



Education is that which liberates

7a Safeguarding Policy

The Swaminarayan School

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EYFS Designated Safeguarding Lead: Mrig Divecha (Head of EYFS)

Senior School Deputy Safeguarding Leads: Sylvie Alexander (PSHCE Coordinator) and Nilesh Manani (Head of Senior School)

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1. Policy statement

- 1.1** All the School's Governors and Trustees are responsible for ensuring that mechanisms are in place to assist staff to understand and discharge their safeguarding responsibilities. This policy has been authorised by the Governors and Trustees, is addressed to all Governors, members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit. All adults in the school community are responsible for safeguarding and promoting the welfare of children.
- 1.2** Safeguarding and promoting the welfare of children is defined in the DfE's Keeping Children Safe in Education (KCSIE) (September 2018) 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 in the best interests of the child to ensure the best outcomes.
- 1.3** Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse and neglect (for further information see [5.1](#) and [Appendix 3](#)). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs.
- 1.4** There is an important distinction between safeguarding children who have suffered or are likely to suffer significant harm (where cases should be reported to children's social care immediately) and action required to promote the welfare of children in need of additional support even if they are not suffering harm or are at immediate risk.

2. Principles

- 2.1** The Swaminarayan School (the School) is committed to safeguarding and promoting the welfare of children and young people and expects all staff, Governors and volunteers to share this commitment. We recognise that children have a fundamental right to be protected from harm and that pupils cannot learn effectively unless they feel secure. We therefore aim to provide a school environment which promotes self-confidence, a feeling of self-worth and the knowledge that pupils' concerns will be listened to and acted upon. The School will take all reasonable measures to:
- Ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in Keeping Children Safe in Education (September 2018) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the School's Recruitment and selection policy (18a Safer Recruitment Policy). This includes identity check, right to work, enhanced DBS criminal record and barring list (and overseas where needed), references and prohibition from teaching or managing schools (s.128).
 - Ensure that we carry out all necessary checks on the suitability of people who serve on the School's governing body in accordance with the above regulations and guidance given in Keeping Children Safe in Education (September 2018).
 - Ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible after the person has ceased to provide services to the School and in any event within one 4 month of the person leaving the school. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral

threshold, consideration will be given to making a referral to the TRA. Reasons for making such a referral would include: unacceptable professional conduct; conduct that may bring the profession into disrepute; or a conviction, at any time, for a relevant offence. As a registered EYFS setting, any allegations against staff or any of abuse alleged to have taken place on the premises, Ofsted will be informed as soon as practicable (14 days at the most).

- Ensure that where staff from another organisation are working with our pupils on another site, we have received confirmation that appropriate child protection checks, and procedures apply to those staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children in relation to the Risk Assessment. (14d Educational Visits and Activities Policy)
- Ensure that its safeguarding arrangements follow the procedures and practice of the Local (Brent) Safeguarding Children Board (LSCB) (or other LSCB as may be appropriate) as part of the inter-agency safeguarding procedures set up by it. Brent's procedures are published on their website ([Link](#))
- Ensure that early help support is provided as soon as a problem emerges.
- Protect each pupil from any form of abuse, whether from an adult or another pupil or child.
- Be alert to signs of abuse both in the School and from outside ([Appendix 3](#)).
- Deal appropriately and promptly with every suspicion or complaint of abuse and to consider, at all times, what is in the best interests of the child.
- Design and operate procedures which promote this policy.
- Design and operate procedures which, so far as possible, ensure that teachers and others within the School community who are innocent are not prejudiced by false allegations.
- Support pupils who have been abused in accordance with their agreed child protection plan where these are in place.
- Be alert to the medical needs of children with medical conditions.
- Operate robust and sensible health and safety procedures (11 Health and Safety Policy A9).
- Take all practicable steps to ensure that School premises are as secure as circumstances permit.
- Have regard to statutory guidance issued by the Secretary of State for Education (DfE) in accordance with section 175 of the Education Act 2002 and associated regulations.
- Review and consider how pupils should be taught about safeguarding.
- Identify children who may be vulnerable to radicalisation, and know what to do when they are identified in order to fulfil the Prevent duty.
- Ensure that all governors and staff are aware of their responsibilities with regards to safeguarding through appropriate training which is regularly renewed, and other annual updates.
- We aim to work closely with the Local Safeguarding Children's Board (LSCB), Brent, or any other relevant LSCBs that we work with.

3. Child protection procedures – summary

3.1 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and a referral should be made to Brent's Front Door. The Front door team will make the decision of the legal threshold for referral to social services. Both the school and public can find details of when a referral crosses a threshold from Brent LSCB website ([link](#)), which has the threshold document. If the student is from another local authority then it will be in line with that LSCB's published thresholds and will be referred to an external agency such as the children's social care department in the relevant local authority or the child protection unit of the police, without investigation within the School. In these cases, the following referral procedures apply:

3.2 **If the allegation is against a member of staff**, the Designated Person or a professional person connected to the School, the allegation should be reported to the Headteachers immediately. The matter will be

referred by the Headteacher to the Local Authority Designated Officer (LADO) within one working day. Any doubts or concerns may be discussed informally with the LADO, initially on a “no names” basis.

3.3 If the allegation is against a Headteacher, the person receiving the allegation should immediately inform the Chair of Governors (Piyush Amin) without first notifying the Headteacher. The Chair of Governors will liaise with the LADO and relevant agencies as required. If an allegation is made against the Chair of Governors or another Governor, the allegation should be reported to a Headteacher. In either case, any such allegations will be discussed with the LADO within one working day before further action is taken.

3.4 If the allegation does not involve a member of staff or a professional person and the child has suffered harm or is at risk of harm, the matter will be referred by the Designated Person to children’s social care department where the child lives. Advice and informal consultation over apparently borderline cases may be discussed with the Brent Family Services Front Door team in the first instance and initially on a “no names” basis.

4. Management of Child Protection matters

4.1 The Board of Governors (“the Board”) takes seriously its responsibility and its duty in promoting an environment in which children can feel secure and safe from harm. The nominated Governor for safeguarding is Dipak Patel. He instigates a review of the school’s safeguarding procedures on behalf of the Board and reports to the Board annually, making any recommendations for improvements. The Governors also meet with the Trustees annually and are updated on issues and the policy is reviewed. The nominated Governor also discusses safeguarding matters with the Designated Person at least termly and reports to the Board at each meeting. They must also ensure that there is a Single Central Record for appointment.

4.2 The Headteachers are responsible for ensuring that the procedures outlined in this policy are followed on a day to day basis.

4.3 The School has appointed a senior member of staff with the necessary status and authority (Designated Person) to be responsible for matters relating to child protection and welfare. Parents are welcome to approach the Designated Person if they have any concerns about the welfare of any child in the school, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher or the Headteacher who will notify the Designated Person in accordance with these procedures.

4.4 The main responsibilities of the Designated Person are:

The responsibilities of the Designated Safeguarding Lead are found in Annex B of Keeping Children Safe in Education and include:

4.4.1 Manage Referrals:

- Management and referral of cases of suspected abuse to Brent Family Front Door, local borough children’s services; and/or the police where a crime may have been committed.
- Have a working knowledge of how Brent Family Front Door operates, the conduct of a Safeguarding case conference, and can attend and contribute to these effectively when required to do so;

4.4.2 Work with others:

- Liaison with the Board of Governors and Local Authority on any deficiencies brought to attention of the Board of Governors and how these should be rectified without delay;
- Act as a source of support, advice and expertise within the school;
- Attend and contribute to Safeguarding conferences when required to do so;
- liaise with Heads to inform them of any issues and ongoing investigations and ensure there is always cover for this role;

4.4.3 Training

- Whole school LSCB safeguarding training will be delivered by the LSCB every three years.
- Obtain access to resources and attend any relevant or refresher training courses every two years. Keep up to date with new developments in safeguarding by accessing briefings and journals.
- [Appendix 9](#) contains a link to the Department for Children, Schools and Families document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings' which is used to give clear guidance to staff about their behaviour and actions so as not to place either pupils or themselves at risk of harm or allegations of harm to a pupil.
- Ensure all staff have induction training. Training will include:
 - o The School's safeguarding policy;
 - o Behaviour policy;
 - o Knowledge of the DSLs;
 - o To recognise and report any concerns immediately they arise;
 - o Be given Keeping Children Safe in Education Part 1;
 - o Be given Keeping Children Safe in Education Annex A;
 - o Staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships and communications including use of social media).
- Raise Awareness
- Recognise how to identify signs of abuse and when it is appropriate to make a referral; ([Appendix 4](#))
- Ensure each member of staff has access to and understands the school's safeguarding policy especially new or part-time staff who may work with different educational establishments; The full policy is available on the school web site and a summary of how to manage a disclosure is printed in and available in the appendix of the policy and on the Staffroom noticeboards. All new staff receive and must read the safeguarding policy and KCSIE (2018) part 1 and Annex A when they join. All existing staff have been issued with these documents and have read them.
- Whistle-blowing procedures in conjunction with staff code of conduct
- Significant changes to policy, practice and any new legislation will be brought to the attention of staff through refresher training sessions during INSET and via LSCB briefings and emails as well as Phase Meetings.
- Ensure the School's Safeguarding policy is updated and reviewed annually and displayed on the school website.

4.4.4 Child Protection File

- To keep detailed, accurate and secure written records of referrals/concerns. These records are stored in a locked filing cabinet in Reception.
- Maintain and monitor Safeguarding records, including monitoring and acting upon individual and patterns of concerns or complaints (e.g. children who repeatedly go missing), in accordance with section on "Records, Monitoring and Transfer" overleaf.
- When children leave the School, ensure their Safeguarding file is handed to the Designated Safeguarding Lead and signed for in the new school/college as soon as possible.

4.5 If the Designated Person is unavailable the duties will be carried out by one of the Deputy Designated members of staff who have received appropriate training. The Deputy Designated staff are James Hopkins (Deputy Headteacher Senior School, Deputy for the whole school), Mrig Divecha (EYFS Leader, EYFS Designated Safeguarding Lead), Anthony Chavez (Assistant Head - Pastoral, Prep School), Mr Raja (Headteacher for Prep), Sylvie Alexander (PSHCE, Coordinator Senior School) and Mr Manani (Headteacher for Senior School). All contact details can be found below under the heading [18. Key Contacts](#).

4.6 The Designated Person and Deputy Designated staff have undertaken Level 3 child protection training and will attend refresher training at two-yearly intervals. The Designated Person has the appropriate

authority and has been given the necessary time, funding, training, resources and support to carry out this role.

5. Types of abuse

5.1.1 The definition of 'child abuse' is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. There are four types of child abuse which are commonly identified as:

5.1.2 Physical abuse:

is 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.

5.1.3 Emotional abuse:

is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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 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.

5.1.4 Sexual abuse:

involves forcing or enticing a 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.

5.1.5 Neglect:

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

5.2 Children with special educational needs (SEN) and disabilities:

Can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. Students with SEND are at a higher risk group to both child protection issues and bullying. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.

- Communication barriers and difficulties in overcoming these barriers. Further guidance is given at [Appendix 3](#).
- Students with SEND are monitored closely through their social engagements with their class or form teachers to see if there is a change in mood or behaviour.

6. Signs of abuse

6.1 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring).

- The pupil says she has been abused or asks a question which gives rise to that inference.
- There is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn.
- The pupil does not want to change clothes in front of others or participate in physical activities.
- The pupil is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- The pupil talks about being left home alone, with carers that appear to be inappropriate or with strangers.
- The pupil is regularly missing from school or education.
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- The pupil's development is delayed in terms of emotional progress.
- The pupil suddenly loses or gains weight.
- The pupil drinks alcohol regularly from an early age.
- The pupil is concerned for younger siblings without explaining why.
- The pupil talks about running away.
- The pupil shies away from being touched or flinches at sudden movements.
- The pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes.
- The pupil appears neglected, e.g. dirty, hungry, inadequately clothed
- The pupil is reluctant to go home, or has been openly rejected by her parents or carers.

6.2 Signs of grooming The signs of grooming aren't always obvious. Groomers will also go to great lengths not to be identified. Children may:

- Be very secretive, including about what they are doing online.
- Have older boyfriends or girlfriends.
- Go to unusual places to meet friends.
- Have new belongings such as clothes or mobile phones that they can't or won't explain.
- Have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

Further guidance is given at [Appendix 3](#). Staff will also find it useful to refer to the DfE's guidance What to do if you're worried a child is being abused (March 2015) ([Link](#)).

7. Preventing Radicalisation

7.1 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as 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.

- 7.2** Signs of radicalisation: 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. Background factors may contribute to vulnerability which are often combined with background influences such as family, friends or online, and with particular 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 managing 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 professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the Channel programme and possibly to children's social care where the child lives through the Designated Person with whom they should discuss their concerns. 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.

- 7.3** Risk assessment: The school has assessed the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology ([Appendix 6](#)).
- 7.4** Working in partnership: The Designated Person will continue existing partnership arrangements and keep open lines of communication with the Local Safeguarding Children's Board.
- 7.5** Staff training: The Designated Person has undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Staff have also been given Chanel training.
- 7.6** IT: Suitable filtering is reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in school.
- 7.7** Procedures: If a member of staff is concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e. they should discuss it with the Designated Person who will follow the safeguarding procedures outlined in this policy and may also make a referral to the Channel programme. Borderline cases will be discussed with the Channel Panel on a no-names basis.
- 7.8** **Prevent Duty Guidance (2016)** for further information ([Link](#))

8. Female Genital Mutilation (FGM):

- 8.1** If a teacher discovers that an act of FGM appears to have been carried out on a girl aged under 18, they have a statutory duty to report it to the police. Unless there is good reason not to, the teacher should follow the usual safeguarding procedures set out in this policy and report the matter to the Designated Person who will follow the procedures set out in this policy and involve children's social care where appropriate. Any other member of staff who has a suspicion of FGM should report it to the Designated Person. There is a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available see KCSIE Annex A p.55 (2018) ([Link](#)).

9. Forced Marriage

- 9.1** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered 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). For further reading please see KCSIE Annex A p.55 (2018) ([Link](#)).

10. Private Fostering

10.1 The school must refer any case about private fostering to the Local Authority to help ensure the safety of the child.

10.2 Private fostering is:

*A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)*

11. Responsibility of all staff, governors and volunteers

11.1 Every employee and Governor of the School as well as every volunteer who assists the School is under a general legal duty:

- To protect children from abuse.
- To be able to identify welfare concerns amongst the pupils and to be able to identify pupils who are in need of additional support.
- To be aware of the School's child protection procedures and to follow them.
- To know how to access and implement the procedures, independently if necessary.
- To keep a sufficient record of any significant complaint, conversation or event.
- To report any matters of concern to the Designated Person.

11.2 Training:

All staff will undertake appropriate training including refresher training in accordance with advice provided by the Local Safeguarding Children Board (LSCB) for Brent. In addition, all staff members will receive safeguarding and child protection updates (via email, e-bulletins, staff meetings) as required, but at least annually. All new staff, including temporary staff and volunteers are provided with induction training that includes this policy (which contains how to contact the Designated Person), the Staff Code of Conduct, the Whistleblowing policy, the identity of the Designated Person and a copy of Part 1 and Annex A of the DfE's KCSIE (September 2018). All staff are required to read Part 1 and Annex A of this guidance each time it is updated.

11.3 Whistleblowing:

All staff are required to report to the Headteachers (or if they are not available and the matter is urgent, a member of the Senior Management Team (SMT)) any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. If the member of staff feels unable to raise their concern with a Headteacher (or a member of SMT), they should contact the Chair of Governors. Where a member of staff feels unable to raise an issue with a Headteacher or the Chair of Governors or feels that their genuine concerns are not being addressed, they may contact the NSPCC whistleblowing advice line. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Malicious allegations may be considered as a disciplinary offence. Further detail on whistleblowing procedures is outlined in the School's Whistleblowing policy (7b Whistleblowing Policy).

12. Procedures for receiving a complaint of abuse

12.1 Initial complaint: A member of staff, Governor or volunteer suspecting or hearing a complaint or suspicion of abuse must;

- Stay calm and sympathetic. Listen carefully to the child and keep an open mind. Staff, Governors or volunteers should not take a decision as to whether or not the abuse has taken place.
 - Not ask leading questions, that is, a question which suggests its own answer. Ask open questions that will encourage a secure and sympathetic environment for the child, such as "is there anything else you want to tell me?"
 - Reassure the child but not give a guarantee of absolute confidentiality. The member of staff, Governor or volunteer should explain that they need to pass the information to a member of staff who will ensure that the correct action is taken. Staff, Governors or volunteers should not make promises that they can't keep such as 'everything will be alright' but clearly explain what they have to do next and who they will talk to.
 - Keep a sufficient and accurate written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Person as soon as possible.
 - Not take any further action unless specifically requested by the Designated Person or one of the Deputy Designated Staff (including the Headteachers).
 - Only share information on a need-to-know basis and must not discuss the matter.
- 12.2** Preserving evidence: All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.
- 12.3** Reporting: All suspicion or complaints of abuse must be reported to the Designated Person or Deputy Designated Persons, or if the complaint involves a member of staff, to a Headteacher. Details of procedures for reporting allegations against members of staff are given at [Section 10](#). and [Appendix 2](#).
- 12.4** If in exceptional circumstances you are not able to speak to the Designated Person, the Deputy Designated staff (including the Headteachers), and there is risk of immediate serious harm to a child and you are not able to follow this referral procedure, contact the Brent Front Door team or the social services department where the child lives (see [Section 18](#) for contact details). If there is an immediate emergency, dial 999 and report the matter to the police.
- 12.5** Members of staff must, as soon as possible after making a report, complete the Reporting Form which can be found at [Appendix 1](#).
- 12.6** Action by the Designated Person on receiving a notification of concern. The Designated person will, when taking action:
- Clarify the issues with the person raising the concern.
 - Refer the matter to the appropriate Headteacher to agree on the next steps, depending on the seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to social services and the police immediately. When the Headteacher is not available the discussion will be with another Deputy Safeguarding Lead or member of Senior Leadership Team.
 - Consider the wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
 - Consider the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Person is concerned that disclosing information to parents would put a child at risk, they may take further advice from the relevant professionals before informing parents. A disclosure to children's services may be made without prior contact with a child's parents.

- Depending on the nature of the disclosure, advice will be sought from social services as to when to notify the complainant's parents.
- Consider duties of confidentiality, so far as applicable.

12.7 Types of referral There are different types of referral procedures according to the nature of the disclosure made.

- Where a child has suffered or is at risk of harm and the matter does not involve a member of staff, a referral will be made to children's social care where the child lives within 24 hours ([Appendix 5](#) and [18. Key Contacts](#)). Where there are concerns about a member of staff's suitability to work with children, a referral will be made to the LADO. When deciding whether to make a referral, the Headteacher and Designated Person will not draw their own conclusions over what appear to be borderline cases and if there is room for doubt as to whether a referral should be made, and depending on the nature of the case, the Designated Person will consult with either the LADO or the Brent Front Door team, without identifying the family.
- If the child is considered to be a concern and is not at risk of suffering immediate significant harm but requires additional support, the Designated Person will refer the child to children's social services department where the child lives. Where a child and family would benefit from coordinated support from more than one agency (for example education, health, housing, police) there should be an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The school will coordinate with the local inter-agencies involved.
- As soon as concern exists that a child may be at risk of significant harm, a referral will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to social services within 24 hours. If no response or acknowledgment is received within three working days, the Designated Person will contact social services again.
- Where a disclosure relates to the mental health of a student and they are at risk from themselves rather than a third party, the Designated Person will consult other Senior members of staff, and decide on the course of action, which will include meeting with the parents/guardians and a referral to Children and Adolescents Mental Health Services (CAMHS). In such cases, parental consent is sought before referrals may be made to (CAMHS) or private health care professionals.
- Where a child is deemed to be at risk of radicalisation, the above procedures will be followed and a referral may also be made to the Channel programme.

13. Allegations against staff

13.1 The School has procedures for dealing with allegations against staff (and Governors or volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff, Governors and volunteers from false or unfounded allegations. These procedures (which are set out fully in [Appendix 2](#)) follow part four of KCSIE (September 2018) and will be used where the member of staff, Governor or volunteer has:

13.1.1 Behaved in a way that has harmed a child, or may have harmed a child;

13.1.2 Possibly committed a criminal offence against or related to a child.

13.1.3 Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

13.2 Staff guidance: Guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. Staff should be particularly careful in situations where they are alone with pupils providing one-to-one tuition. This guidance is conveyed at safeguarding training for staff and a Staff Code of Conduct (7e Code of Conduct for Staff Policy), staff are kept informed of updates.

13.3 Any concern about a member of staff should be raised with a Headteacher immediately regardless of how unlikely it seems that there would be any substance to the concern. No further action may be necessary but it is important that the information is brought to the attention of the Headteacher in the first instance.

14. Allegations against pupils (peer on peer abuse)

14.1 All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but is not limited to, bullying (including cyberbullying), gender based violence/sexual assault and sexting.

14.2 Staff should always be clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Staff should take any allegations of this as serious and that any form of abuse is unacceptable. Procedures for dealing with peer-on-peer abuse are the same as for other types of abuse and staff who become aware of peer-on-peer abuse should immediately refer the matter to the relevant DSL who will decide the best course of action. Depending on the nature and the severity of the abuse, staff may refer the matter directly to the police and/or Local Children’s Services. In that case they should then discuss the matter with the DSL.

14.3 It is recognised that there is a gendered nature of peer on peer abuse (that it is more likely for boys to be perpetrators and girls the victims), but that all peer on peer abuse is unacceptable and taken seriously.

14.4 All staff should be clear as to the school’s; Safeguarding policy, Behaviour Policy (A4 Behaviour, Rewards and Sanctions Policy) and Bullying Policy (10a Bullying Policy), and procedures with regards to peer on peer abuse. Where an allegation of abuse against one or more pupils has been made or where a member of staff, Governor or volunteer is concerned about peer on peer abuse, the child protection procedures set out in this policy should be followed and the Designated Person informed. The pupil(s) accused of abuse and the victim of abuse will both be treated as at risk and a referral will be made to children's social care in respect of either child if that child is suffering or is at risk of harm.

14.5 A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour will apply. The School will take advice from the Brent Front door service on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

14.6 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Brent Local Authority, parents or guardians are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

14.7 Support for those involved in peer on peer abuse (both parties) will be offered, where possible, support through the school. This will be with regular monitoring by the Designated Person. If children’s social care has been involved, then support may be provided through the Early Help or wider safeguarding team.

14.8 The school seeks to minimise the chance of peer on peer abuse through a number of methods:

- It has dedicated pastoral teams. This means that there are a range of adults to talk to.
- Pupils will sign an Acceptable Use Policy (AUP), as well as not having mobile phones on them during school hours. The aim is to help minimise cyber-bullying
- The school uses Netscape monitoring systems and Smoothwall filtering systems.
- Prep classrooms have confidentiality boxes to discuss issues that arise.
- 10a Bullying Policy. Sets out how to deal with issues linked to bullying.
- The school uses PSHCE and ICT lessons to help inform children about issues, such as bullying and cyberbullying.

14.9 Types of Abuse: Peer on Peer abuse can take many forms these include Bullying, Sexual Violence, Sexting, Physical Abuse, Sexual Harassment and 'Initiation Ceremonies', financial abuse, coercive control. More information on these can be found in the KCSIE 2018 Part 5.

15. Informing Parents

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

16. Confidentiality and information sharing

16.1 When considering what information to share, the protection of the child must always be the most important consideration.

16.2 Pupil child protection records: The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 and in accordance with the requirements of Working Together to safeguard children (August 2018). The Designated Person will ensure that if a pupil who is subject to a child protection plan moves to another school, their child protection file will be transferred securely (and sent separately from the main pupil file) to a designated contact at the new school and confirmation of safe receipt obtained.

16.3 Allegations against staff: Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and social services to agree the information that should be disclosed and to whom.

16.4 As a charity we must inform the Charity Commission as soon as is possible if a serious incident has taken place. For guidance on what is classed as a serious incident can be found on the www.gov.uk/ website under Charities. (It can also be seen [here](#))

17. Other safeguarding arrangements

Beyond the child protection procedures outlined in this policy, the School has put in place arrangements to safeguard pupils and to promote their welfare. These include the following:

17.1 Safer recruitment: The School takes seriously its responsibility to recruit staff, Governors and volunteers that are suitable to work with children. The Recruitment and selection policy (18a Safer Recruitment Policy and B34 Procedure for Staff Appointment Policy) sets out the recruitment procedure from start to finish and outlines the checks that are carried out on staff, supply staff and other individuals that may work at the school.

17.2 Safeguarding on educational visits: The School will undertake the necessary safeguarding checks in accordance with guidance given in the DfE's KCSIE (September 2018) as outlined in the Educational Visits Policy (14d Educational Visits and Activities Policy). The School reserves the right to exclude a pupil from a visit on medical/mental health and wellbeing grounds.

17.3 Listening to pupils: The School provides a range of opportunities for pupils to be listened to. In the Senior School there is regular contact time between tutor and tutees at daily registration. Weekly PSHE lessons are usually led by tutors throughout the school. Within the Prep school there are confidentiality boxes for students to raise concerns with their Teachers. Further information can be found in the School's PSHCE policy (2d Personal, Social, Health, Citizenship Education Policy A5). Around the whole school posters (including photographs) are put up for students to identify key members of staff who they can approach about safeguarding issues. The Prep School Assistant Head (Pastoral) also runs a lunchtime room, most days, where students can discuss issues or who have been referred there.

- 17.4 First Aid:** The school currently has 22 members of staff who are first aid trained and 7 who are trained in paediatric first aid. For clearer information on who these staff are and information about how the school deals with medical incidents can be found in the School's First Aid Policy (13a+c First Aid Policy A7-E4). The School is also willing to make referrals to CAMHS, if the student is under the age of 16 then parental permissions will be sought.
- 17.5 Teaching pupils about safeguarding:** Pupils are taught about a range of safeguarding issues (including online safety, substance misuse, child sexual exploitation, grooming, mental health and bullying) through their tutorial sessions, in PSHE lessons and within the Prep school in the ICT lesson. Pupils are taught how to identify risks and how to adjust their behaviours in order to mitigate these risks and build resilience. Resilience to radicalisation is taught through PSHE by promoting fundamental British values and enabling pupils to challenge extremist views.
- 17.6 Filtering and Monitoring:** Suitable filtering and monitoring is in place to protect pupils from online abuse.
- 17.7 Missing pupils:** A child going missing from education is a potential indicator of abuse. The school has procedures in place to deal with pupils that go missing either from school or on a school trip. These procedures are outlined in the Missing Pupil Policy (14b Missing Child Policy E9).
- 17.8 Children missing from education:** Our school recognises the entitlement that all children have to education and will work closely with the local authority to share information about pupils who may be missing out on full time education or who go missing from education. The local authority will also be informed where children are to be removed from the school register a) to be educated outside the school system; b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; or e) because they have been permanently excluded.
- 17.9 Risk assessment:** The School recognises that the evaluation of risks and putting in place steps to mitigate against these risks contributes to promoting the welfare and protection of pupils. For hazardous activities and curricular and extra-curricular activities that may pose specific risks, risk assessments are carried out in accordance with the School's Health and Safety policy (11 Health and Safety Policy A9) and reviewed as required by the School's Health and Safety Committee. Risk assessments for school trips and visits are reviewed by the Head, Deputy Head. Part of this will be a risk assessment on volunteers who accompany students on trips. Any other volunteers within school will need to complete a DBS and be risk assessed.
- 17.10 Visitors:** All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer, unless they have shown a valid DBS and a copy is taken by the office. All visitors are given a badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. Staff are encouraged to stop and question any 'visitors' without a badge on display and should not let them into their classroom if there is no visitor badge.
- 17.11 Visiting speakers:** The school does invite visitors to speak at times but there are arrangements in place to ensure that it aligns with the values and ethos of the school and British values. For more information see [Appendix 7](#) and for the Forms that need to be completed [Appendix 8](#)
- 17.11 School premises:** The School takes all practicable steps to ensure that School premises are as secure as circumstances permit. More information is available in the School's Health and Safety Policy section 7 (11 Health and Safety A9).
- 17.12 Parent and pupils contact:** There will be at least 2 points of contacts for parents. This is to make sure that if there are issues contacting one parent the school will have another person to contact.
- 17.13 Work Experience:** Work places where students attend will need to have their safeguarding procedures checked by the school.
- 17.14 The following policies should be read in conjunction with this Safeguarding (Child Protection) policy:**

- 10a Bullying Policy (A8) (Available on the school website) ([Link](#))
- A4 Behaviour, Rewards and Sanctions Policy (Available on the school website) ([Link](#))
- 14d Educational Visits and Activities Policy
- 11 Health, Safety and Welfare Policy (Available on the school website) ([Link](#))
- B55 School Computer and Acceptable Use Policy
- B27 Special Educational Needs and Disability Policy
- 14b Missing Child Policy (E9)
- 13a+c First Aid Policy A7-E4 (Available on the school website) ([Link](#))
- 18a Safer Recruitment Policy
- 7e Code of Conduct for Staff Policy
- 7b Whistleblowing Policy
- B24 Work Experience Volunteers, Student Teachers, Observers Policy
- Mental Health and Wellbeing

All policies are available on request from the office.

18. Monitoring and review

- 18.1** Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the School (which will include a review of this policy) to determine whether any improvements can be made to prevent a similar event from occurring in the future. Where an incident involves a member of staff, the LADO (where possible) will assist in this review to determine whether any improvements can be made to the School's procedures. This will include a review of the School's co-operation and communication with local agencies.
- 18.2** In addition, the Designated Person will monitor the operation of this policy and its procedures.
- 18.3** The Governors will undertake an annual review of this policy and the School's safeguarding procedures. The Governor conducting the annual review on behalf of the Board, will meet with the Designated Person and other senior staff and take into account any issues raised as a result of any review within the School. The outcome of the review is reported to the Trustees annually. As part of their review, Governors will monitor how efficiently duties have been discharged and will make recommendations for any changes to policy and procedures necessary.
- 18.4** The Governors will ensure that any deficiencies or weaknesses in regard to safeguarding arrangements at any time are remedied without delay.

19 Key Contacts

19.1 School:

The School's phone number is: 020 8965 8381

Role	Name	Telephone Extension	Email
Designated Safeguarding Lead (DSL)	Mr Jamie Pitchford (Senior Leadership and SEN Teacher)	245 Or 207	jamiepochford@tssuk.org
Deputy Designated Safeguarding School (Whole School)	Mr James Hopkins (Senior School Deputy Head)	303	jameshopkins@tssuk.org
Designated EYFS Safeguarding Lead	Ms Mrig Divecha (Head of EYFS)	235	mrigdivecha@tssuk.org
Deputy Designated Safeguarding Lead (Prep School)	Mr Anthony Chavez	216	anthonychavez@tssuk.org

	(Prep School Assistant Head – Pastoral)		
Headteacher Prep School	Mr Umesh Raja	209	admin@tssuk.org
Deputy Designated Safeguarding Lead (Senior School)	Ms Sylvie Alexander (Head of PSHCE)	505	sylviealexander@tssuk.org
Headteacher Senior School	Mr Nilesh Manani	205	admin@tssuk.org
Chair of Governors	Mr Piyush Amin	The Governors can be contact through the School's office: Phone number 020 8965 8381 Email: admin@tssuk.org	
Governor in Charge of Safeguarding	Mr Dipak Patel		

19.2 Brent Safeguarding team:

Role	Name	Telephone	Email
Local Authority Designated Officer (LADO) Contact with the LADO is to be done by the Headteacher, DSL or Deputy Headteacher	Ms Yvonne Prince	Tel: 0208 937 2090 Mobile: 07900 770304	Yvonne.prince@brent.gov.uk
Brent Family Front Door	Initial concerns	0208 937 4300 (Option 1 for Children) Outside of normal office hours (9am – 5pm) please call the emergency duty team on: 0208 863 5250	Website - Link

18.3 Prevent/Counter-Extremism Contacts:

Role	Name	Telephone	Email
Local Authority Coordinator	Kibibi Octave	020 89374225	Kibibi.octave@brent.gov.uk
Prevent Engagement Officer	PC Naomi Conlon	Mobile: 07827 357499	Naomi.conlon@met.police.uk
Prevent DfE Helpline		020 7340 7264	Counter-extremism@education.gsi.gov.uk
Local Police force		Non-emergency: 101 Emergency: 999	
Anti-Terrorist Hotline		0800 789 321	

If the DSL, Deputy DSLs or Headteachers are not available and there is a risk of immediate serious harm to a child anyone can report abuse or discuss concerns in relation to children and young people. The Brent Family Front Door team can be contacted on 0208 937 4300 (or outside of office hours (9am-5pm) 0208 863 5250) or through the website ([Link](#)).

In an immediate emergency dial 999 and report to the police

18.4 Other Local Authorities:

Below are the contact details for children's social care for authorities near the school. If the one needed is not here then it is possible to find them on the London Safeguarding Board ([Link](#))

Local Authority	Telephone
Harrow Children and Family Services	020 8901 2690
Barnet Multi-Agency Safeguarding Hub	020 8359 4066
Camden Safeguarding Children Board	020 7974 6639
Westminster Safeguarding Board	020 8753 3914

18.5 Other Contact Details:

The following telephone numbers or websites may also be useful.

Organisation Name	Telephone	Email/website
Childline	0800 1111	
NSPCC	0808 800 5000	help@nspcc.org.uk
NSPCC Whistleblowing advice line	0800 028 0285	
Ofstead's Whistleblower Hotline	0300 123 3155	
Kidscape (Anti-bullying helpline for parents)	0845 120 5204	
Child Exploitation Online Prevention (CEOP)	0870 000 3344	https://www.ceop.police.uk/CEOP-Reporting/ (for reporting online offences)

Complies with The Education (Independent School Standards) (England) Regulations 2014 and DfE guidance Keeping Children Safe in Education (September 2018) and Working together to safeguard children (August 2018)

Appendix 1 – Record of Concern

Child's Name :			
Child's DOB :			
Male/Female :	Ethnic Origin :	Disability Y/N :	Religion :
Date and time of concern:			
Your account of the concern (what was said, observed, reported and by whom)			
Additional information: (your opinion, context of concern/disclosure)			

Your response (what did you do/say following the concern)

Your name :

Your signature :

Your position in School :

Date and time of this recording :

Action and response of DSL/Headteacher (Include details of siblings)

Name:

Date:.....

Appendix 2 – PROCEDURE FOR ALLEGATIONS AGAINST STAFF (INCLUDING THE HEAD) AND VOLUNTEERS

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

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

Relevant documents:

- DfE 'Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges' September 2018, part 4: Allegations of abuse made against teachers and other staff.

INDIVIDUAL STAFF/DSSL/VOLUNTEERS/OTHER ADULTS WHO RECEIVE THE ALLEGATION

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report immediately to the Headteacher.
- Pass on the written record.
- If the allegation concerns the conduct of the Headteacher, report immediately to the Chair of Governors (or, in the absence of a Chair, the Governor in Charge of Safeguarding), without informing the Headteacher. Pass on the written record. The Chair of Governors or Governor in charge of Safeguarding will deal with any allegations of abuse made against the Headteacher.

When a teacher has been dismissed for misconduct (or would have been had he/she not resigned first) consideration will be given to make a referral to the Teaching Regulation Authority (TRA).

Headteacher or Chair of Board of Governors (only relevant in the case of an allegation against the Headteacher).

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
 - Before taking further action notify and seek advice from the LADO on the same day.
 - You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
 - Report to Brent Family Front Door or local LSCB the child resides in if the LADO advises or if circumstances require a referral concerning a child.
 - If the concern is about the headteacher then they should not be informed.
-
- Ongoing involvement in cases:
 - Liaison with the LADO.
 - Co-operation with the investigating agency's enquiries as appropriate.
 - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.
 - Possible referral to the DBS or TRA in cases of professional misconduct, depending on the outcome.

Staff Allegation Procedure

Pupil makes a disclosure or allegation ensure you have told the pupil the information will be passed on



Record info name/date/time/notes then sign and date



Ensure the immediate safety of the pupil



Inform the Head in the absence of the Head the Chair of Governors OR If the allegation involves the Head then inform the Chair of Governors without notifying the Head



Send all information to the Head if the allegation involves a member of staff or the Chair of Governors If the allegation involves the Head



Consultations will be had between necessary parties No issue will be dealt with by one member of staff. Head will seek advice from the LSCB/designated officer(s) on the best course of action



Relevant bodies will be informed as soon as possible and certainly within 24 hours

Notes: Any member of staff can and should feel able to make a referral in exceptional circumstance. If the issue involves the potential for serious harm the children's social care should be informed from the outset.

Appendix 3 – Further Information on Types of Abuse

TYPES OF ABUSE AND POSSIBLE SIGNS

ABUSE is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing 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 by another child or children.

Pupils with a **Special Educational Need or Disability** may be particularly vulnerable to abuse and neglect.

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fictitious illness by proxy or Munchausen Syndrome by Proxy.

POSSIBLE SIGNS OF PHYSICAL ABUSE

The signs of physical abuse may include:

- Unexplained bruising, marks or injuries on any part of the body;
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh;
- Cigarette burns;
- Human bite marks;
- Broken bones;
- Scalds, with upward splash marks;
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation;
- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, for example in hot weather;
- Depression;
- Withdrawn behaviour;
- Running away from home.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve 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 ill-treatment of a child, though it may occur alone.

POSSIBLE SIGNS OF EMOTIONAL ABUSE

- physical, mental and emotional development lags
- admission of punishment which appears excessive
- over-reaction to mistakes

- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking; hair-twisting; thumb-sucking)
- self-mutilation
- fear of parents being contacted
- extreme of passivity or aggression
- drug/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or 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.

POSSIBLE SIGNS OF SEXUAL ABUSE IN PUPILS (PREP SCHOOL AGE 2-11)

- hint about secrets they cannot tell
- say that a friend has a problem
- ask you if you will keep a secret if they tell you something
- begin lying, stealing, blatantly cheating in the hope of being caught
- have unexplained sources of money
- have terrifying dreams
- start wetting themselves
- exhibit sudden inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- stop enjoying previously liked activities, such as music, sports, art, scouts or guides, going to summer camp, gym club
- be reluctant to undress for gym
- become fearful of or refuse to see certain adults for no apparent reason; show dislike of a particular babysitter, relative or other adult
- act in a sexual way inappropriate to their age
- draw sexually explicit pictures depicting some act of abuse
- seem to be keeping secret something which is worrying them
- have urinary infections, bleeding or soreness in the genital or anal areas
- have soreness or bleeding in the throat
- have chronic ailments, such as stomach pains or headaches
- take over the parent role at home, seem old beyond their years (if a victim of incest)
- develop eating disorders, such as anorexia or bulimia
- become severely depressed, even attempt suicide
- have a poor self-image, self-mutilate
- continually run away

YOUNG PEOPLE OF SENIOR SCHOOL AGE (11-18 onwards) MAY:

- be chronically depressed be suicidal
- use drugs or drink to excess
- self-mutilate, show self-hatred
- have unexplained pregnancies
- experience memory loss
- become anorexic or bulimic
- run away frequently
- be inappropriately seductive
- be fearful about certain people like relatives or friends
- assume the role of parents in the house to such an extent that they do all the cooking, cleaning, child-minding and are taking care of everyone's needs except their own
- not be allowed to go out on dates or have friends round
- have soreness/bleeding in the genital or anal areas or in the throat
- find excuses not to go home or to a particular place
- have recurring nightmares/be afraid of the dark
- be unable to concentrate, seem to be in a world of their own
- have a 'friend who has a problem' and then tell about the abuse of the friend
- have chronic ailments such as stomach pains and headaches
- sexually abuse a child, sibling or friend
- exhibit a sudden change in schoolwork habits, become truant
- be withdrawn, isolated, or excessively worried • have outbursts of anger or irritability
- be fearful of undressing for gym
- have unexplained sums of money
- act in a sexually inappropriate way towards adults

RECOGNISING ABUSE (NEGLECT)

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

POSSIBLE SIGNS OF NEGLECT

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- frequent lateness or non-attendance at school
- untreated medical problems
- destructive tendencies low self-esteem
- neurotic behaviour (e.g. rocking, hair-twisting; thumb-sucking)
- no social relationships

[Child Sexual Exploitation \(CSE\) \(Further information in KCSIE Annex A\)](#)

Sexual exploitation of children involves situations where young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Children do not become entrenched in CSE without first being subjected to targeted grooming or opportunistic abuse. Systemic sexual abuse is the final stage in a process. The Swaminarayan School recognise that pupils may be targeted for sexual exploitation, and staff will be vigilant for the indicators and report concerns to their DSL. The DSL is conversant with the LSCB procedures and will share information with parents and carers, and the police and social care in appropriate circumstances. We will work with other agencies on plans to protect children who are deemed to be at risk of exploitation. The Swaminarayan School believes that children need to understand how perpetrators groom children for exploitation. We will use appropriate resources in a sensitive and responsible way to educate young people about grooming behaviours, the risk of being drawn into exploitation, possible consequences, and ways of protecting themselves from the risk of sexual exploitation.

[Female genital mutilation \(FGM\) \(Further information in KCSIE Annex A\)](#)

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. The mandatory reporting duty commenced in October 2015. Teachers should notify the DSL as soon as possible if they have made an FGM referral.

[Forced Marriage \(Further information in KCSIE Annex A\)](#)

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).

[Appendix 5 Radicalisation and the PREVENT Duty \(Further information in KCSIE Annex A\)](#)

Our school recognises the duties placed on us by the Counter Terrorism Bill (July 2015) to prevent our pupils being drawn into terrorism. These include:

- Assessing the risk of pupils being drawn into terrorism
- Working in partnership with relevant agencies under the LSCB procedures
- Appropriate staff training
- Appropriate online filtering

Our school is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; the pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Our school seeks to protect children and young people against the messages of all violent extremism including but not restricted to those linked to Islamic Ideology, Far Right / Neo Nazi ideology etc. Concerns should be referred to the Single Point Of Contact (SPOC) (the Designated Safeguarding Lead) who has local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.

The School has adopted the Governments' definitions for the purposes of compliance with the Prevent duty: Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism".

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel (a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism).

Prevent Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race / hate crime, lack of self-esteem or identity and personal or political grievances.

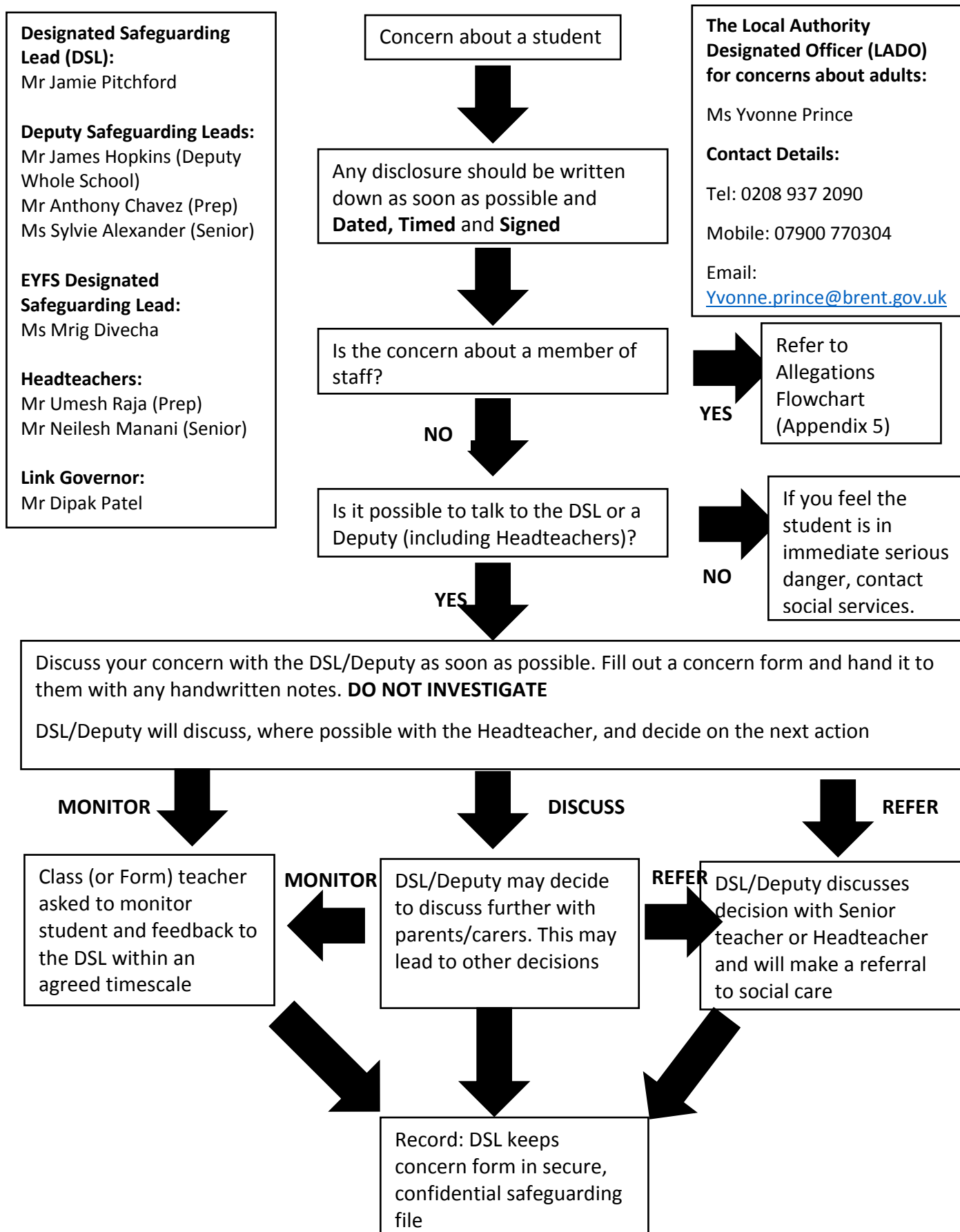
51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increased time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day to day behaviour becoming increasingly centred around an 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;
- communications with others that suggest identification with a group / cause / ideology

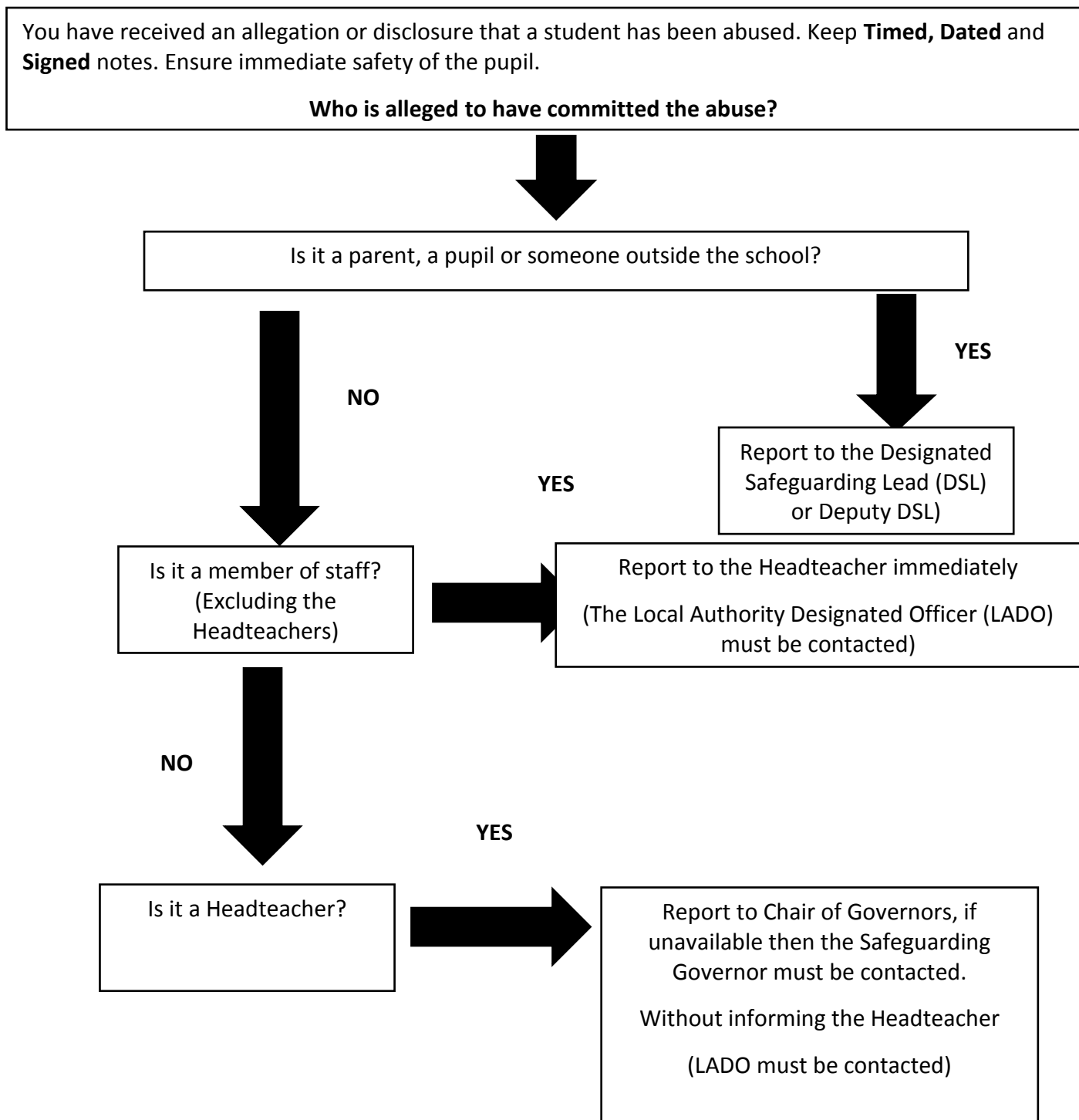
52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social and 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."

Appendix 4 – Flowchart for a Member of Staff Worried About a Pupil



Appendix 5 – Allegations Flowchart



Any member of staff can and should feel able to make a referral in exceptional circumstance. If the issue involves the potential for serious harm the children's social care should be informed from the outset. For further information read the Whistleblowing Policy (7b Whistleblowing Policy)

Remember to keep discretion and not to discuss the matter other than to inform the relevant staff.

Appendix 6 – Radicalisation and Extremism Risk Assessment

Does the school have a policy?

Yes Safeguarding policy with section specifically addressing radicalisation.

Does the school work with outside agencies on radicalisation and extremism e.g. Channel? No We would if we had a concern raised. Channel is referred to in the Safeguarding policy.

Have staff received appropriate training? Yes. Online modules completed on Channel

Has the school got a trained Prevent Lead? Yes. It is the DSL. The DSL has completed an Online Prevent Course provided by the Home Office June 2018. Further Training to take place.

Do staff know who to discuss concerns with? Yes. DSL Specified in SG policy and staff were reminded during meetings.

Is suitable filtering of the internet in place? Yes. DSL discussed filtering with Computing Manager from NK Computers and is assured that appropriate filters are in place.

Do children know who to talk to about their concerns? Yes. Information displayed in Learning areas.

Are there opportunities for children to learn about radicalisation and extremism? Limited but yes. Work in progress. Units are being enhanced for the PSHCE programme.

Have any cases been reported? No, no referrals to date

Are individual pupils risk assessed? No. Individual pupils would be assessed and monitored if suspicions were raised. When appropriate the concern would be reported to Channel.

What factors make the school community potentially vulnerable to being radicalised? (e.g. EDL local base, extreme)? Predominantly Hindu population within the school but risk of out of school or online exposure religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents.

Comment on the school's community, locality and relevant history. Co-educational independent school with no defined catchment area located in an urban location thus no major influence from local community groups. Good Hindi ethos with children of other faiths also present (eg, Staff children). Clear evidence of absolute integration amongst friendship groups throughout the school and trips to other places of worship among the main faiths across Year groups.

Risk evaluation: Low

Way Forward

Monitor influence of online and external groups.

Monitor pastoral issues for trends in marginalization and isolation

Date completed.....10 August 2018. Signed J.Pitchford

Appendix 7 – Protocol for visiting speakers

The Swaminarayan School will request that:

1. An organiser for the visitor/speaker is provided who will be the liaison with school.
2. The organiser must ascertain that all information communicated by the visitor/speaker is lawful and aligns to the values and ethos of the school and to British values.
3. The record of checks on visiting speakers which is held by the DSL on a Visiting Speaker Form sent in advance of the meeting.

Further guidelines School safeguarding procedures apply and visiting speakers will be issued with a visitors badge which includes visitor information which they will be asked to familiarise themselves with and wear at all times. Visitors must be accompanied at all times whilst they are on the school site. Staff assigned are required to monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the speech does not meet this requirement, immediate action must be taken by the member of staff to balance the information given and this must be reported to a Senior Teacher immediately after the talk/visit.

Post speech/ visit evaluation ([Appendix 8](#)): The speech/ visit is evaluated by the organiser as to whether it met the needs of our students. Should the visit/speaker not meet the needs of our students then this will be clearly communicated to the visiting speaker/institution. The evaluation and communication with the visitor must be completed by the organising member of staff.

We are very grateful to have a wide range of visiting speakers coming to The Swaminarayan School to share their thoughts, ideas and experiences. We would draw your attention to the following guidelines for all visiting speakers:

- *Please be aware of the Hindu Ethos on which the school is based*
- *Please be aware that as a school we are fully supportive of fundamental British values, which include democracy, the rule of law, individual liberty and mutual respect and a tolerance of those with different faiths and beliefs.*
- *Please understand that The Swaminarayan School does not intend to offer a platform for individuals who might espouse racist, homophobic, sexist, ageist or extremist views or anyone who might be trying to incite young people to violence or extremism of any form.*

Having said this, we welcome people of all backgrounds, ethnicities, beliefs and experiences and we look forward to hearing what you have to share with us.

Appendix 8 – Forms for Visiting Speaker

The School will ensure that any visiting speakers who might fall within the scope of the Prevent duty, whether invited by staff or pupils, are suitable and appropriately supervised. Our responsibility to our students is to ensure that the information they receive is aligned to the values of our School and British values which include democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Further guidelines and information can be found in our Safeguarding policy: [Appendix 7](#)

Staff organiser:

Name of the Speaker: Institution:.....

Subject of the visit:

Year group involved: Date of the visit:.....

- | | |
|---|---------------------------------|
| 1. Outside speakers discussed with the Head Teacher | Yes · No · |
| 2. Biography of the speaker or institution provided <u>and attached</u> | Yes · No · |
| 3. Assurances that all information communicated by the visitor will be lawful | Yes · No · |
| 4. Internet search on visitor/speaker completed <u>and attached</u> | Yes · No · |
| 5. Conversation with speaker regarding the content of the speech, including an understanding that their presentation will be brought to an early end if the content proves unsuitable | Yes · No · |
| 6. Head Teacher's permission for fundraising, if applicable | Yes · No · |
| 7. <i>Visiting Speaker Guidelines*</i> sent out to the speaker
<i>found in 7a safeguarding policy 5.3</i> | Yes · No · <i>*these can be</i> |
| 8. Permission from Head Teacher granted | Yes · No · |

Organiser's signature Date:

Head Teacher's signature: Date:

I agree to abide by the school's equality commitments; that there will be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there will be no extremist material.

Guest Speaker's signature:: Date:

Visiting Speaker Evaluation Form

Please complete this form and hand to the DSL

Speaker, subject, and date of visit:
Organising teacher:
Feedback from staff:
Any contentious subject areas or comments:
Would you book the speaker again in the future? Why or why not?
Any other comments?
Organiser signature and date:

Appendix 9 – Staff Expectations

STAFF CODE OF CONDUCT IS CONTAINED IN THE Department of Schools, Children and Families DOCUMENT

- ‘Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings’.

<http://www.safeguardingschools.co.uk/wp-content/uploads/2013/06/Guidance-for-safer-workingpractice-for-adults-who-work-with-children-and-young-people.pdf>

The Staff are expected to read and agree to the staff Code of Conduct (7e)

This is a summary of the key points:

Staff should be guided by the following advice in an attempt to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid physical contact with pupils unless absolutely necessary. There are occasions when physical contact with a child may be proper or necessary, for example to demonstrate exercises or techniques during sports lessons. However, staff should always be able to justify why they made physical contact in any situation and the nature of the contact should be limited to what is appropriate
- Avoid being alone with a pupil if possible. There will be occasions when a confidential interview or a 1:1 meeting is necessary, but, where possible, such interviews should be conducted in a room with visual access, or with the door open, or in a room or area which is likely to be frequented by other people, and another pupil or adult should be present or nearby.
- Maintain a professional tone and attitude when talking to students, avoiding overly personal comments, sarcasm, demeaning or insensitive comments and avoiding over-friendliness. Comments on a student’s appearance should only be made in reference to an infringement of the dress code.
- Avoid discrimination against, or favour particular children to the exclusion of others.
- Never condone, or participate in, the behaviour of children which is illegal, unsafe or abusive
- Ensure that dress is appropriate to the formal environment in which you are working; clothing which could be seen as provocative should be avoided
- Staff are advised wherever possible not to transport pupils singly (eg in a car or minibus).
- Staff should be particularly careful when supervising pupils in extracurricular activities, residential trips or Duke of Edinburgh expedition. Typically, a less formal approach than usual is appropriate in these settings, but that can be open to misinterpretation. Although a more informal approach is usual in such circumstances, the standard of behaviour expected of staff will be no different from that expected within school.
- Alert the Head teacher or member of the safeguarding team if you feel a student is taking too personal an interest in you.
- The school operates a whistle blowing procedure by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff have a responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

Social media and other communication

Staff should never communicate with pupils through their own mobile phone number or email address: any necessary communication should be through school numbers and addresses which are monitored. For trips and visits, sports fixtures and day events, staff are asked under normal circumstances to use a School mobile phone for all communication with students and parents.

- Staff should also ensure that any social networking sites they use have the tightest security settings; school students should not be accepted as friends.)
- Staff should not use personal mobile devices to take and store images of children in a school setting.

Pupil/Teacher Relationships

The growth of a friendly relationship between teacher and pupil which is based on mutual respect and recognition of the role that each plays in the learning situation is desirable. It is, however, an abuse of this professional relationship for a teacher to:

- a. enter into an improper association with a pupil;
- b. show undue personal favour or disfavour towards a pupil;
- c. commit such acts against a child which are illegal;
- d. endeavour to exert an undue influence with regard to personal attitudes, opinions or behaviour which are in no way connected with the work of the school.

Whistleblowing (see policy 7b Whistleblowing for more details)

Whistleblowing is when a member of staff or parent reports suspected wrongdoing at the school. Officially this is called 'making a disclosure in the public interest'.

The Swaminarayan School encourages the whistleblower to raise the matter internally in the first instance to allow those Governors and school staff in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity. We have designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter:

- Chairman of Governors
- Head Teachers of each school
- Any Governor
- Chairman of the Personnel Committee
- Chairman of the Finance Committee

Acceptable Use of Technology Policy (see policy B55 Computer Use and Internet Acceptable Use Policy for more details)

Staff are only permitted to use the Internet for personal use (this includes email) outside of their normal working hours (use is permitted during staff break and lunchtimes). Online activities which are encouraged include:

- The use of email and computer conferencing for communication: between colleagues, between students(s) and teacher(s), between student(s) and student(s), between schools and industry.
- Use of the Internet to investigate and research school subjects, cross-curricular themes or topics related to social and personal development.
- The development of students' competence in ICT skills and their general research skills.

Online and other activities which are not permitted include:

- Searching, viewing or retrieving materials that are not related to the aims of the curriculum.
- Copying, saving or redistributing copyright-protected material, without approval.
- Subscribing to any services or ordering goods or services, unless specifically approved by the school.
- Playing computer games or using other interactive 'chat' or 'social' sites unless specifically approved by the school.
- Using the network in such a way that use of the network by other users is disrupted (for example: downloading large files during peak usage times; sending mass email messages).
- Publishing, sharing or distributing any personal information about a user (such as: home address; email address; phone number; etc).
- Downloading software.
- Taking and storing images of children, sexual content, students using mobile phones.
- Any activity that violates TSS school rule.

Appendix 10 – Peer on Peer Sexual Harassment and Sexual Abuse

Schools' responsibilities

16. Schools must enter pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.

17. Schools must monitor pupils' attendance through their daily register. Schools should agree with their local authority the intervals at which they will inform local authorities of the details of pupils who fail to attend regularly, or have missed ten school days or more without permission. Schools should monitor attendance closely and address poor or irregular attendance. It is important that pupils' poor attendance is referred to the local authority.

18. Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days¹⁶, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

19. Schools must also arrange full-time education for excluded pupils from the sixth school day of a fixed period exclusion. This information can be found in the Exclusion from maintained schools, academies and pupil referral units in England statutory guidance.

20. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty¹⁹ for their pupils. Further information about schools' safeguarding responsibilities can be found in the Keeping children safe in education statutory guidance.

Taken from the Children Missing Education (September 2016) ([Link](#))

Part three: A whole school or college approach to preventing child on child sexual violence and sexual harassment

A whole school or college approach to safeguarding and child protection

27. The best schools and colleges take a whole school or college approach to safeguarding and child protection. This means involving everyone in the school or college, including the governing body or proprietor, all the staff, children, adult students and parents and carers.

28. Safeguarding and child protection should be a recurrent theme running through policies and procedures. The schools or college's approach to sexual violence and sexual harassment should reflect and be part of the broader approach to safeguarding.

29. The schools or college's safeguarding procedures with regard to sexual violence and sexual harassment should be transparent, clear and easy to understand for staff, pupils, students, parents and carers.

Contextual Safeguarding

30. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual safeguarding](#).

Safeguarding training

31. Decisions relating to teachers' professional development rightly rest with schools, colleges, headteachers, principals and teachers themselves, as they are in the best position to assess their individual requirements and also take into consideration local priorities and local issues. The Standard for Teachers' Professional Development is here: [teachers' professional development](#). 32. As per Part one of Keeping Children Safe in Education, as part of their child 16 protection and safeguarding training, schools and colleges should consider the importance of their staff being aware of the different types of abuse and neglect. Equally important is that staff know what to do if they have a concern about a child, how to respond to a report of abuse, how to offer support to children and where to go to if they need support.

The role of education in prevention

33. Schools and colleges can play an important role in preventative education. Keeping Children Safe in Education sets out that all schools and colleges should ensure children are taught about safeguarding, including how to stay safe online. Schools should consider this as part of providing a broad and balanced curriculum.

A planned curriculum as part of a whole school approach

34. The most effective preventative education programme will be through a whole school approach that prepares pupils for life in modern Britain. The school will have a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school life. This will be underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the whole curriculum. Such a programme should be developed to be age and stage of development appropriate (especially when considering SEND children and their cognitive understanding), and may tackle such issues as:

- healthy and respectful relationships;
- what respectful behaviour looks like; • consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment.

35. Schools often deliver this currently, through planned, high-quality, Sex and Relationship Education (SRE) and Personal, Social, Health and Economic (PSHE) education programmes. More information about PSHE can be found here. The PSHE Association provides guidance to schools on developing their PSHE curriculum. See: www.pshe-association.org.uk. Colleges often do this via tutorials.

36. The Children and Social Work Act 2017 placed a duty on the Secretary of State to make Relationships Education compulsory for all pupils receiving primary education and Relationships and Sex Education (RSE, to replace sex education) compulsory for all pupils receiving secondary education. It also gave the Secretary of State a power to make PSHE, or elements therein, compulsory in all schools. The decision regarding PSHE is subject to further careful consideration. The department is currently engaging with experts, schools, parents and young people to determine what these subjects will look like and whether or not to make PSHE, or elements therein, compulsory. This will be followed by a formal consultation on regulations and guidance before the new subjects are made compulsory.

37. Good practice allows children an open forum to talk things through. Such discussions can lead to increased safeguarding reports. Children should be made aware of the processes to raise their concerns or make a report and how any report will be handled. This should include processes when they have a concern about a friend or peer. All staff should be aware of how to support children and how to manage a safeguarding report from a child (as per paragraph 17 of Keeping Children safe in Education).

Specialist support and interventions

38. As part of their approach to sexual violence and sexual harassment, schools and colleges should consider carefully if external input is necessary. This might be to train and/or support their staff, teach their children and/or provide support to their children.

39. Specialist organisations can offer a different perspective and expert knowledge. It is good practice for schools and colleges to assure themselves of the quality of any specialist provider with whom they engage. This may take the form of written testimonials or engaging with a provider that is well known and established. See Annex A for a list of some of the available specialist support services.

Taken from Sexual violence and sexual harassment between children in schools and colleges (May 2018) ([Link](#))

Appendix 12 – Staff and Mobile phones

Taken from the code of conduct:

1. “Mobile Phones

There should be no reason for teaching staff to have their mobile phones switched on during the school day. In particular, staff must not use their mobiles during lessons, in the presence of pupils this includes whilst on school trips. If a member of staff wishes to use their mobile phone during break time, lunch break or after school, they should use it either in the staff room or an unoccupied classroom. Staff should note that mobile phones are banned between 8am and 4pm for pupils except 6th Form students.

Staff should not use their phones for taking any photographs of pupils. Nor should they share any photographic or other images of pupils with anyone outside the school.

Staff must not use personal mobiles to contact students. The school has purchased two mobile phones for use on school trips. They are available from the bursar’s assistant.

Staff should not have the phones in their possession whilst they are in the Early Years and Foundation Stage (EYFS). This is to protect all those concerned.”

Summary

- This clearly mentions that Staff should not have their phones on them in the EYFS area
- That staff should not have the phone on show to students
- To use the phone around students
- To take photo or videos on students with mobile phones

Appendix 13 – Student Changing Guidelines

There is no current legislation around safe changing practices in primary schools; it is up to individual schools to write their own guidelines. This is a guideline for how The Swaminarayan School will handle changing for PE lessons or other activities.

These guidelines are in place because:

- Getting changed can make some children feel vulnerable
- Getting changed can cause anxiety for some children
- Finally and most importantly, staff can feel unsure about PE changing supervision and how to ensure that both children and adults are **safe**.

Changing Areas

At The Swaminarayan School, students will generally change in the changing rooms. For PE students in Reception and Key Stage 1 will come to school in their PE kit. Other events may mean that it is not possible to change in the changing rooms. Where this happens, please follow these guidelines:

- Use single gender changing rooms or areas. Do not have mixed genders changing in one room. If this is not possible and there is mixed gender changing in a room, please use furniture or screens to provide separate areas.
- Staff need to treat all pupils fairly and with respect for their privacy and dignity.
- Staff should make adequate and sensitive arrangements for changing which take into account the needs of pupils with disabilities and children from different religions, beliefs and cultural backgrounds or gender identity.
- Adults must always change or shower privately; never in the same space as children.

Staff Supervision

It should not be necessary for adults to remain in the room in order to maintain good behaviour; being in close proximity and pupils being aware of this should be enough. Pupils should know that adults might enter the room if necessary - in response to a disturbance, for example.

When supervising changing consider the following:

- It is often possible to leave the door of designated changing rooms slightly open, without hindering the students' privacy.
- If an adult needs to enter a room for any reason then it is best to announce this to the students before entering and give them the chance to cover up.
- Where possible, female staff should supervise girls and male staff should supervise boys.
- All adults, but particularly those of the opposite gender, should avoid just standing in the changing room watching pupils, or repeatedly going in and out without good reason.
- Establish a code of behaviour with students so they are clear about expectations about their conduct whilst they are unsupervised.
- Students who express concern about the behaviour of a member of staff or other pupils should be listened to, and reported to the Headteacher, in line with the Safeguarding policy.

Pupils who need assistance with getting changed

Currently students within the Prep school who need assistance with changing. Except for within EYFS. For this area and in case of a change of circumstances.

- If necessary, offer assistance openly and not out of sight of others.
- Encourage pupils to be as independent as possible; offer verbal help and encouragement before offering any physical assistance.
- Refer to the EYFS policy when dealing with children of a younger age.
- If a student will require regular assistance with getting changed this will need to be discussed with parents and the student themselves (For KS1 and KS2).
- Be especially careful when helping children with underclothes, tights and swimming costumes.

Using off-site changing rooms

Schools will need to think about what safeguards need to be put in place to protect children when visiting other sites and consider the following:

- It is not appropriate for school swimmers (for example) to share changing facilities with members of the public (unless this has been carefully risk assessed). If school sessions precede or are followed by public sessions, enough time should be booked either side of the swimming session to allow pupils to get showered and changed before the public are allowed in. This should be liaised with the venue and any concerns brought to both the venues and school's attention.
- As far as possible, members of staff should only supervise students of the same gender.
- If changing areas are shared with students from another school, particularly those who are older/younger, adults from both/all schools should take this into consideration and properly risk assess together. Communicate effectively with the lead from the other school and venue.

Useful Links

NSPCC – [The Underwear Rule \(PANTS\) – Resources for schools and teachers](#)

NSPCC – [Factsheet for Schools: Getting changed for PE](#)

NHS – [Stages of Puberty](#)

The School's Safeguarding policy is on the website – [TSSUK.org](#)

The School's EYFS policy can be requested or accessed on the Shared Drive.

Written: Mr J Pitchford May 2018