

## SAFEGUARDING AND CHILD PROTECTION POLICY

**This policy is applicable to the whole School community, and thus is relevant to both the Alleyn's Junior and Senior Schools.** It includes those pupils in the Early Years Foundation Stage (EYFS). The policy is applicable to all on and off-site activities undertaken by pupils while they are the responsibility of the School.

Alleyn's School has a duty of care to all its pupils, staff and visitors. Specifically, the School has a responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of all pupils at the School. In the statutory publication, Keeping Children Safe in Education (September 2016), safeguarding and the promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and, taking action to enable all children to have the best outcomes. **Everyone in the staff community at Alleyn's takes responsibility for safeguarding, and we shall always intend to act in the best interests of the child.**

In accordance with the Children Act (2004), Section 1 (i), **'The child's welfare shall be the paramount...consideration'**, therefore, the School aims to provide a safe environment for its pupils, and as part of its child protection responsibilities, to identify pupils who are suffering, or likely to suffer, significant harm and to take action to ensure that pupils are safe at school and at home.

**'Harm'** means ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill treatment of another. **'Development'** covers physical, intellectual, emotional, social or behavioural development. **'Health'** means physical or mental health. **'Ill-treatment'** includes emotional abuse, neglect, physical and sexual abuse.

This Safeguarding Policy is available to all parents and pupils via the Hub and the School website and printed copies are available upon request. An 'Alleyn's Post' with a link to this Safeguarding and Child Protection Policy is sent at the start of the academic year to all parents, and explains where to find the policy. This policy is also lodged with ISI (the Independent Schools Inspectorate).

The School's Child Protection (CP) policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2002 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools), and the guidance contained in *"Working Together to Safeguard Children"* (2015), the DfE's statutory guidance *"Keeping children safe in education"* (Sep 2016), Ofsted Guidance and procedures produced by the London Safeguarding Children Board (LSCB) and the Southwark Safeguarding Children Board (SSCB). We also have regard to the advice contained in DfE's, *"What to do if you're worried a child is being abused"* and *"Information Sharing – Advice for practitioners"* (SSCB).

This policy has been revised using advice from the Local (Southwark) Schools Safeguarding Officer (August 2017).

Alleyn's School will ensure that all staff read at least Part One and Annex A of DfE guidance: Keeping children safe in education (Sep '16) (KCSIE) and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One. **Staff are reminded to adopt an attitude of 'it could happen here', and that safeguarding is everybody's business at Alleyn's.**

When considering safeguarding issues, regard should also be given to related Alleyn's School policies, where applicable in the Senior (SS) and Junior (JS) Schools: Mental Health and Well-being;

IT; Pupil Code of Conduct; Staff Code of Conduct (JS)/Practice (SS); Anti-bullying; Educational Visits; Use of Physical Force; Complaints; Whistle-blowing; Equal Opportunities; Rewards and Sanctions; Recruitment; New staff induction; First Aid; Health and Safety.

### **Policy Statement and Aims**

#### **Statement:**

**Alleyn's School is fully committed, and fully recognises the contribution it can make, to providing a safe environment for children, staff and visitors. It promotes a climate where anyone in the community can freely share their concerns about themselves, or others, in terms of individual safety and well-being. We aim to protect the interests of the children at Alleyn's through awareness among all the members of staff of the kinds of issues of abuse, maltreatment and neglect that would form a legitimate concern about the child's safety and protection. In this way, Alleyn's seeks to support its pupils' development in ways that will foster security, confidence and independence. It aims to provide an environment in which children and young people feel safe, secure, valued and respected, and know how to approach adults if they – or those whom they know – are in difficulties, with the assurance that they will be listened to. It acknowledges that safeguarding incidents can happen anywhere and therefore staff should be alert to possible concerns about life outside school being raised in the School. Alleyn's seeks always to act in the best interests of the child.**

There are three main elements to our safeguarding culture to ensure it is fully and effectively implemented:

1. Prevention: (e.g. supportive school atmosphere; teaching and pastoral support available to pupils, including the PSHE curriculum teaching children to keep themselves safe; following safe recruitment practices);
2. Protection: (e.g. by following agreed procedures and monitoring their implementation; by ensuring staff are trained and supported appropriately and sensitively in safeguarding matters; by encouraging open communication with all parts of the School community);
3. Support: (for pupils and staff, including those who may have been abused or are vulnerable; outlining how complaints will be handled; ensuring good channels of communication on safeguarding concerns).

The School will work together with other agencies to ensure adequate arrangements are in place to identify, assess, and support those children who are suffering harm.

The School has a duty under 'Prevent' obligations resulting from the Counter-Terrorism and Security Act 2015 to ensure that its pupils are safe from the risk of radicalisation or extremism leading to the possibility of terrorism activity.

In aiming to keep children safe from danger outside school, the School pays regard to the need for care about those missing in education (using the recently published guidance, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)). The School reminds its pastoral staff to keep clear records of attendance, and the registers at school are maintained daily and in rigorous fashion. The School has electronic admissions and register systems that enables the Designated Safeguarding Lead to know if a pupil does not take up a place unexpectedly, or if a pupil has a concerning pattern of attendance. Such concerns are raised with the local authority children's social care.

Alleyn's School recognises the need to address the kinds of abuse (paras 35-40) and specific safeguarding issues raised (paras 43-4) and Annex A of KCSIE (Sep '16). (Details of these are both in this policy and also contained in the Appendix.)

### **Policy aims**

The purpose of this policy is to:

- Identify the names, offices and contact details of those people at the school with lead responsibility for safeguarding;
- Outline the purpose of the role of the Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Leads (DDSLs);
- Outline the training staff receive in safeguarding and child protection;
- State the School's concern to ensure that children with any special educational need or disability (SEND) are monitored carefully and their ability to flourish is guaranteed;
- Outline the types of abuse and neglect for which staff must have regard with specific details on particular safeguarding issues (elaborated on in the Appendix);
- Indicate the action to be taken when concerns about children occur;
- Outline the recruitment procedure adopted by Alleyn's, and make reference to the different groups who come into supervisory contact with the children;
- Outline the role of the Governing Board (which has a link Governor who liaises regularly with the DSL) in their oversight of good safeguarding practice at the School;
- Point out further matters specific to best practice in promoting a rigorous safeguarding culture at Alleyn's.

### Key Personnel and contact lists

Safeguarding children at Alleyn's School is the responsibility of the whole staff community. All adults working in this School (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse, neglect or relevant child protection concerns to the Designated Safeguarding Lead (DSL). Staff are also aware of the identity of the Deputy DSLs.

Safeguarding Role	Name	Title	Contact & office
Designated Safeguarding Lead (DSL) and Designated Child Protection Officer (DCPO) – and Prevent lead whole School	<b>Andy Skinnard</b>	Senior Deputy Head  Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 1457  Office is behind Reception, ask at Reception for whereabouts
Deputy Designated Safeguarding Lead (DDSL) - Senior School	<b>Rob Atkinson</b>	Assistant Head, Head of Upper School  Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 1485  Office is on the first floor of the EAB, opposite the sectional administrators' office
DDSL - Senior School	<b>Mel Joel</b>	Assistant Head, Head of Middle School  Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 1014  Office is on the first floor of the EAB, next to the sectional administrators' office
DDSL - Senior School	<b>Stuart Turner</b>	Assistant Head, Head of Lower School  Member of SMT	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 8032  Office is in the temporary LS building, in the car park behind the Library
DDSL - Alleyn's Junior School and Responsibility for EYFS	<b>Simon Severino</b>	Headmaster, Alleyn's Junior School  Member of SMT	<a href="mailto:jssafeguarding@alleyns.org.uk">jssafeguarding@alleyns.org.uk</a>  0208 557 1495  Office is at the end of the corridor immediately after the Reception area of the AJS building
DDSL - Alleyn's Junior School (AJS) Deputy responsibility for EYFS	<b>Erica Olley</b>	Deputy Head, Alleyn's Junior School	<a href="mailto:safeguarding@alleyns.org.uk">safeguarding@alleyns.org.uk</a>  0208 557 1536  Office is along the corridor immediately after the Reception area of the AJS building
DDSL - whole School Support Staff	<b>David Wicksteed</b>	Human Resources Consultant	<a href="mailto:hr@alleyns.org.uk">hr@alleyns.org.uk</a>  0208 613 5004  Office is
Link Governor for Safeguarding – whole School and EYFS	<b>Dr Frances Bowen</b>	Deputy Chair of Governors	<a href="mailto:safeguardinglink@alleyns.org.uk">safeguardinglink@alleyns.org.uk</a>

The Chairman of Governors is **Mr Iain Barbour** and he can be contacted c/o Clerk to the Governors, **Mrs D Rawstron**, 10 St Bride Street, London EC4A 4AD.

The School's Local Safeguarding Children Board (LSCB) is **Southwark**, which operates the Southwark Safeguarding Children Board (SSCB), working under the advice and support of the London Safeguarding Children's Board. We liaise with the Southwark Schools Safeguarding Co-ordinator, the office of the Local Area Designated Officer (LADO) and the Southwark Multi Agency Safeguarding Hub (MASH) team. Staff are regularly reminded about their statutory requirement that they should pass on any safeguarding concerns. They are aware of whom they can contact at Alleyn's **but they are also reminded that they may raise concerns directly with Children's Social Care Services.**

**Southwark** contacts (the School would usually contact the borough agencies where the pupil resides):

<b>Title</b>	<b>Name</b>	<b>Purpose</b>	<b>Contact details</b>
<b>Local Area Designated Officer (LADO)</b>	Eva Simcock	Concerns about any adult in supervisory work roles with children	<b>020 7525 0689</b> <b>Eva.Simcock@southwark.gov.uk</b> Head of Social Work Improvement and Quality Assurance, Sumner House, Sumner Road, London SE15 5QS
<b>Southwark Multi-Agency Safeguarding Hub (MASH)</b>	Duty worker	For concerns not related to adults in supervisory work roles with children	<b>0207 525 1921</b>  <b>Out of hours: 0207 525 5000</b>  <b>RAD@southwark.gov.uk</b>
<b>Early Help service</b>	Duty worker	For concerns that may not require further referral, but meetings or mediation	<b>020 7525 2714</b>  <b>EarlyHelp@southwark.gov.uk</b>
<b>Children's Social Care Services</b>	Duty worker	For concerns at any stage unable to be dealt with by the offices above	From 9am-5pm: <b>020 7525 1921</b>  Out of hours: <b>020 7525 5000</b>
<b>Southwark Safeguarding Coordinator</b>	Apo ÇAĞIRICI	Advice for schools and information coordinator on safeguarding for Southwark schools	<b>020 7525 2715</b>
<b>Southwark Safeguarding Children Board</b>	Chair: Michael O'Connor		<b>0207 525 3306</b>  <b>Southwark Council, PO Box 64529, London, SE1 2TZ</b>  <b>southwark.gov.uk/safeguardingchildren</b>

Other external referral contacts:

<b>Metropolitan Police</b>	Child Abuse Investigation Team	020 7230 3700
<b>Prevent Duty</b>	Department for Education helpline	020 7340 7264
<b>Forced Marriage Unit</b>	Advice for staff	020 7008 0151
<b>CAMHS</b>	Duty practitioner for mental health	020 3228 7777
<b>Mental Health out of hours</b>	24 hour coverage for concerns	0800 731 2864

External sources of advice:

<b>NSPCC Child Protection Helpline</b>	24-hour freephone service for adults, children or young people for advice or to give details about a child who may be at risk	0808 800 5000
<b>ChildLine</b>	24-hour freephone for children and young people who need advice	0800 1111
<b>Family Lives</b>	A freephone advice line for parents	0808 800 2222
<b>NSPCC whistleblowing helpline</b>	Available for staff who do not feel able to raise concerns regarding child protection failures internally	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Public Concern at Work</b>	Available for staff who are concerned about management of safeguarding issues	0207 404 6609 <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a>

### The roles of the Designated Safeguarding Lead (DSL) and the Deputy DSLs

The DSL at Alleyn's is the Senior Deputy Head and he reports regularly to the link governor for safeguarding, and compiling reports with the link governor for briefings to governors at Board meetings. The DSL takes responsibility for training the staff and governors, who receive the same safeguarding and updates training as members of staff. The Deputy DSLs are trained to the same level as the DSL.

The broad areas of responsibility for the designated safeguarding lead (DSL) are:

In **managing referrals and recording concerns**, the DSL will:

- Refer all cases of suspected abuse to the local authority children's social care, involving the LADO in cases of suspected abuse by adults in a supervisory role with children at Alleyn's;
- Pass on to the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) any relevant concerns;
- Contact the police (in cases where a crime may have been committed);
- Inform the Headmaster of any referrals (and contact lawyers for advice where relevant);
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Be alert to the specific needs of children in need, *e.g.* those with special educational needs, analysing trends and taking note of factors which might indicate special concerns (in this, looking out for those who act as young carers);
- Meet regularly with the DDSLs in both the Senior School and AJS in order to assess current safeguarding concerns and to maintain the culture of concern about safeguarding and child protection at Alleyn's;
- Keep detailed, accurate, secure written records of concerns and referrals, and compile a weekly list of safeguarding concerns for a regular meeting with the Headmaster in management of concerns;
- 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.

The DSL should receive **appropriate training** in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Be aware of the appropriate channels for the variety of safeguarding concerns that might need referral, or advice being sought;
- 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;
- Ensure each member of staff has access to, and understands, the School's safeguarding and child protection policy and procedures, ensuring especially that new and part time members of staff are trained prior to coming into supervisory contact with children.

**Raising Awareness** - the DSL should ensure the School's policies are known and used appropriately, and will:

- Ensure the School's Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and bring the policy to the governing body for its awareness of any changes and its current content;
- Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- Provide regular updates, shared by various media, to keep staff informed, between specific training sessions, about safeguarding issues;
- Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

**The role of the DDSL is to:**

- Act as a deputy for the DSL, being available to any member of staff – at all times, including when the DSL is present – for sharing concerns about the interests of children at the School;
- Maintain specific interest in her/his area of school responsibility in order to feed relevant information to the DSL for safeguarding records;
- Take relevant training, in line with the DSL, in order to achieve awareness as stated above for the DSL's training;
- Be a significant driver in promoting the culture of concern about safeguarding and child protection at Alleyn's;
- In the Junior School, work in the EYFS is led by the DDSL, the Headmaster and his Deputy who is also a DDSL.

**The role of the Board of Governors**

The Governors will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. Governors are expected to receive appropriate training on safeguarding at induction that is updated regularly. In addition, they should receive information (for example, via emails, e-bulletins and newsletters) on safeguarding and child protection at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people and vulnerable adults.

A 'link Governor' for safeguarding maintains a close relationship with the DSL and has a termly meeting with the HR Consultant, the Headmaster of the Junior School and the DSL in order to inspect the Single Central Register and review current practice. The link Governor meets the DSL who reports on particular safeguarding matters at other times during the term.

The Governors will ensure that the school contributes to inter-agency working in line with statutory guidance *"Working Together to Safeguard Children"* (2015) and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the SSCB.

The Governors formally adopt this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated governor or the Headmaster.

### **Staff Training**

The Designated Safeguarding Lead (DSL) will receive full safeguarding training, including training in child protection and inter-/multi-agency work from the Southwark local authority or an approved external training-provider, and update that training at least every two years. The Deputy Designated Safeguarding Leads (DDSLs) will also have individual training provided by Southwark Social Services or an approved training provider, to the same level as the DSL. This is updated every two years. The DSL advises on appropriate training for all constituencies of the School in consultation with the LSCB.

The whole Board of Governors receive safeguarding training, and the link governor with responsibility for safeguarding receives separate training. The Headmaster attends separate training and the whole staff will receive regular safeguarding training as appropriate, but which will occur at least once every three years and be conducted by the DSL or an external provider.

New teaching and co-curricular staff, including volunteers (*e.g.* the AJSA Committee members, adults helping with co-curricular activities) with unsupervised access to pupils, and temporary staff will receive initial training on safeguarding issues from the DSL in the Senior School and the DDSL in the Junior School, as part of the induction process and before they have contact with pupils. The Safeguarding and Child Protection Policy is available to all staff electronically on the School intranet (the Hub), and on the School website or in hard copy from the DSL's office.

New staff who have responsibilities for teaching in specialist areas – specifically one-to-one music tuition and sports coaching are reminded of the particular need for care in discharging their duties according to the School's safeguarding procedures.

Support staff receive initial safeguarding training from the DDSL [Human Resources Consultant], and the whole staff (academic, support and volunteers) meets for training each year for updates organised by the DSL. Other updates are delivered during the year at staff training sessions.

Individual training on safeguarding issues is available through the CPD budget and staff can approach the Deputy Head [Personnel and Administration] and the Headmaster of the AJS regarding such training needs. Temporary and voluntary staff who work with children will be made aware of Safeguarding arrangements by either the DSL, the DDSL (Human Resources Consultant) or the DDSL (AJS Headmaster).

*"KCSIE: Statutory guidance for schools and colleges"* (Sep 2016) Part 1, and Annex A is required reading for all staff, volunteers and governors, and is available on the Hub. Relevant training is provided for all governors.

This policy is published in the Staff Handbook, which is updated annually.

The DDSL [Human Resources Consultant] keeps a log of all staff training in safeguarding and child protection, and this is reviewed each term with the Link Governor and at a meeting of the SCR with the Headmaster, Headmaster of the AJS and DSL.

### Induction of new staff

All new staff who have any supervisory contact with children are informed at a specific session run by the DSL that they must read "*KCSIE: Statutory guidance for schools and colleges*" (Sep 2016) Part 1 and Annex A. They sign an acknowledgment of reading and understanding the document. In addition, new staff are given a training session on the School's pupil conduct expectations (the Pupil Code of Conduct) the whistleblowing procedures (in a policy in the staff handbook) and they must sign an Acceptable Use Policy for use of the School's IT facilities, including specific material about use of social media.

### Pupil matters

#### Types of child abuse and neglect [also displayed in SS teaching staff's planners]

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (*e.g.* via the internet). They may be abused by an adult or adults or 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from

home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**In addition, staff must be made aware, through updates from the DSL and through training, of the following safeguarding issues, as detailed in para 43 of KCSIE (Sep 2016):**

Child missing from education; Child missing from home or care; CSE; Bullying including cyberbullying; Domestic violence; Drugs; Fabricated or induced illness; Faith abuse; FGM; Forced marriage; Gangs and youth violence; Gender-based violence/violence against women and girls; Mental health; Private fostering; Preventing radicalisation (channel panels and separate police hotline); Sexting; Teenage relationship abuse; Trafficking.

**[For further details see Annex A of KCSIE (Sep '16) in Appendix A]**

### **Child Sexual Exploitation (CSE)**

In February 2017 there was a fresh definition of CSE published in an amendment to Working Together to Safeguard Children (2015), <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners> "Child sexual exploitation 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 or young person under the age of 18 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. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Signs that sexual exploitation may be taking place are listed in the Appendix to this document.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

The government guidance document on CSE (Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (February 2017), says (p.5) "*Like all forms of child sexual abuse, child sexual exploitation:*

- *can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;*
- *can still be abuse even if the sexual activity appears consensual;*

- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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."

At Alleyn's we:

- Recognise that CSE is never the victim's fault, and are guided by recent government advice, as quoted from above;
- raise the issue of CSE in various parts of the curriculum including PSICHE;
- maintain a good culture of communication to ensure parents and any child worried about CSE can speak to the School;
- refer immediately to Children's Services where it comes to our notice that a child under the age of 18 may be vulnerable to sexual exploitation;
- engage with relevant agencies in any detected or suspected case of CSE affecting a pupil.

### **'Sexting'**

Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) ['Sexting in schools and colleges'](#).

### **So-called, honour based violence**

In Annex A of KCSIE (Sep '16) it states: "So-called honour based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals

and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators that HBV might be taking place include those indicators that apply to CSE, FGM and forced marriage, and further details, and links, can be found in the Appendix to this policy.

### **Female Genital Mutilation (FGM)**

FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. FGM causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. It is practised by families for a variety of complex reasons but often in the belief that it is beneficial for the girl or woman. FGM is practised in 28 African countries as well as in parts of the Middle East and Asia. The practice is illegal in the UK. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls. The girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to "heal" before they return to school. Some girls may have FGM performed in the UK. FGM is child abuse and a form of violence against women and girls (VWAG).

At Alleyn's we:

- emphasise the mandatory reporting duty for teachers personally to report to the police cases where they discover that an act of FGM appears to have been carried out, bearing in mind that staff must not engage in examining girls for this purpose;
- include the issues raised by FGM in the SS RS curriculum – and what students must do if they suspect another pupil is vulnerable in PSCH lessons;
- engage with staff (both academic and support) in training opportunities to raise awareness, especially in addressing signs of abuse specially like FGM;
- raise concern in other age-appropriate forums, like Assemblies and occasional talks in Clubs & Societies.

Guidance is provided by the Department of Health (March 2015) and is available at:

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm> [See also pp16-17 and (for advice on the role of schools and colleges) pp42-44 of the Multi-agency Practice Guidelines.]

**[See Appendix G for examples (not exhaustive) of possible indicators of vulnerability to FGM.]**

### **Forced Marriage**

Young girls are frequently in a state of fear of being forced – or actually ARE forced – to marry. This usually involves missed education but of course it restricts personal development and flourishing in significant ways.

In line with the advice contained in Multi-agency practice guidelines: Handling cases of Forced Marriage (June 2014), at Alleyn's we:

- include material on forced marriage in the curriculum, especially in RS and PSCH;

- train staff on the matter and ensure signs of possible vulnerability are known by both academic and support staff;
- encourage the pupils to discuss concerns about friends or themselves with adult members of the community, never treating the allegation as merely a domestic issue and sending the student back home;
- check where possible to establish if a vulnerable student possesses two passports;
- with concerns about the safety of an under 18 year old pupil activate safeguarding procedures using multi-agency liaison with police and children's social care;
- use the Forced Marriage Unit in the Foreign & Commonwealth office for support – details, Telephone: +44 (0) 20 7008 0151, Email: [fmufco.gov.uk](mailto:fmufco.gov.uk)

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk).

**[See Appendix F for possible indicators of pupils vulnerable to forced marriage.]**

### **Preventing Radicalisation – 'Prevent'**

The Prevent lead at Alleyn's is the DSL (the Senior Deputy Head). The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into extremism through radicalisation and the possible participation in terrorism ('the Prevent duty' – referred to simply as 'Prevent'). Young people can be exposed to extremist influences or prejudiced views, in particular via the internet and other social media. Schools can help to protect children from extremist and violent views in the same way that they help to safeguard children in other behavioural contexts. In KCSIE (Sep '16) "radicalisation refers to the process by which a person comes to support terrorism and forms of extremism... Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." Also included in the definition are..."calls for the death of members of our armed services, whether in this country or overseas."

In order to meet its obligations under Prevent, at Alleyn's we:

- Ensure the DSL receives appropriate Prevent training, and train appropriate staff (including the Headmaster) in Prevent issues making use of LSCB courses and reading matter, and available material like on-line films drawing attention also to the risk of Child Sexual Exploitation in radicalisation;
- highlight the issues involved in Prevent at both academic and support staff training sessions, including spotting signs of radicalisation or extremism and identifying Child Sexual Exploitation radicalisation, and ensuring staff awareness of the appropriate use of the Channel Panel system through training;
- engage in a process of general assessment of risk by:
  - use by the DSL and relevant staff of a Prevent self-assessment form (for example the one provided by Oxfordshire schools);
  - maintaining discussion between pastoral staff with a view to identifying pupils with any signs or vulnerability due to behavioural factors;

- checking at intake and during a pupil's time at the School any possible geographical issues that might be relevant (*e.g.*, changing address or being aware of holidays spent in vulnerable areas of the world);
- maintain vigilance about pupil/student attendance such that any child missing from education can be reported to the authorities immediately;
- are especially vigilant on pupils missing from school deploying the electronic registration system to spot problematic absence leading to concerns about missing from education;
- are vigilant about detecting abusive or derogatory language in the pupils, which may indicate vulnerability to radicalisation and extremism, or an unhealthy attitude to the issue at large in our society, checking especially for racist, homophobic or disability discriminatory language;
- at any sign of vulnerability in any of its student make contact with relevant authorities possibly making a referral to the local Channel Panel or using the DfE dedicated helpline – such referrals do not require parental consent to make but consultation may be judged to be helpful;
- check that any visiting speaker is always suitably vetted and supervised especially if invited to speak by pupils (where a member of staff must always take responsibility for knowing beforehand the profile of the visitor and take responsibility for the visit);
- include sessions on fundamental British values designed to raise the issues in Prevent widely in the curriculum, including – but not exhaustively – in PSHE lessons;
- include opportunities for addressing fundamental British values in the co-curriculum and public events like Assemblies, Year group meetings *etc.*;
- reiterate in the IT Policy the particular danger of radicalisation and vulnerability to extremism posed by social media;
- Ensure there are robust IT protections to keep pupils safe from terrorist and extremist materials when accessing the internet at school.

There is the possibility for any member of staff to contact the local police force using the 101 non-emergency number and a DfE dedicated telephone helpline/mailbox offering non-emergency advice for staff and governors on 020 7340 7264 and online at [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

At Alleyn's we recognise that is no single route to extremism nor is there a simple profile of those who become involved. Thus, attempts to derive a 'profile' can be misleading. It must not be assumed that particular characteristics and experiences will necessarily lead to individuals becoming radicalised, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. Further information is contained in the statutory guidance for Channel Panel members and partners of local panels, *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism*, found at: <https://www.gov.uk/government/publications/prevent-duty-guidance> and see *Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.* <https://www.gov.uk/government/publications/channel-guidance>

We received guidance from Southwark in 2017 offering further advice and support in Prevent issues, and the DSL can make contact with Southwark to attend further events in support of managing the Prevent Duty. (See "*Prevent Duty – Support for Southwark Schools*" May 2017.)

**Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub (MASH). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

**[See Appendix D for examples (not exhaustive) of possible indicators of vulnerability to radicalisation or extremism.]**

### **Child Missing from Education (CME)**

It is a mandatory duty for the School to have in place systems to report children who go missing from education. This duty reflects the need to protect those vulnerable to radicalisation or sexual exploitation, or sexual abuse. In September 2016, the government published guidance, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

In addition, Southwark Council has published separate advice in: "*Children Missing Education Protocol. Southwark Children's & Adults Services, February 2017*". Here it states:

"Keeping children safe in education: statutory guidance for schools and colleges' (Sep 2016) states that 'School and college staff members should follow the school's or college's procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future... Governing bodies and proprietors should put in place appropriate safeguarding responses to children who go missing from education'.

All schools (including maintained, academy, free and independent schools) must inform the Local Authority when they are about to add or delete a pupil's name from the school admission register for any reason. This applies to all children with the exception of those starting or leaving school at standard transition points, *i.e.* at the start of the first year and completion of the final year of education normally provided by that school. The legal basis for these duties is set out in Education (Pupil Registration) (England) (Amendment) Regulations 2016, with further details in Annex A of 'Keeping children safe in education' (DfE 2016) and 'School Attendance: Guidance for maintained schools, academies, independent schools and local authorities' (DfE, 2016).

Schools must notify the local authority within five days when a pupil's name is added to the admission register, and must notify the local authority when a pupil's name is to be deleted from the admission register as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register."

As a result, at Alleyn's, we:

- raise staff awareness in training to the danger posed by pupils missing regular education;

- monitor the absence list produced daily by the Section Administrators, and the AJS Office;
- Report to the appropriate Local Authority any case of concern about patterns of absence, and at the latest after 10 days of unpermitted absence;
- include the absence data in the formal school reports of Senior School pupils;
- contact home in cases of unauthorised absence to remind parents of the School protocol on what constitutes authorised absence;
- bring cases of concern to the DSL for further action if appropriate.

**Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that Southwark Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub (MASH) by emailing MASH@southwark.gov.uk or calling 020 7525 1921. Advice about whether there is a need to notify the council, can be obtained by calling 07539 346808 or sending an email to privatefosteringadvice@southwark.gov.uk.

**Peer abuse, bullying, cyberbullying and sexting**

Taken from <https://www.gov.uk/government/publications/preventing-and-tackling-bullying> (July 2017 p. 6) "When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. Where this is the case, the school staff should discuss with the school's designated safeguarding lead and report their concerns to their local authority children's social care and work with them to take appropriate action. Full details can be found in Part 1 of Keeping Children Safe in Education". Alleyn's has an anti-bullying policy which reflects the most recent (July 2017) government guidance on the prevention and dealing with bullying and cyberbullying, alongside previously published guidance on cyberbullying. The matter is addressed in PSCHE and other forums in school, like House and Section assemblies. There are robust procedures to ensure bullying is addressed quickly and effectively, and the Headmaster signs a log of any cases of bullying managed, initially, by the Head of Section, in his regular safeguarding meeting with the DSL. Both schools maintain logs of alleged bullying and these are summarised for governors. Alleyn's recognises the need for children to be aware that what is termed 'banter' can stop people reporting actual bullying behaviour, and this is addressed in PSCHE sessions with the pupils. In KCSIE (Sep 2016) it states: "All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse".

An incident of bullying, which is one – but not the only – form of pupil against pupil abuse, will be treated as a safeguarding concern, when there is reasonable cause to suspect that a child is

suffering, or likely to suffer, significant harm. Peer abuse, which often occurs online or through use of social media, is tackled formally through the PSCH programme, and is raised regularly as a topic of importance in communication with pupils, parents and with staff in their supervisory capacity. Sexting is raised as a specific issue of concern online.

As part of helping in the development of a healthy, safer lifestyle, lessons address, for example, how:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to recognise the dangers of peer abuse when pressure from others (including people they know) threatens pupils' personal safety and well-being; including knowing when and where to get help;
- to apply assertiveness techniques to resist unhelpful pressure;
- to judge what kinds of physical contact are acceptable and unacceptable;
- to appreciate the value of emotional literacy and ways of achieving it.

In both Schools' anti-bullying policies the definition of bullying states: *Bullying is the wilful desire to hurt another, physically, verbally or emotionally and to put him/her under stress. The intimidation can be and often is repeated and is usually carried out by those individuals or groups who are more powerful. On-lookers to incidents of bullying can be seen as complicit.* The anti-bullying policies set out the ways in which the School addresses the compromise that bullying and peer abuse can bring to the flourishing of individuals. Regularly in the School year the issue of bullying is raised in Assemblies or in tutor time.

Attention is paid to the need to support victims of peer abuse, bullying and cyberbullying, including sexting. Pupils are reminded to whom they can go for support, alongside specific guidance in PSCH lessons and different forums where the matters are discussed.

Alleyn's School follows the recently published advice on sexting and cyberbullying in schools:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.2439\\_K\\_G\\_NCA\\_Sexting\\_in\\_Schools\\_WEB\\_1\\_PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_K_G_NCA_Sexting_in_Schools_WEB_1_PDF)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374850/Cyberbullying\\_Advice\\_for\\_Headteachers\\_and\\_School\\_Staff\\_121114.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

### **Listening to Children and the Curriculum and Co-curriculum**

The School encourages its pupils to talk to an appropriate adult member of staff when they have concerns about themselves or others. In each Tutor Room and classroom there is a notice giving details of whom a pupil could contact if unsure, and pastoral staff remind their pupils that they are encouraged to speak to members of staff with any concerns, and these will not be treated as trivial. The School advertises the offices of the Chaplain and the School Counsellor (and Assistant Counsellor) and how pupils may make contact with these members of staff.

The School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of life in London and elsewhere, adult life and citizenship. Central to this is the work of the Head of PSCH, but all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. Alleyn's prominently displays its Vision and Values in its SS classrooms and emphasises the importance of values and its positive school ethos with the centrality of respect for others in various parts of the curriculum and daily life at school as part of its promotion of fundamental British values.

The School regularly discusses the matter of how children can keep safe in their use of social media and online. The SS has a system of Digital Mentors, where older pupils guide younger ones in advising them on safe activity with information technology. All pupils sign an 'Acceptable Use of IT' form which – for older pupils – includes mention of mindful behaviour online and in social media, and also mentions fundamental British values.

We also consider how the curriculum and co-curriculum can help in:

- developing a school ethos and environment which encourages safe and healthy lifestyle for pupils;
- ensuring that food and drink available across the school day reinforce the healthy lifestyle message;
- providing high quality Physical Education and sport to promote physical activity;
- appreciating a sense of 'the other' aside from purely materialistic interpretations of the meaning of life, enabling an appreciation of what constitutes a spiritual understanding
- encouraging a sense of gratitude for the opportunities we have in our community of Alleyn's and the wider British society;
- promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and well-being both as an individual and as part of wider modern British society.

### **Specific children with safeguarding needs**

#### **Early Years Foundation Stage (EYFS)**

Children are in the Early Years Foundation Stage until the end of the academic year in which they have their fifth birthday. At Alleyn's Junior School (AJS) this is called the Reception Class. The DDSL with Safeguarding responsibility for the EYFS is the Headmaster, Mr Simon Severino, and his Deputy, Miss Erica Olley assists, and she is also a DDSL. With regard to the welfare of children in EYFS, School policy is based on the '*Statutory framework for the early years foundation stage*' (effective April 2017).

This whole school safeguarding and child protection policy applies to the EYFS. The following points apply to the Junior School, due to it containing an EYFS setting:

- AJS does not permit the taking of photographs of children without the consent of parents. The whole school safeguarding policy and the AJS Staff Code of Conduct provide clear guidance regarding the use of mobile phones and cameras.
- Personal mobile phones, cameras and video recording equipment should not be used in the EYFS setting. Instead, school equipment should be used for such purposes as taking photographs, video films and recording observations.
- As part of the safer recruitment of new staff and checks on existing staff who work within AJS, the School will not knowingly employ staff who have been disqualified from working with children or who are disqualified by association (if others who work in their households are 'disqualified'). This is achieved by informing relevant people of the legislation, including that they may be disqualified by association, and providing annual reminders of this legislation; taking steps to gather sufficient and accurate information about whether any member of staff is disqualified, including by association; noting such checks on the School's Single Central Register.

### **Pupils with SEND**

The School regularly offers training for staff in issues to do with special educational need (SEN) and any staff working with children with disability will receive appropriate briefings from appropriate staff both in and outside Alleyn's. Alleyn's recognises the increased vulnerability of pupils with SEND to possible bullying and safeguarding concern, and the DSL regularly confers with the Head of Learning Support and other relevant pastoral staff in support of pupils with SEND. On the safeguarding register there is a column to identify if the child listed is on the register of those with special educational need.

### **Vulnerable Pupils**

Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a looked-after child, this will also be brought to the notice of the Local Authority DSL with responsibility for children in public care. If pupils disclose that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue. We acknowledge the additional need for support and protection of children who are vulnerable by virtue of disability, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions and pupils who are excluded from school.

We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. The School has a strong commitment to its Anti-bullying Policy and will consider all coercive acts and inappropriate child-on-child behaviour and sexual activity within a Child Protection context.

The law requires that Southwark Children's Services are notified of private fostering arrangements. Any privately fostered children, *i.e.* children under the age of 16 (under 18 if disabled) who are cared for 28 days or more by someone who is not their parent or a close relative, that come to our attention will be referred to Children's Services. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

### **Staff-Pupil Relations – the Staff Code of Practice**

It is illegal for any member of staff to have sexual relations with a pupil under the age of 18, even if the pupil is over 16 and gives consent. All members of academic staff in the SS and JS are subject to a Staff Code of Conduct (JS) or Practice (SS) which includes sections on pupil welfare and the importance of setting the right example to children. Section 1 of this Code of Practice states the following:

1. *ensuring the welfare of pupils in the School by:*
  - a. *following the relevant policies e.g. Safeguarding, Health and Safety, Anti-bullying, IT and E-safety;*
  - b. *maintaining appropriate professional relationships with pupils.*
2. *supporting the holistic development of pupils by:*
  - a. *contributing to and supporting the pastoral work of the School.*
3. *providing an example to pupils by:*
  - a. *performing their duties in a professional manner;*
  - b. *acting as appropriate role models in School, in their behaviour and dress;*
  - c. *respecting others regardless of age, gender identity, sexual orientation, disability, race, religion, beliefs or socio-economic background.*

Support staff receive the same safeguarding training and updates as the academic staff and are regularly made aware of the School's expectation that all members of staff contribute to the work of safeguarding at the School.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the School's Rewards and Sanctions Policy and the Use of Physical Force Policy, which underlines that there are no circumstances in which corporal punishment can be applied.

Advice for full-time, part-time, temporary, teaching, and support staff, volunteers and visitors about appropriate behaviour in and out of school is contained in either the Staff Handbook under 'Staff-Pupil Relations' (SS) or in the Staff Code of Conduct (JS). This advice should be read in conjunction with this policy and is available to staff electronically on the Hub and in hard copy from the Senior Deputy Head. Staff are reminded to be alert to the possibility of malicious allegations, and encouraged never to permit any tuition or consultation behind a closed door without a viewing window.

Staff are reminded (usually in staff training opportunities during the year) that their behaviour and actions should not place pupils or themselves at risk of harm or of allegations of harm to a pupil. Staff must observe the 'Staff-pupil relations' guidance in the Staff Handbook (SS) or Code of Conduct (JS) relating to: one-to-one tuition; sports coaching; conveying a pupil by car; appropriate electronic communication with a pupil; use of School digital technology resources and systems; home visits; tutoring; use of physical force; administering first-aid; social contact with pupils outside school, and so on.

Except in cases of emergency, First Aid will be administered only by qualified First Aiders. Staff should be aware of the School's Whistle-blowing Policy and share immediately any disclosure or concern that relates to a member of staff with the Headmaster or one of the Designated Safeguarding Team if the Headmaster is not available and nothing should be said to the colleague involved. It should be shared with the Chairman of Governors if it relates to the Headmaster. Staff are reminded at regular training opportunities that the pertinent school policies for Safeguarding are: Safeguarding Policy; Pupils' Social & Emotional wellbeing & Mental Health Policy; IT and E-safety Policy; Whistle-blowing Policy; Equal Opportunities Policy; Anti-bullying Policy; Recruitment Policy, Health and Safety and First Aid Policy.

### **What to do with concerns about a child – safeguarding referrals**

**If the concern is about suspected FGM having been carried out, the police must be contacted immediately by the teacher. If the concern is that the child is in immediate danger, then a referral to children's social care OR the police must be made immediately.**

**Alleyn's will always intend to act in the best interests of the child.** The School has a responsibility to protect all pupils in its care and all staff share the duty to safeguard and promote the welfare of our pupils. The term 'welfare' is taken to embrace health, happiness, development (physical, intellectual, social and behavioural) and protection from risk of suffering harm. The welfare of pupils applies equally during the school day and during out-of-school activities, including visits over the weekend and holidays, or term-time residential trips off-site. The welfare of the pupils at home, or when they are not under the responsibility of the School, is also our concern. The DSL is therefore also obliged to consider a pupil's welfare if he learns of an incident which has occurred outside school.

Staff members are encouraged to consider safeguarding cases in terms of whether there is concern, a case of a child in need, or a case of the risk of circumstances of significant harm. All staff are encouraged to speak to the DSL and DDSs, and that no concern will be treated as trivial. But staff are reminded that they may contact children's social care directly. If a member of staff does contact the local authority, they must inform the DSL straight away afterwards.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

The Southwark Safeguarding Board Multi Agency Threshold Guide sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by Southwark agencies.

Safeguarding referrals should be made to Southwark Multi Agency Safeguarding Hub (MASH) via Inter Agency Referral Form (IARF) a Common Assessment Framework (CAF) form and copied to the LA's Schools Safeguarding Coordinator. Prior to any written CAF IARF being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on 020 7525 1921, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Violence, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

A Common Assessment Framework (CAF) form will be used for referrals to Early Help Service (EHS). In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents applying for places at this school will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

Alleyn's School recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks

Referral to the LADO is made when concerns involve adults in the School. There is also a diagram from KCSIE to guide staff in Appendix C. If early help is used, the member of staff may be required to help with information following disclosures from the child. Early help involves mediation from different groups in the best interests of the child.

A Common Assessment Framework (CAF) form will be used for referrals to Early Help Service (EHS).

The DSL is also the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the School's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the DSL, he will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the DSL and the member of staff reporting the concern, advice will be sought from a DDSL, the LA's Strategic Lead Officer for safeguarding in education services or the Early Help Service (EHS) Duty Manager. Staff are reminded that there is a whistle-blowing protocol that assists if a member of staff feels a safeguarding concern is not being managed appropriately.

Staff are reminded that if a child makes a disclosure to them, **they can never guarantee secrecy or confidentiality** and that they should **never ask leading questions or see their role as one of investigation**. Any conversations in a disclosure must have notes recorded as soon as possible in order to be logged securely at school with the DSL who can make them available to the statutory authorities.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse or threats to remove the child during the school day, for example involving forced marriage concerns, urgent Police intervention will be requested.

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation by children's social care and the police, if social care decides to engage them.

In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible.

Prospective parents/guardians pursuing an interest in places at Alleyn's for their children are informed at Open Day presentations of our safeguarding responsibilities.

Alleyn's School recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks including, for example, the management of entrances to the School.

Staff members may come across situations which do not, in themselves, constitute a safeguarding concern, but if repeated, or noticed by others, might legitimately be of concern. We encourage the sharing of any concerns through our training procedures. No incident or situation would be treated lightly, and we encourage discussions with the DSL so the fullest picture can emerge.

**If staff members, following passing on safeguarding information to the DSL or a DDSL, feel that appropriate actions have not been taken, or the safeguarding concern is not being noticeably resolved/addressed, and they do not feel able to raise concerns internally then they are**

**encouraged to use the School's whistleblowing policy or call the NSPCC for advice on: 0800 028 0285. There is also a Public Concern at Work helpline on: 0207 404 6609.**

Parental awareness will normally be established before making a referral to Children's Social Care (Children's Services). The School will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

In line with KCSIE, the School will consider reporting historical abuse allegations to the Police.

### **Complaints/allegations about staff/volunteers/the DSL/the Headmaster**

Complaints or allegations made against staff/volunteers/the DSL will be brought immediately to the attention of the Headmaster in order that he may activate the appropriate procedures through the office of the LADO. If the complaint is about the Headmaster, or in the Headmaster's absence, the person to contact is the Chairman of Governors.

Allegations will be managed according to the following procedure:

1. The complaint or allegation must be reported without delay to the Headmaster, unless the complaint concerns the behaviour of the Headmaster, who will not be informed if the complaint is about him.
2. The Headmaster will contact the LADO within 24 hours of receiving the complaint/allegation.
3. The Headmaster will not conduct his own investigation in order that statutory investigations are not jeopardised, but he will ask the person making the complaint/allegation to write a detailed account of his/her concerns.
4. The compilation of the report from the person making the complaint/allegation must not be aided by the Headmaster.
5. The Headmaster must not require parental consent before contacting the LADO.
6. This report is stored in a locked cabinet and held securely.
7. After the complaint/allegation is investigated by the statutory authorities, the appropriate referring is made by the School to relevant agencies.

If an allegation is made against a teacher the quick resolution of that allegation will be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. The following points are relevant:

1. All allegations are brought to the attention of the Headmaster (except where the allegation concerns the Headmaster) and the LADO is contacted immediately to agree a course of action and possible involvement of the police.
2. In borderline cases the LADO may be contacted for informal discussion without naming the School or individual;
3. In response to an allegation, staff suspension will not be the default option. An individual will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons.
4. Allegations against a teacher or other member of staff who is no longer working will be referred to the DBS.
5. If an allegation is made in relation to the Headmaster, the DSL will report directly to the Chairman of Governors, without informing the Headmaster of that report.
6. There are four possible outcomes following an investigation into an allegation against staff: substantiated, malicious, false, and unsubstantiated.

7. An allegation that is found to have been malicious will be removed from personnel records and any that is not substantiated, is unfounded or malicious will not be referred to in employer references. Allegations that are found to have been malicious are likely to have breached School policy and are proscribed in the Whistle-blowing Policy. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

If the allegation concerns alleged minor physical mishandling or verbal abuse, this will normally be dealt with under the School's Complaints Procedure, unless one or more of the following criteria applies:

- The allegation is one of actual bodily harm – *i.e.*, an injury has necessitated first aid or medical treatment;
- There is reason to suspect parental instigation or collusion;
- The allegation has been reported to the Police or Children's Services by the parent or child;
- The child is Looked After in Public Care;
- The child is subject to a Child Protection plan or a Child in Need plan;
- The child has a disability or Statement of Special Educational Need;
- The member of staff concerned has been subject to previous complaints;
- The allegation is one of sexual abuse.

In these cases, advice will be sought from the relevant professionals in the local authority or the LADO with a view to a Strategy Meeting or Discussion being held in accordance with the SSCB (Southwark Safeguarding Children's Board) safeguarding procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

In considering whether or not a referral to Children's Social Care Services is appropriate, the Headmaster may seek advice from the Link Governor for Safeguarding, the Chairman of Governors, Southwark's Professional Advisor for Safeguarding in Education, the LADO and other relevant external agencies.

### **Recruitment procedure**

Safe recruitment procedures operate. Disclosure and Barring Service checks are carried out in compliance with the Independent Schools' Standards Regulation (ISSR – Feb '16) and include pre-appointment checks on volunteers, staff of contractors and other individuals that are not school staff or supply staff, and are completed according to the requirements set out in Keeping Children Safe in Education (Sep '16). The School has an induction policy for new staff.

The School has put in place safer recruitment procedures that adhere to statutory requirements and updates these in light of any legislative requirements.

A Single Central Record is held for all staff and all others who work in regular contact with children, including volunteers, which includes identity, barred list check, enhanced DBS check, prohibition from teaching check, qualification and health checks, right to work checks, further checks on people living or working outside the UK, reference checks and checks made against the NCTL's Teacher Services. The Single Central Record is reviewed before the start of each term at the Single Central Record Review Meeting, which is attended by relevant members of Senior Management and the Human Resources Consultant.

At Alleyn's we:

- check all members of staff are for their suitability to work with children through the Disclosure and Barring Service at Enhanced level;
- carry out a check against the barred list where it is appropriate and permitted to do so; Obtain written notification that appropriate child protection checks and procedures apply to any staff employed by another organisation, including those working with the School's pupils on another site (for example, using a separate institution);
- check that such staff presenting themselves are the ones on whom the checks were made;
- only employ staff after receiving and logging at least two references;
- ensure that there is at least one person on every recruitment panel has completed the NSPCC Safer Recruitment training. Currently the Headmaster, Senior Deputy Head and Deputy Head [Personnel and Administration] have completed the training;
- hold a regular meeting between the DSL and Deputy DL, Headmaster of the Junior School with the governor with responsibility for safeguarding, and at that meeting an update on the Single Central Meeting is given by the Human Resources Consultant.

### **DBS Barring Referrals**

The Headmaster is required by statute to make a referral to the Disclosure and Barring Service within one month of any person leaving the School, (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. This referral must be made using the DBS Referral Form and posted to the DBS Barring Referrals address below. Failure to make a report constitutes an offence. The DBS Barring Referrals address is: PO Box 181, Darlington, DL1 9FA (tel: 01325 953725).

(Note: Ceasing to use a person's services includes: dismissal; removal; resignation; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; voluntary withdrawal from supply teaching; contract working; a course of initial teacher training, or volunteering.)

Alleyn's School also acknowledges a duty to consider making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

(The reasons such an order would be considered are: "unacceptable professional conduct"; "conduct that may bring the profession into disrepute"; or "a conviction, at any time, for a relevant offence". Where a dismissal does not reach the threshold for DBS referral, separate consideration will be given to an NCTL referral. All DBS referrals are automatically relayed to the NCTL.

### **Volunteers**

Governors will be regarded as unsupervised and will therefore be subject to enhanced DBS checks. Volunteers and Governors will be subject to the relevant sections of the Staff Code of Practice, although volunteers who do not have unsupervised access to pupils are not statutorily required to receive enhanced DBS checks. Any parent or other person/organisation engaged by the School to work in a voluntary capacity with pupils will be subjected to all reasonable vetting procedures and also DBS checks if the activity requires unsupervised access to pupils. Those who volunteer regularly will be required to register with the DBS update service.

Where it is not appropriate to instigate an enhanced DBS check for volunteers (such as for a one-off event), they may be required to provide references and will be asked to sign a declaration that they have not been convicted of any criminal or disciplinary offence which could preclude their working with children at the School. In the AJS all members of the AJSA committee have a DBS check.

Pupils who work as ushers in the MCT are given a safeguarding briefing prior to taking on the work.

### **Third-party groups**

This Safeguarding Policy will be brought to the attention of organisers of third party groups using the School facilities and applies to them if there are children aged under 18 on the site. Voluntary sector groups that operate within the School, provide off-site services for our pupils, or use school facilities, will be expected either to adhere to this Safeguarding Policy or to operate a policy which is compliant with the requirements of the Southwark Safeguarding Children Board.

### **Contractors**

Contractors who work regularly at the school and may be unsupervised are required to have undergone a DBS check.

Occasional contractors will be supervised during their work at the School, when the work is being undertaken during term time. Such occasional contractors are given a visitors' badge on which is printed further instructions for the safety of the School community and the visitor.

### **Visitors**

All visitors during the school day are required on arrival to sign in at Townley Lodge or the Junior School Lodge. Visitors will be issued with an appropriately coloured visitor's badge-lanyard on which is printed further instructions for the safety of both the visitor and the School community. Visitors should remain under the supervision of a member of staff at all times and be escorted back to the Lodge where the badge must be returned. Staff are encouraged to engage any unidentified visitor and ask what her or his business is, and, if unsure, the visitor must be reported immediately to Townley Lodge or the Junior School Lodge.

### **Other issues relating to best practice**

#### **Site Security**

No internal doors to classrooms will be locked while pupils are present in these areas.

Entry to School premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Authorised visitors to the School will be logged into and out of the premises and will be issued with School visitor badges with brief safeguarding information on the reverse. Unidentified visitors will be challenged by staff or reported to the Headmaster or School Security at Townley Lodge. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the School or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the Police through appropriate systems.

#### **Admissions, Attendance and School Roll**

All parents applying for places at the School will be informed of our safeguarding responsibilities and the existence of this policy.

The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate.

Any pupil who is absent without permission for 10 days, or whose pattern of attendance causes concern will be referred to the relevant Local Authority equivalent, and vigilance is applied mindful of the risks for pupils associated with going missing from education.

If a pupil is withdrawn from the School having not reached the normal date of transfer due to a family move or any other reason, all efforts will be made to identify any new address and the School to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Early Help Service either through the EHS Duty Officer or through the local team manager in order that they might make further enquiries. If this school receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from the School's Admissions Register in accordance with the Pupil Registration Regulations or with the authorisation of the Local Team Manager in the Early Help Service.**

#### **School residential trips**

The Senior Deputy Head (DSL) and the Deputy Head of the AJS (DDSL) routinely sign off all trips involving any overnight staying. If a pupil on the Safeguarding list of concerns is included in that trip, the Senior Deputy and Deputy Head of the AJS will consult with the relevant member of staff so that proper support of the pupil (which might involve not allowing him or her to take part due to concerns about welfare) can be guaranteed.

#### **Photography and privacy, including mobile phones**

Parents, carers or relatives may only take photos or video recordings of pupils in school or on school-organised activities with the prior consent of the Headmaster and in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed, filmed or for photos to be used in school publications and promotional material, and have completed the permission slip to assert this, then their rights will be respected.

If staff take digital images of children in school activities, they are required to download the images within 24 hours of taking them, or within 24 hours of return from the trip on which they were taken. Downloading should be done on the appropriate school pictures folder, managed at school. Images may be kept on a device that is owned by the School rather than the individual member of staff.

The recording of photographic and video evidence is used to demonstrate pupil achievement and progress appropriate to the School's curriculum and may be presented in pupils' books or development records. In all cases of recording such information, school cameras are used. These are only taken off site to record evidence of out-of-school learning, for example on a school trip. Stored footage or photographs taken remain electronically in school. Staff are not permitted to use their own mobile devices of any kind to record such evidence.

#### **Email, electronic communication and computers**

Staff will only use the School's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. Staff will only use the approved

School email, or other School-approved communication-systems with pupils or parents/carers, and only communicate with them on appropriate School business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers.

All computer equipment and internet access within the School will be subject to appropriate "parental controls" and internet safety rules in line with our E-safety Policy. Pupils, staff and parents will sign the Acceptable Use Policy, and regular mention of appropriate use of IT is made at staff training sessions.

### **Records and record keeping**

The DSL will keep (in a secure place) written notes of all safeguarding incidents and child protection or child-in-need concerns relating to individual pupils at the School. This information may be shared with other agencies as appropriate. Child protection records are not open to pupils or parents or staff. CP records are kept securely by the DSL and separately from educational records. They may only be accessed by the DSL, the DDSLs and the Headmaster in order to monitor a pupil's welfare. Referrals made to Children's Services under the London Procedures will be recorded on a Common Assessment Framework form, with copies sent securely to Children's Social Care.

The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate records of those with Parental Responsibility and emergency contacts. If a pupil is withdrawn from the school having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the school to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school.

We will inform the Local Authority when we are about to add or delete a pupil's name from the school admission register for any reason in line with Southwark's *Children Missing Education (CME) Protocol*.

Child Protection records will be sent to receiving schools or institutions separately and under a confidential cover when pupils leave the School and a receipt will be obtained.

All contemporary records and all records of past pupils in our possession are stored safely and securely.

### **The Policy and Monitoring, Review and Complaints and the role of the Board of Governors**

The Board of Governors takes its responsibilities regarding children's welfare seriously. The Board of Governors will ensure that they comply with their duties under legislation and that the policies, procedures and training in the School are effective and comply with the law at all times.

The Governing Body will ensure that the School contributes to inter-agency working in line with statutory guidance, Working together to Safeguard Children (March 2015) [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_together\\_to\\_safeguard\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_together_to_safeguard_children.pdf) and Keeping Children Safe in Education [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550511/Keeping\\_children\\_safe\\_in\\_education.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf), and that the School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the SSCB, <http://safeguarding.southwark.gov.uk/>

The Board of Governors has nominated **Dr E Frances Bowen** as **the Link Governor for Safeguarding** to liaise with the local authority and/or partner agencies on issues of child protection.

Concerns about and allegations of abuse made against the Headmaster will be referred to the Chairman of Governors who will liaise with the LADO and partner agencies and will attend any strategy meetings called in respect of such an allegation against the Headmaster.

A school safeguarding review, covering both the policy and cases managed at school, is undertaken annually under the authority of the Link Governor for safeguarding. The Headmaster provides an annual report to the Board of Governors outlining details of any safeguarding issues that have arisen during the year and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name. This report will also audit any trends or relevant data from the year's relevant safeguarding experience.

The Link Governor for Safeguarding meets on a termly basis (at least often multiple times each term) with the DSL and other relevant staff to monitor both the volume and progress of cases where a concern has been raised to ensure that the School is meeting its duties in respect of safeguarding, and the implementation of the Safeguarding Policy and its procedures including safe recruitment and the maintenance of the Single Central Record. This is in addition to and does not replace the responsibility that rests with the Headmaster to monitor the work of the DSL.

The Governors have regular in-house training and the Chair and Link Governor receive discrete training from approved bodies.

The Headmaster and the DSL meet weekly to review the Safeguarding Register. The DSL meets fortnightly with the extended safeguarding team (Section Heads, School Counsellor, School Chaplain, Nurses). In addition the DSL meets the Heads of Section on alternative weeks when any pastoral concerns can be addressed. The DSL is also available by phone and email at any time to discuss concerns relating to safeguarding.

In line with KCSIE (Sep '16) staff are encouraged to pass on comments about policy and practice in safeguarding, in order to encourage the sense that everyone is responsible for safeguarding at Alleyn's.

The Safeguarding Policy is reviewed annually by pupils in the Senior School (via the School Council) and by parents (via the Alleyn's Parents' Association). Staff and pupil feedback about safeguarding issues will be incorporated where applicable into this policy.

All complaints arising from the operation of this policy will be considered under the School's complaints procedure, with reference to external agencies if necessary.

**The Board of Governors has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated governor or the Headmaster.**

..... Date .....

Iain Barbour, Chairman of Governors

..... Date .....

Frances Bowen, Deputy Chair of Governors and the Link Governor for Safeguarding

..... Date .....

Gary Savage, Headmaster

..... Date .....

Andy Skinnard, Designated Safeguarding Lead

## Appendices

**Appendix A: Below is an abridged version of the important new Annex A, provided in KCSIE (Sep '16) which gives more further information about relevant safeguarding issues.**

### **Annex A: Further information**

#### **Further information on a child missing from education**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

#### **Schools**

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

**All schools must inform their local authority of any pupil who is going to be removed from the admission register where the pupil:**

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

The local authority must be notified when a school is to remove a pupil from its register for any of the five grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

**All schools must 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.**

### **Further information on child sexual exploitation**

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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.

### **Further information on so- called 'honour based' violence**

So-called 'honour-based' violence (HBV) 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. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### **Indicators**

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/512906/Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf)

and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

### **Actions**

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

**FGM mandatory reporting duty**

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

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

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/469448/FGM-Mandatory-Reporting-procedural-info-FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/469448/FGM-Mandatory-Reporting-procedural-info-FINAL.pdf)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>74</sup> Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

**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. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published a document, Multi-agency guidelines, with pp. 32-36 focusing on the role of schools and colleges.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MU\\_LTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MU_LTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk).

**Further information on preventing radicalisation**

Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

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

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

### **Prevent**

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes:

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. The Government has launched 'educate against hate', a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

### **Channel**

School and college staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at:

<https://www.gov.uk/government/publications/channel-guidance> E-learning channel awareness programme for staff is available at:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html) [This an e-learning module that all academic staff at Alleyn's completed in 2015-6.]

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

### **Appendix B – the types of abuse which staff are required to be aware of through training:**

#### **1) Types of Abuse: Physical abuse; Emotional abuse; Sexual abuse; Neglect**

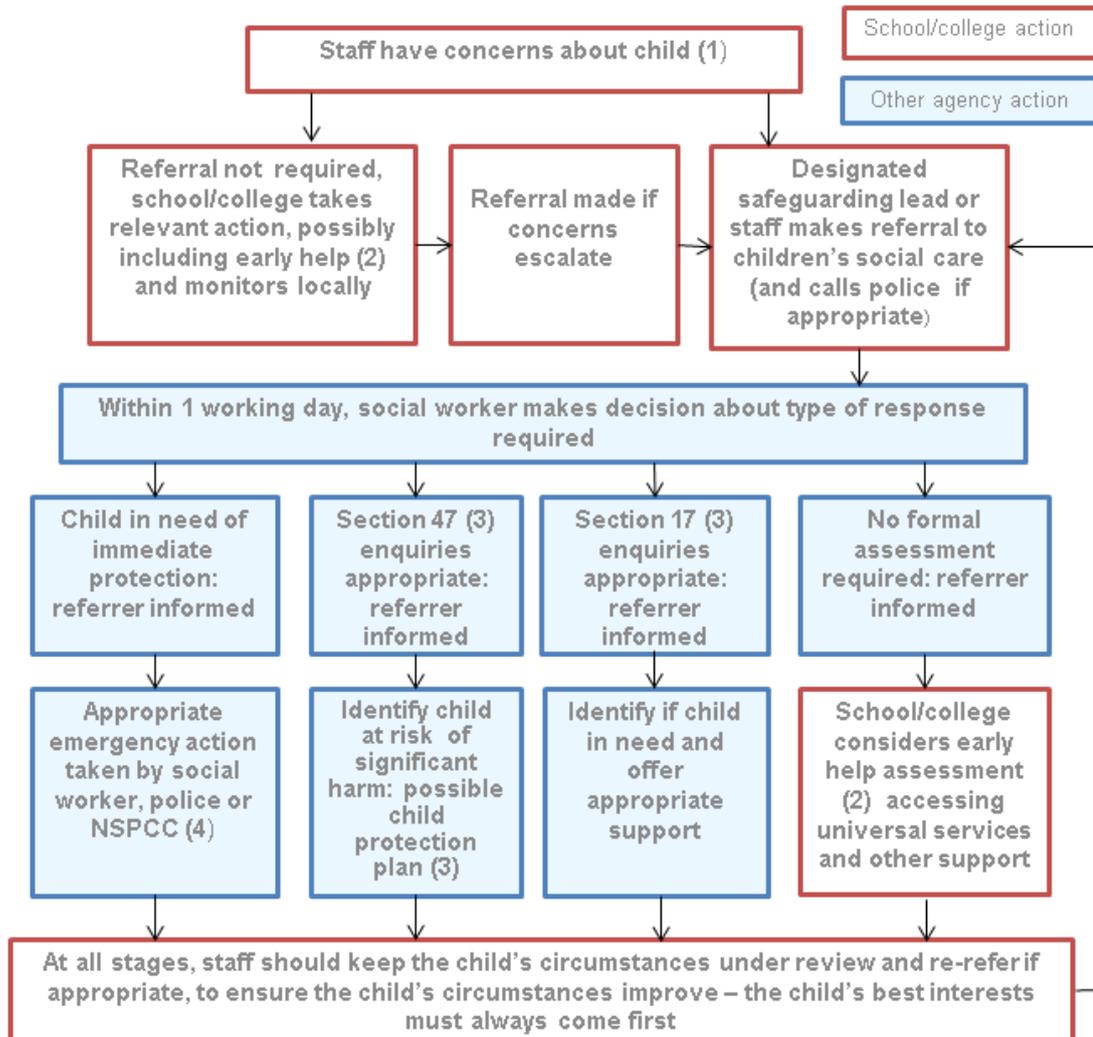
#### **2) Specific safeguarding issues, of which staff should be aware:**

- Child missing from education (10 day requirement + noticing regular patterns)
- Child missing from home or care
- CSE
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- FGM

- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Mental health
- Private fostering
- Preventing radicalisation (channel panels and separate police hotline)
- Sexting
- Teenage relationship abuse
- Trafficking

Appendix C – what staff should do where there are concerns about a child (from KCSIE (Sep '16))

**Actions where there are concerns about a child**



**Appendix D – issues relating to Prevent****Example indicators in concern about students vulnerable to radicalisation and extremism:**

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (*e.g.* the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (*e.g.* IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

**Appendix E – relating to CSE****Example (not exhaustive) indicators of children being sexually exploited are:**

CSE: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017):

- 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/suspicious 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.

**Appendix F – relating to the issue of forced marriage****Example (not exhaustive) indicators of pupils vulnerable to forced marriage include:**

- the impairment of social, educational and career development, including financial dependence and lifestyle restrictions;
- pupils suffering emotionally and showing signs self-harm, including self-cutting or anorexia;
- pupils suffering anxiety, becoming withdrawn and suffering from low self-esteem;
- pupils possible declining dramatically in academic or co-curricular performance, in aspiration, self-motivation or showing different markers in things like punctuality or appearance;
- pupils possibly coming to the attention of authorities outside school being discovered shop-lifting or taking drugs and alcohol;
- pupils presenting with an unexpected amount of missed school or becoming anxious close to extended periods of school holiday when school closes;
- parents intervening inappropriately about decisions on subject choice or university/after-school destination;
- family patterns with elder siblings (of both genders) of attendance or behaviour;
- possible inappropriate need by the pupil for assurance from specific teachers or other adult members of staff

**Appendix G – relating to FGM**

From the “Multi-agency statutory guidance on female genital mutilation” (2016), the following risk factors are listed (pp38-9):

There are a number of factors in addition to a girl's or woman's community, country of origin and family history that could indicate she is at risk of being subjected to FGM. Potential risk factors may include:

- a female child is born to a woman who has undergone FGM;
- a female child has an older sibling or cousin who has undergone FGM;
- a female child's father comes from a community known to practise FGM;
- the family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children;
- a woman/family believe FGM is integral to cultural or religious identity;
- a girl/family has limited level of integration within UK community;
- parents have limited access to information about FGM and do not know about the harmful effects of FGM or UK law;
- a girl confides to a professional that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- a girl talks about a long holiday to her country of origin or another country where the practice is prevalent (see Section 2.3 for the nationalities that traditionally practise FGM);
- parents state that they or a relative will take the girl out of the country for a prolonged period;
- a parent or family member expresses concern that FGM may be carried out on the girl;
- a family is not engaging with professionals (health, education or other);
- a family is already known to social care in relation to other safeguarding issues;
- a girl requests help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- a girl talks about FGM in conversation, for example, a girl may tell other children about it (see Annex G for commonly used terms in different languages) – it is important to take into account the context of the discussion;
- a girl from a practising community is withdrawn from Personal, Social, Health and Economic (PSHE) education or its equivalent;
- a girl is unexpectedly absent from school;
- sections are missing from a girl's Red book; and/or
- a girl has attended a travel clinic or equivalent for vaccinations / anti-malarials.

**Remember:** this is not an exhaustive list of risk factors. There may be additional risk factors specific to particular communities. For example, in certain communities FGM is closely associated to when a girl reaches a particular age.

If any of these risk factors are identified professionals will need to consider what action to take. If unsure whether the level of risk requires referral at this point, professionals should discuss with their named/designated safeguarding lead.

**Example (not exhaustive) indicators that FGM might have already taken place:**

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Policy Reviewed September 2017 (date of next review September 2018)

- a girl or woman has difficulty walking, sitting or standing and may appear to be uncomfortable
- a girl or woman spends longer than normal in the bathroom or toilet due to difficulties urinating
- a girl spends long periods of time away from a classroom during the day with bladder or menstrual problems
- a girl or woman has frequent urinary, menstrual or stomach problems
- there may be prolonged or repeated absences from school or college
- increased emotional and psychological needs for example withdrawal or depression, or significant change in behaviour
- a girl or woman is reluctant to undergo any medical examinations
- a girl or woman asks for help, but may not be explicit about the problem
- a girl talks about pain or discomfort between her legs.

**Appendix H – relevant publications**

The Children and Families Act (2014); The Munro Review of Child Protection (2011); Child Care Act (2006); Disqualification Under the Child Care Act (2006); Education and Inspections Act (2006); Every Child Matters (2003); the Education Act, Section 175 (2002); the Education Act (1996); the Children Acts (1989) and (2004); the Singleton Report (2009) and all guidance issued by the Secretary of State.

We also have regard to the following government published guidance:

- *What to do if you're worried a child is being abused* (2015) and Information Sharing – Advice for practitioners.
- *Sexting in schools and colleges: Responding to incidents and safeguarding young people* (2016)
- *Preventing and tackling bullying: Advice for headteachers, staff and governing bodies* (July 2017)
- *Cyberbullying: Advice for headteachers and school staff* (Nov 2014)
- *Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (Feb 2017)