding in a professional without being explicit about the problem due to embarrassment or fear,
- talking about pain or discomfort between her legs.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

[Home Office - FGM – The Facts \(Leaflet\)](#)

FGM – Reporting Duty

FGM is **illegal** in the UK and there is a statutory duty on teachers to report to the police where they discover (*either through disclosure by the victim or visual evidence*) that FGM appears to have been carried out on a girl under 18. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy.

See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 35 – 37 of the [Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage \(HM Government, March 2022\)](#) Pages 75-80 of the guidance focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Children and the Court System: Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. Where appropriate, the school might refer parents and carers to the online service/guide [Get Help with Child Arrangements](#) from the Ministry of Justice.

Children with Family Members in Prison: Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and

poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children Who Go Missing from Home or Care are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high-risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on schooling and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency/alcohol dependency
- Crime
- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

Children who are absent from school: All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. Children who are absent from school particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, CSE, CCE or sexual abuse. It can also be a sign of criminal exploitation including involvement in county lines. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called ‘honour’-based abuse or risk of forced marriage.

Staff must follow the required procedures for unauthorised absence and for dealing with children who are absent from education, particularly persistently or for prolonged periods including informing the local authority as required. The school will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance. The school’s procedure for dealing with children who are absent/missing can be found in the *Children Missing Education Policy* and *Attendance Policy*.

The school shall inform the local authority of any pupil who is going to be added to or deleted from the school’s admission register at non-standard transition points in accordance with the requirements of The School Attendance (Pupil Registration) (England) Regulations 2024. This will assist the local authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education; and
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school’s permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Action will be taken in accordance with this policy if any absence of a pupil from the school gives rise to a concern about their welfare. The school's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child Abduction and Community Safety Incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends) and by strangers.

Other community safety incidents in the vicinity of the school can raise concerns amongst parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Emanuel School gives their pupils practical advice on how to keep themselves safe, e.g. through life education and/or assemblies. These lessons focus on building confidence and abilities rather than creating a climate of fear or simply warning them about all strangers.

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

Cyber-dependent crimes include:

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

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there is a concern about a child in this area, the DSL/DDSL may consider referring into the Cyber Choices programme (*nationwide police programme supported by the Home Office and led by the National Crime Agency*). The objective of the program is to encourage pupils to use their cyber skills positively by highlighting alternative opportunities, along with providing victim awareness and deterrents, such as the potential penalties for continuing along the cybercriminal pathway.

Additional advice can be found in the guidance NPCC – When to Call the Police.

Preventing Radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat 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.

The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism

and can popularise views which terrorists exploit. The school is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The school's curriculum promotes tolerance and respect for diverse views, while challenging prejudice of any kind. The school is an inclusive school which values citizenship and a sense of belonging. Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

It is possible to protect susceptible people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. Staff should be alerted to changes in children's behaviour which could indicate that they may need help or protection. School staff are regularly reminded to use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: to the Channel programme, having consulted [Channel Duty Guidance: Protecting Vulnerable People from being drawn into Terrorism \(HM Government, February 2021\)](#).

The DfE and Home Office's briefing note [The use of Social Media for Online Radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

As with all matters pertaining to the maintenance of a safeguarding culture within the school, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.

Early indicators of radicalisation or extremism may include:

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

If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes and advice would be sought from colleagues in LA (either Prevent co-ordinator or safeguarding services) if necessary.

The school supports the **Prevent Strategy**, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism.

Emanuel School will ensure that staff are provided with appropriate training and information to enable them to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and identify any child who may be at risk and how to support them. The school will also ensure that children are safe from terrorist and extremist material when accessing the internet in school. Concerns will be discussed with the child's parents whenever possible and with the Local Authority Prevent co-ordinator and referrals made to the Channel programme when appropriate.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, the school understands that this does not, and should not, replace a referral to the local authority's children's social care where a child has been harmed or is at risk of harm. The school recognises that in some cases 16 - 18-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs, support available and how to refer to them to the NRM is available in the *statutory guidance Modern Slavery: How to Identify and Support Victims* (May 2022).

Mental Health: 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. These experiences can impact on a child's mental health, behaviour and education.

Potential Signs of Abuse

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury,
- several different explanations provided for an injury,
- unexplained delay in seeking treatment,
- the parents/carers are uninterested or undisturbed by an accident or an injury,
- parents are absent without good reason when their child is presented for treatment,
- repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury,
- family use of different doctors and A&E departments,
- reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- any bruising to a pre-crawling or pre-walking baby,
- bruising in or around the mouth, particularly in small babies which may indicate force feeding,

- two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive),
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally,
- variation in colour possibly indicating injuries caused at different times,
- the outline of an object used e.g. belt marks, hand prints or a hair brush,
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting,
- bruising around the face,
- grasp marks on small children,
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine),
- linear burns from hot metal rods or electrical fire elements,
- burns of uniform depth over a large area,
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks),
- old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation,
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent with the fracture type.
- there are associated old fractures.
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- there is an unexplained fracture in the first year of life.

Scars

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

Behavioural Indications

Some children may behave in ways that alert a staff member to the possibility of physical injury, for example:

- withdrawal from physical contact,
- fear of returning home,
- self-destructive tendencies,
- aggression towards others.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- aggressive behaviour towards others
- scape-goated within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a 'loner' – difficulty relating to others
- over-reaction to mistakes
- fear of new situations
- inappropriate responses to painful situations
- neurotic behaviours
- self-harming
- running away

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care,
- a child seen to be listless, apathetic and unresponsive with no apparent medical cause,
- Failure of child to grow within normal expected pattern, with accompanying weight loss,
- child thrives away from home environment,
- child frequently absent from or late for school,
- child left with adults who are intoxicated or violent,
- child abandoned or left alone for excessive periods,
- compulsive stealing or scavenging.

Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate for the child's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorder, self-mutilation and suicide attempts)
- involvement in prostitution or indiscriminate choice of sexual partners

- an anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- concerning changes in behaviour or general presentation
- regressive behaviour
- distrust of a particular adult
- unexplained gifts of money
- sleep disturbances or nightmares
- phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- pain or itching of genital area,
- blood on underclothes,
- pregnancy in a younger girl where the identity of the father is disclosed,
- physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing,
- wetting or soiling.

Recognising Child-on-Child Abuse

This can include (*but is not limited to*):

- bullying,
- abuse within intimate partner relationships,
- physical abuse such as hitting, kicking, shaking, biting, hair pulling,
- sexual violence and harassment,
- consensual and non-consensual sharing of nude and semi-nude images and/or videos,
- causing someone to engage in sexual activity with a third party,
- upskirting and initiation/hazing type rituals.

Appendix 2: Child-on-Child Abuse

The school recognises that children of any age are capable of abusing other children and that this can happen inside and/or outside of school (including online) and works to minimise the risk of child-on-child abuse and will deal with any allegations robustly.

The school will adopt a zero-tolerance approach to abuse. Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up' as downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse. Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

It is recognised that even if there are no reported cases of child-on-child abuse at the school, such abuse may still be taking place; it may be the case that it is just not being reported. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion in accordance with the procedures in this policy.

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this section of the policy, 'child' refers to any child or young person up to the age of 18 years.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) put children in danger.

Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships (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 (see 'Harmful Sexual Behaviour' below) possibly with an online element which encourages sexual violence;
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse (see 'Harmful Sexual Behaviour' below);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, 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 victim humiliation, distress or alarm;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (*also previously known as sexting or youth produced sexual imagery*) meaning the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop (see below); 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*).

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse

and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is of a serious nature, possibly including a criminal offence
- refers to a pupil's behaviour towards a more vulnerable pupil (including where there is a difference in age)
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

The school takes steps to minimise the risk of all types of child-on-child abuse. Staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. The school has robust anti-bullying procedures in place (see the school's *Anti-Bullying Policy*) and pupils are taught at all stages of the school about acceptable behaviour and how to keep themselves safe as part of the Life Education programme (see the *Life Education Policy* and *Relationships and Sex Education Policy*). Appropriate action is taken to protect pupils identified as being at risk including the particular vulnerabilities of those with a special educational need or disability. If needed a bespoke pupil safety plan is implemented.

The school and its staff:

- have adopted a whole school approach to child-on-child abuse;
- recognise the need to reassure those wishing to make a report that they are being taken seriously and will be supported and kept safe, and the need to support everyone involved;
- understand how technology can form a significant component in safeguarding and wellbeing issues (including in relation to sexual violence and physical abuse), and what the risks associated with child-on-child abuse online are and what they may look like;
- are aware that child-on-child abuse can be hidden and will act on the basis that it is happening in school;
- are aware that such abuse may occur outside of school and that it should be reported and the risks to the child managed wherever it occurs;
- are aware of the need to record the outcome and ensure a proportionate response;
- make it clear that segregation can be used as a support measure (not just to prevent collusion);
- challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken;
- understand that taking appropriate action will involve supporting all members of the school community who may be involved as a priority. This may require investigation by the school or other agencies.

Harmful Sexual Behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The school recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online or offline (both physical and verbal) or simultaneously between the two, and the school recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all child-on-child abuse, is never acceptable and will be taken seriously. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual

violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The school will respond to allegations seriously and all victims will be offered appropriate support.

The school is aware of the importance of:

- maintaining an attitude of 'it could happen here', particularly with regards to child-on-child abuse;
- making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child-on-child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

The school recognises that sexual violence and sexual harassment occurring online (*either in isolation or in connection with face-to-face incidents*) can introduce a number of complex factors including widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. The school will always consider support from UK Safer Internet Centre, Internet Watch Foundation, Childline/IVF (Report Remove), ThinkUKnow and other organisations.

The school will consider intra familial harms and whether any support for siblings is necessary following an incident.

KCSIE 2024 - Part 5 <i>Child on Child Sexual Violence and Sexual Harassment</i> provides further detailed advice.

Incidents of Nudes and Semi-Nudes Being Shared

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes. Sharing nudes and semi-nudes means the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18. This could be via social media (including Snapchat), gaming platforms, chat apps (incl. WhatsApp/iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images. The images, videos or live streams may include more than one child.

Consensual and non-consensual sharing of nude images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The school follows the guidance given by the [UK Council for Internet Safety \(UKCIS\): Sharing Nudes and Semi-Nudes \(March 2024\)](#) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and members of the safeguarding team.
- carrying out interviews with the children involved (if appropriate).
- informing parents at an early stage and keep them involved in the process in order to best support the pupil unless there is a good reason to believe that involving them would put the child at risk of harm. *Any decision not to inform them will be made in conjunction with other services such as children's social care and/or the police.*
- carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point of the process.

If not, the incident can be handled in accordance with the UKCIS guidance and the school's *Behaviour Policy*. If it is determined that there is a risk of harm, the DSL will make a referral to children's social care and/or police immediately.

All incidents relating to nudes and semi-nudes being shared will be recorded, whether they have been referred externally or not. The school will record the reason for not reporting incidents externally and ensure it is signed off by the headmaster.

Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. All child-on-child abuse is unacceptable and will be taken seriously.

There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Process

When an instance of child-on-child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, staff should contact the DSL or deputies. The DSL (or deputy) will make a referral to children's social care, CAMHS and police as appropriate in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues.

Where the allegation relates to an incident that took place within the school, or relates to pupils attending the same school, the school will take all appropriate action to ensure the safety and welfare and continued education of all pupils including the alleged perpetrator. The following are examples of action the school may take:

- Take advice from children's social care and / or the police, as appropriate, on when and how to inform the pupil and his / her parents about the allegations and how investigation of such allegations will be conducted.
- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation. A pupil against whom an allegation of abuse has been made may be suspended from the school as a neutral measure during the investigation.
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident(s).
- Keep a detailed log of actions, discussions and decisions.
- Assess the risk and implement a pupil safety plan as necessary – ensure that non-teaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times.
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening comments.
- Consider whether the situation warrants information being shared with other parents in the school (e.g. where press coverage is likely) and seek advice from relevant agencies.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

The school will take advice from children's social care and / or the police, as appropriate, on how the investigation of such allegations will be conducted.

Appropriate support will be provided to all pupils involved by the school's pastoral team, and pupils may be referred to the school's counselling services. Support from external services will be requested as necessary.

Appendix 3: Visitors and Arrangements for use of School Premises for Non-School Activities

On site, teaching staff and support staff wear blue lanyards carrying the school name/logo. Teachers and support staff also have an ID badge with their name (*members of the Senior Management Team also have their job title*). Behind the badge, there is a card containing essential about safeguarding and emergency procedures at Emanuel School.

All other visitors to the school are expected to sign in at the gatehouse and they will receive a sticker or badge dependant on the purpose of the visit.

School governors wear a black lanyard with 'governor' written across it and a named ID card. Visitors get a paper and plastic wallet from the gatehouse, with the following lanyard colours:

- **Green** - Supply teachers, agency staff, contracted staff and long-term third-party contractors (estates) with DBS clearance
- **Red** – Visitors, including all leavers, third-party contractors (estates) without DBS clearance and visiting speakers. Visitors with red lanyards must report to reception and be escorted throughout the duration of their visit.
- **Yellow** - School Inspectors

Stickers are given to visitors who:

- will not enter the school buildings (*e.g. parents attending sporting events during the week*)
- attend school events such as drama or musical productions.

Large scale events such as open days need to be pre-booked and require a ticket. Visitors will only be able to come on site with a valid ticket.

Refer to the *Visiting Speakers Policy* for procedures to follow when arranging a visiting speaker to the school.

Arrangements for use of School Premises for Non-School Activities

Where the governing body hires or rents out the school premises to organisations or individuals (for example, to community groups, sports associations, and service providers) to run community or extra-curricular activities, it will ensure that appropriate arrangements are in place to keep children safe.

When services or activities at the school are provided by the governing body under the direct supervision or management of school staff, the school's *Safeguarding and Child Protection Policy* and procedures will apply in relation to any safeguarding concerns or allegations.

Where services or activities are provided by a separate body and not under the direct supervision or management of the school, the governing body will seek assurance that the individual or organisation concerned has appropriate safeguarding and child protection policies and procedures in place, which the school will inspect, and ensure that there are arrangements in place for the individual or organisation to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The school will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use.

The governing body will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and any failure by the provider to comply with this will lead to termination of the agreement.

When considering what safeguarding arrangements providers should have in place, the school will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022).

In the event that the school receives an allegation relating to an external provider that uses the school premises, the school will contact the LADO to seek further guidance.

Appendix 4: Safeguarding Protocol for Offsite Sports Grounds

External sites used by the school:

- All Stars Tennis, Wandsworth Common
- Blagdens Sports Ground, New Malden
- Emanuel School Boat Club, Dukes Meadow
- Millennium Arena, Battersea
- Southbank Sports Club, South Lambeth Spencer Hockey Club, Earlsfield
- Spencer Hockey Club, Earlsfield
- Surbiton Hockey Club, Surbiton
- Wandsworth Common
- Wimbledon Park Watersports and Outdoor Centre, Wimbledon

Scheduling

The school schedules its sporting activities at external venues to ensure that there is no crossover with the arrival and departure with other groups that use the facility. This prevents crossover of groups at the facilities and in particular in the changing areas. The school adopts a principle of ensuring the pupils can change with dignity, decency and privacy when needed, be it for reasons of physical development or other individual needs.

When the school uses external facilities, members of staff will check the facility on arrival and report any concerns about the condition of the facility to the host and the director of Sport, where possible before the start of the session.

The school establishes an understanding with other groups that share the facilities. During the period of use the school decides normal operating procedure (OP) and the emergency action plan (EAP).

Transportation to External Sports Facilities

Public Transport

The school utilises public rail and buses to transport pupils to and from external sports facilities. Pupils are accompanied by a member of staff competent in discipline, control and organisation and dealing with any crisis that may arise.

Pupils in Y9-Y13 do travel to external facilities on public transport unaccompanied. Parental consent is requested and secured before pupils are permitted to travel independently.

School Minibuses

All pupils are allocated a forward-facing seat with seatbelt and the driver is responsible for ensuring all seatbelts are worn.

Private Hire Coaches

The school uses a reputable transport company to provide coach travel. The coaches are fitted with seatbelts and pupils are supervised throughout the travel time by competent staff.

Appendix 5: Procedures Regarding Allegations Against Staff

The school's procedure for managing allegations against staff is set out below but may be varied according to the specific circumstances of the allegation. The school will ensure that appropriate action is taken to address concerns that are raised under this procedure.

The headmaster (*or, if the concern relates to the headmaster, the Chair of Governors or the Nominated Governor for Safeguarding and Child Protection*) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, the headmaster, the Chair of Governors and the Nominated Governor for Safeguarding and Child Protection have all been trained to assess concerns, and to record and address them appropriately.

If the school determines the concern is a low-level concern, then the school will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the school's capability or disciplinary procedures.

In borderline cases, the headmaster (*or, if the concern relates to the headmaster, the Chair of Governors or the Nominated Governor for Safeguarding and Child Protection*) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

Where the headmaster (*or, if the concern relates to the headmaster, the Chair of Governors*) considers the concerns raised potentially meet the harm threshold, the headmaster (*or, if the concern relates to the headmaster, the Chair of Governors*) will make a report to the LADO before further action is taken. The headmaster (*or, if the concern relates to the headmaster, the Chair of Governors*) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

Where an allegation is made that may meet the harm threshold, the school will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The school will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.

Where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "**case manager**" will be appointed by the school to lead the investigation. The case manager will be either the headmaster or a person with appropriate authority appointed by the headmaster. Where the headmaster is the subject of an allegation, the case manager will usually be either the Chair of Governors or the Nominated Governor for Safeguarding and Child Protection.

Disclosure of Information

The case manager will consult with the LADO in order to agree if and when it is appropriate to inform an accused person of an allegation. If it is appropriate to inform the individual of the allegation against them, the case manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

The case manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The case manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which

they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a case manager has been appointed to investigate an allegation, the case manager will consult with the LADO before sharing any information with the individual's employer.

Further Action to be taken by the School

A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with Part 4 of KCSIE and the school's employment procedures.

A member of staff (or worker) resigning, retiring or ceasing to provide services during the period between an allegation being made and the case being concluded, should not prevent the relevant processes being completed.

Ceasing to use staff

If the school ceases to use the services of a member of staff because they have harmed or pose a risk of harm to a child, a referral to the Disclosure and Barring Service (**DBS**) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the proprietor without delay. The school may also need to consider a referral to the DBS if a member of staff is suspended or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the school in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met. Refer to DfE guidance [Making barring referrals to the DBS](#) for further information.

Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (**TRA**) should be made where a teacher has been dismissed or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

Record Keeping

Low level concerns will be recorded electronically via the neutral notifications button on Firefly. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under the school's procedures, will also be stored securely in a central file (Neutral Notifications Records).

The Neutral Notifications Record will set out the name of the individual involved (*if an individual is named*), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the school will try to accommodate this as far as reasonably possible but cannot guarantee anonymity in all circumstances.

Details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Neutral Notifications Record. The individual's personnel file and the Neutral Notifications Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

The Neutral Notifications Record is stored on SharePoint and only accessible by the headmaster and Designated Safeguarding Lead (DSL).

Details of low-level concerns and allegations found to be malicious or false will be removed from personnel records and the Neutral Notifications Record.

In line with the school's *Data Retention Policy*, information stored on staff personnel files about low-level concerns and allegations that may meet the harm threshold, and the Neutral Notifications Record, will be retained by the school indefinitely. The school may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

References

Low level concerns: low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the school's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

Allegations that meet the harm threshold: allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The school will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

Conclusion

At the conclusion of a case where an individual has been suspended and may return to work, support for that individual will be discussed in advance. This may include a phased return, mentoring or specific support. Contact with the person who made the allegation will also be discussed so that it can be proactively managed.

At the conclusion of a case where an allegation is determined to be unsubstantiated or malicious, the LADO may refer the matter to children's social care services to assess whether there are other services that they need, or if abuse has happened with someone else. Where an allegation is proven to be deliberately invented or malicious, the headmaster may consider disciplinary action against the pupil. Where such an allegation has not come from a pupil, the police may be asked if any action should be taken against the person responsible.

At the conclusion of any case where an allegation has been made against a member of staff, the DSLs should review the circumstances of the case with the headmaster, to determine any lessons that may be learned, to improve procedures or practice within the school and prevent any future incidents.

WCSP have produced a resource outlining the process for dealing with allegations about staff which can be accessed [here](#).

Appendix 6: Safeguarding for Online Learning and Teaching

This document sets out Emanuel School's guidelines to ensuring that teachers and pupils can teach and learn safely in an online environment.

Reporting Concerns

Pupils, parents and staff have a 'button' on their Firefly dashboard allowing them to report any pastoral concerns. The safeguarding team will monitor these and support anyone that reports a concern and take follow up action as appropriate.

Staff should be proactive in reporting any safeguarding incidents or potential concerns.

Online Learning Platforms

The school has developed an online teaching provision using a number of platforms to provide pupils with a thorough and safe learning experience, which staff must access using school user accounts. Where a teacher wishes to consider using a new platform, this must be discussed with the director of studies and head of IT before being used with any pupils.

Video and Audio calls

When communicating with pupils in the online environment, teachers should be mindful to maintain the same professional standards they would in a physical school setting. Staff should ensure that their attire is appropriate for a school environment and are required to use an appropriate virtual or blurred background.

A number of measures have been put in place to safeguard staff and pupils:

1. When pupils join a class online they will be placed in the 'waiting room'. Teachers will only admit those that they recognise from the 'waiting room'.
2. Teachers can lock a class once all pupils have joined.
3. Pupils will not be able to private message each other
4. Pupils will see a notification if a teacher chooses to record a class

Group video and audio calls

- When teaching in an interactive environment, teachers should remind pupils regularly of appropriate behaviour and expectations. If a pupil becomes disruptive, the teacher should initially issue a verbal warning and reminder of expectations. The teacher can consider moving the pupil causing disruption into the waiting room for a short period.
- If there is an issue during a lesson, this should be reported on EMA or to the appropriate member of the pastoral team.

1-to-1 video and audio calls

Protocols around one-to-one meetings between staff and pupils have been adapted to reflect the online environment and ensure that the school replicates the safeguarding arrangements that would be in place in the physical school setting as much as possible.

- Before arranging a 1-to-1 video or audio call with a pupil, the teacher should seek approval. For academic matters this is the deputy head: academic, and for pastoral matters the appropriate head of section (with the deputy head: pupils/designated safeguarding lead informed).
- Details of the meeting should be emailed to the pupil, and parents and appropriate head of department or head of section must be copied into the email. This would allow the HoD or HoS to drop in, very much in the way they could in a physical setting.

- All 1-to-1 video conferences should be recorded with consent from the parents. These will be automatically stored on the school network. *Recording sessions gives teachers an additional layer of protection.*
- 1-to-1 audio calls do not need to be recorded. A teacher can choose whether to call via *Teams*, or to a telephone number agreed with the parents.
- Encourage parents to be present at the beginning of a meeting and where appropriate, advise that the door is left open to the room the pupil is in.
- If using *Teams*, a meeting should be scheduled so it is recorded in the calendar.
- Teachers should use a landline at school where possible. If a teacher must use their personal mobile, they must make sure their number is hidden by prefacing the dialled number with 141 and ensure they do not store any pupil or parent number in their phone.
- A record that the call took place, and where appropriate, the outcome of the discussion should be made in EMA.
- Should it become necessary to speak with a child without the parents' prior knowledge (e.g. in the case of a serious safeguarding concern), this must only be done with express permission from the deputy head: pupils/designated safeguarding lead.

Communicating with students undertaking re-sits

For staff supporting leavers who are preparing for re-sits, it is important that the appropriate protocols are followed for staff and pupil protection.

Staff are reminded that they remain in a position of responsibility and the relationship with the pupil should continue in the professional manner it would within any pupil still attending the school and within the boundaries of the staff code of conduct.

Staff who are concerned by any interaction with a pupil where they feel their own behaviour may be misconstrued or misinterpreted, or the pupil presents or acts in a way that could be deemed inappropriate or at odds with the normal teacher-pupil relationship should report this using neutral notifications or speak directly with the DSL. It is important that any such concerns are reported at the time. Refer to the Supporting Students undertaking Re-sits guidance for further information.

Appendix 7: Supporting Resources & Guidance

London Child Protection Procedures: <https://www.londoncp.co.uk/>

Wandsworth Child Protection Partnership Resources: <https://wscp.org.uk/>

HM Government | [Information Sharing – Advice for Practitioners](#) | May 2024

DfE | [Keeping Children Safe in Education](#) | September 2024

HM Government | [What to Do if You are Worried a Child is Being Abused](#) | March 2015

DfE | Statutory Guidance | [Working Together to Safeguard Children](#) | 2023

DfE | [Searching, Screening and Confiscation – Advice for Schools](#) | September 2022

DfE | [Children Missing Education](#) | August 2024

DfE | [Relationships education, relationships and sex education and health education guidance](#) | September 2021

DfE | [After-School Clubs, Community Activities and Tuition: Safeguarding Guidance for Providers](#) | September 2023

DfE | [Working Together to Improve School Attendance](#) | August 2024

DfE | [Behaviour in Schools](#) | February 2024

HM Government | [Multi Agency Guidance on FGM](#) | July 2020

DfE | [Meeting Digital and Technology Standards in Schools and Colleges](#)

Charity Commission

Charity Commission | [Strategy for Dealing with Safeguarding Issues in Charities](#) | December 2017

Charity Commission | [How to Report a Serious Incident in your Charity](#) | June 2019

Charity Commission | [Reporting a serious incident in your charity when it involves a partner](#) | December 2019

Charity Commission | [Report serious wrongdoing at a charity as a worker or volunteer](#) | June 2019

Department for Digital, Culture, Media and Sport | [Guidance on Reporting Safeguarding Concerns in a Charity](#) | March 2022

Whistleblowing

General guidance can be found at <https://www.gov.uk/whistleblowing>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Online Safety

DfE | [Teaching Online Safety in Schools](#) | January 2023

UKCIS | [Sharing Nudes and Semi-Nudes](#) | Advice for Education Settings | March 2024

UKCIS | [Sharing Nudes and Semi-Nudes – How to Respond to an Incident](#) | March 2024

UK Council for Internet Safety (UKCIS) | [Education for a Connected World](#) | June 2020

Internet Matters | [Vulnerable Children in a Digital World](#)

[Harmful online challenges and online hoaxes](#) (DfE, February 2021)

Child-On-Child Abuse

Farrer & Co | [Addressing Child-On-Child Abuse – A Resource for Schools](#) | September 2024

Honour Based Abuse (incl. FGM/Forced Marriage)

HM Government | [Multi-Agency Statutory Guidance on Female Genital Mutilation](#) | July 2020

Home Office | [Female Genital Mutilation – Mandatory Reporting Factsheet](#)

GOV UK | [Forced Marriage Guidance](#)

Home Office/DfE | [Mandatory Reporting of Female Genital Mutilation: Procedural Information](#)

Mental Health and Wellbeing

DfE | [Mental Health and Behaviour in Schools \(November 2018\)](#)
[Every Mind Matters](#) (Materials and Lesson Plans)

Extremism & Radicalisation

Educate Against Hate | [Warning Signs of Radicalisation](#)
Channel Duty Guidance | [Protecting Vulnerable People from Being Drawn into Terrorism](#) | HM
Government February 2021
HM Government | [Prevent Duty Guidance](#) | 2023
LGfL | [Prevent Resources](#)

Domestic Abuse

Operation Encompass [Resources for Schools](#)
Safe Young Lives | [Young People and Domestic Abuse](#)
NSPCC | [Domestic Abuse – Signs, Symptoms, Effects](#)
[Refuge](#) | For women and children. Against domestic violence.

Exploitation

Home Office | [Criminal Exploitation of Children and Vulnerable Adults](#) | [County Lines Guidance](#)
DfE | [Child Sexual Exploitation – Definition and Guide for Practitioners](#) | February 2017

[When to Call the Police – Guidance for Schools and Colleges \(NPCC\)](#)

Appendix 8: Reporting a Concern

Please follow the procedure described in *Reporting a Concern/Guidance on Receiving a Disclosure* (see 'Procedures') when completing this form.

1.	Name of person(s) reporting the concern	
2.	Date when concern happened	
3.	Location where concern happened	
4.	Name(s) and form of pupil(s) involved	
5.	Name(s) of others involved (if applicable)	
6.	Description of the concern. Provide facts (<i>not opinions</i>) and the pupil(s)' own words. If relevant and visible, state the area of the body affected.	
7.	Signature	
8.	Date	

You must not expect or ask a pupil to either undress or show areas of their body for evidence which cannot be seen under normal clothing.

This form should be completed as soon as possible.

When filling in this form, it is essential that facts (*not opinions*) are recorded. Pupils and parents may be entitled to see any written information on this matter. If in doubt please discuss the matter first with the DSL or, in their absence, one of their deputies.

Discretion is very important in these cases and, once the incident has been reported, colleagues should not discuss the matter any further with other parties, either now or at any point in the future.

Appendix 9: Neutral Notification Form

If a child is at immediate risk, and you are not able to contact a member of the safeguarding team, you should contact Wandsworth MASH immediately on 020 8150 1362 or email mash@wandsworth.gov.uk

Please complete this form if you wish to make a neutral notification. This may relate to your own behaviour or actions where you feel it could be misconstrued or misinterpreted or to report any behaviour by an adult towards a pupil or another child that may have concerned you.

If you are unsure as to whether or not to complete this form, you should seek advice from the DSL or a member of the safeguarding team.

Further information and guidance can be found in the *Neutral Notifications Guidance*.

Name*	
<p>Please outline what you have seen or what has happened, providing all the details you think are relevant.</p> <p>Please also include relevant dates and the names of any colleagues or pupils involved or who may also have witnessed what happened: *</p>	
Any information which may be relevant	