



Safeguarding and Child Protection Policy

Review cycle: Annually

Last Review Date: Sept 2021

Next Review Date: Sept 2022

Staff responsible: SLT

Governor responsible: Mr P MacDougall, Mr J Fowler, Board

It must be read in conjunction with Guide to Professional Conduct (Staff handbook 3.2)

This Policy is part of the Staff Induction

THIS POLICY IS APPLICABLE TO ALL PUPILS, INCLUDING THOSE IN THE EYFS



ST JOHN'S SCHOOL, NORTHWOOD POLICY FOR SAFEGUARDING CHILDREN

Designated Safeguarding Lead:

Mrs J Savage (Deputy Head, Pastoral)
jsavage@st-johns.org.uk

Deputy Designated Safeguarding Lead:

Miss K Morgan (Head of Lower School)
kmorgan@st-johns.org.uk

Designated Governor:

Mr P MacDougall
pmacdougall@st-johns.org.uk

Interim Chair of Governors:

Mr J Fowler
jfowler@st-johns.org.uk

Alternatively please contact the St John's School Office: Tel 020 8866 0067

This policy is reviewed annually during the Autumn Term by the full governing body; the full board review and ratify the policy, receive a report from the DSL and minute in detail that this has been done; it is signed-off by the Chair of Governors.

Last revision of policy:

September 2021

Review Cycle:

Autumn Term - Annually

Staff responsible:

Senior Leadership Team and designated Governor.

Last Board Approval:

November 2021

Safeguarding Governor Approval:

September 2021



Person responsible for review:	Deputy Head (Pastoral)
Person responsible for policy:	Headmaster
This document appears on:	School website, all Parent Handbooks and the ISI Portal

THIS POLICY APPLIES TO EYFS AND KEY STAGES 1 TO 3

It is compliant with ISI Regulations & ISI Updates to include [Keeping Children Safe in Education 2021](#) (which includes the additional statutory guidance, and further [Working Together to Safeguard Children 2018](#)). It takes into account advice from the Hillingdon Social Care Department and Hillingdon Local Safeguarding Children Board (<http://hillingdonlscb.org.uk/>) which follows The London Procedures. We liaise closely with Hillingdon's Child Protection officer who carries out training on a regular basis. Other statutory guidance that this policy has regard for is the [Prevent Duty Guidance for England and Wales](#) (April 2021) and further supplementary non-statutory guidance [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015) and [the use of social media for on-line radicalisation](#) (July 2015)

Deficiencies of this policy are remedied swiftly against the ISI Regulatory Handbook

Contents of policy for Safeguarding:

1. Introduction	Page 5
1.1 Definition of Safeguarding	Page 5
1.2 Aims	Page 5
1.3 Success Criteria	Page 5
2. St John's Procedures	Page 5
2.1 Appointment of Staff	Page 5
2.2 School procedure in the event of an allegation of abuse against a member of staff or volunteer	Page 6
2.3 School procedures in the case of alleged abuse of pupils	Page 7
2.4 Reporting to Disclosure and Barring Service	Page 8
3. Reporting Arrangements	Page 9
3.1 Reporting	Page 9
3.2 Record keeping	Page 10
3.3 LADO contact details	Page 10
4. Training	Page 11
4.1 DSLs	Page 11
4.2 All other staff	Page 11
4.3 Training details	Page 11
5. Evaluation/Monitoring of this policy	Page 13
5.1 Pastoral Committee	Page 13
5.2 Nominated governor	Page 13
6. Further information and useful documents	Page 13



6.1	DSL has the following or they can be downloaded	Page 13
7.	Code of conduct for Staff contact with pupils	Page 13
7.1	General	Page 13
7.2	Physical Contact	Page 13
7.3	Action to prevent harm or injury to the pupil or to others	Page 14
7.4	Comforting a pupil in distress	Page 14
7.5	Unavoidable contact	Page 14
7.6	Corporal Punishment	Page 14
7.7	Private meetings	Page 14
7.8	First Aid	Page 14
7.9	Teaching materials	Page 14
7.10	Reporting Incidents	Page 14
7.11	Personal letters, mobile phones, photography and on-line communication	Page 15
7.12	Staff contact with pupils	Page 15
7.13	Footnote	Page 15
8.	What is abuse and neglect?	Page 15
8.1	Definition of Significant Harm	Page 15
8.2	Abuse	Page 16
8.3	Physical Abuse	Page 17
8.4	Emotional Abuse	Page 17
8.5	Sexual Abuse including Child Sexual Exploitation	Page 17
8.6	Neglect	Page 19
8.7	Domestic Abuse	Page 19
8.8	Peer on Peer (Child on Child) Abuse	Page 21
8.9	Online Safety	Page 23
8.10	Other types of Abuse and Neglect	Page 24
9.	Symptoms and signs of abuse	Page 26
9.1	Signs of physical abuse	Page 26
9.2	Signs of emotional abuse	Page 26
9.3	Signs of sexual abuse	Page 26
9.4	Signs of Neglect	Page 27
9.5	Racial, cultural and religious patterns	Page 27
9.6	Mental Health	Page 27
10.	Radicalisation, Extremism and Terrorism	Page 28
Appendix A:	St John's School Safeguarding Incident Report	Page 30
Appendix B:	Confirmation of having read Part 1 and Annex B of the Keeping Children Safe in Education documentation	Page 31
Appendix C:	Whistleblowing Policy	Page 32
Appendix D:	The Role of the Designated Safeguarding Lead	Page 34
Appendix E:	The new Prevent Referral process	Page 38
Appendix F:	The Prevent Referral form	Page 39
Appendix G:	Operation Encompass Safeguarding Statement	Page 42
Appendix H:	Low-Level Concerns Policy	Page 43



1. Introduction

1.1 **Definition of Safeguarding**

Safeguarding is defined as protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

1.2 **Aims**

At St John's we understand that we have a duty both to children in need and to children at risk of harm. The School aims to ensure that pupils live and work in a safe environment where they are respected and listened to by all members of staff. The School makes provision for teaching children to keep themselves safe, including online. In this environment we want children to feel confident and be able to approach members of staff about matters of concern to them. The staff will create and maintain a safe learning and social environment for all the children. The school will contribute through the curriculum by developing children's understanding and awareness of their welfare and protection. Through the School's PSHCEE program the children will get the opportunity to learn about safeguarding and e-safety. It will identify when a child has welfare concerns and take the appropriate action to address them in partnership with other agencies when appropriate. It will ensure, through regular training, that all staff are aware of how to recognise and respond to safeguarding concerns, including signs of possible maltreatment and peer on peer abuse. At St John's we try to create a safe environment and culture where concerns can be raised, this includes whistleblowing on poor or unsafe practice (see Appendix C).

1.3 **Success criteria**

For our policy to be successful it is important that issues are dealt with sensitively and effectively. All records should be accurate and safely stored. Where necessary, in the interest of the child, information will be passed on to the relevant agencies.

2. St John's Procedures

2.1 **Appointment of staff**

- 2.1.1 The Headmaster and Governors, when appointing staff, take account of the guidance issued by the DfE and carry out the following safeguarding checks in accordance with the School's policy on [Safer Recruitment](#)
- 2.1.2 That the recruitment process is undertaken by trained staff i.e. those who have completed online training in safer recruitment
- 2.1.3 That documentation sent out to potential candidates makes it clear that child protection is a high priority of the School and that rigorous checks will be made before appointments are confirmed
- 2.1.4 That a prohibition order check will be carried out and recorded on the single central register of appointments. This includes prohibition from management on internal promotions
- 2.1.5 That enhanced Disclosure and Barring Service checks will be carried out for any appointed staff or regular helpers. Staff and helpers who have recently moved to the UK will be asked to produce a letter of professional standing from the regulatory body of the country in question. This also applies to UK citizens who have worked



- 2.1.6 That appropriate checks to confirm identity, medical fitness, right to work and qualifications will be carried out
- 2.1.7 That two references (professional and character) as to the suitability of a candidate to work with children will always be obtained from the last employer
- 2.1.8 That at interview candidates will be asked to account for any gaps in their employment history
- 2.1.9 Assurance is obtained that appropriate child protection checks are carried out on staff from outside agencies and other educational venues where necessary
- 2.1.10 As required by Prevent, where external speakers are invited into school whether invited by staff or by the pupils themselves, they will be suitably and appropriately supervised. The member of staff who has invited the speaker in will inform the DSL of who the speaker is and the purpose of the talk. The DSL will carry out any checks that are deemed necessary to verify the identity and purpose of the speaker
- 2.1.11 The School will consider ongoing suitability of staff and volunteers working with children.

2.2 **School procedure in the event of an allegation of abuse against a member of staff, a volunteer or the Headmaster**

Following the publication of Part 4 of KCSIE the School recognises the need to approach these situations with common sense and judgement. However, immediate contact will be made with the LADO when an allegation is made. Key points to note are the following:

- 2.2.1 If an allegation is made against a teacher or volunteer the quick resolution of that allegation should be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. The School will not undertake any investigation of allegations without prior consultation with the Local authority designated officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. Where there is a conflict of interest in reporting the matter to the Headmaster, it should be referred directly to the LADO. In borderline cases, discussions with the LADO will be held informally and without naming the school and individual. If a member of staff or volunteer is accused of abuse the Headmaster must be informed immediately or in his absence the Chair of Governors. If the allegation is against the Headmaster then the Chair of Governors must be contacted without informing the Headmaster. The Chair of Governors will then liaise with the local authority on issues of child protection or in case of allegations against the Headmaster or a member of the governing body. In the event of an allegation of abuse or suspicion of abuse directed against anyone working in the School, the function of the LADO is to provide advice and also to preside over the investigation of any allegation.
- 2.2.2 In response to an allegation, staff or volunteer suspension is not the default option. The School will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Due weight will be given to the views of the LADO, KCSIE, RSE and Health Statutory Guidance 2020 and Working Together (WT). An individual will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons. A suspension does not imply guilt; it is for the protection of both child and adult. It is important to maintain confidentiality to avoid unwanted publicity, up to the point where the accused person is charged with an offence or a national body (DfE, TRA) publishes information about an investigation or decision in



a disciplinary case.

- 2.2.3 The School will not undertake any investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO). The Headmaster and the Governors will then investigate the allegations immediately following the LADO's advice. A decision as to the course of action will be arrived at as soon as possible. If the allegation is not substantiated the member of staff or volunteer will be reinstated. If there is any substance to the allegation disciplinary procedures will be initiated and investigations will take place involving Social Care and the Police. If the School dispenses with a teacher or volunteer's services then a report will be sent promptly to the Disclosure and Barring Service because of unsuitability to work with children. This applies to any person (whether employee, contractor, volunteer or student) who has harmed or poses a risk of harm to a child who has then been removed from working (paid or unpaid) with children or would have been removed if hadn't left earlier. The School will also make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'. The School will follow the guidelines issued by the TRA, [Teacher misconduct: the prohibition of teachers \(Oct 2018\)](#)
- 2.2.4 Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references.
- 2.2.5 Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).
- 2.2.6 For low level concerns about a member of staff or volunteer please refer to the [Low Level Concerns Policy](#) which can be found set out in Appendix H.

2.3 School procedures in the case of alleged abuse of pupils

In cases of suspected or alleged abuse of pupils, it is therefore important that there is a clear and standard procedure to be followed at the School which is fully understood by staff and consistent with the recommendations of the local Safeguarding Body. (NB a note of the following is posted in all teaching and non-teaching departments).



2.4.1 Should a pupil report to you in the first instance that he is suffering abuse, then:

LISTEN:	To the child and allow them to talk freely
ASK:	'Can you tell me who it was?' If they won't answer, don't push them or offer suggestions.
STOP	Don't ask leading questions. We are here to gather information in order to make a referral and not to investigate.
TELL	The child they are not to blame.
TAKE SERIOUSLY	What the child has said. We should not make judgements about the information given.
AFFIRM	'I am glad you told me. It was right to tell me. You have been brave and strong to tell me.'
REFER	Tell the child you must tell other people who can help. Tell the DSL who will pass on the disclosure or allegation to the appropriate external agencies for advice.
PUT IN WRITING	What the child has told you within 24 hours

2.4.2 NEVER TELL A CHILD YOU WILL KEEP A SECRET THEY TOLD YOU

- 2.4.3 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 2.4.4 Should other pupils or adults inform you of their suspicions of abuse, or should you yourself suspect it from what you see or hear, then invite the 'victim' to confide in you. This is probably best done by the form/class teacher. If, after following the procedure above, you have the slightest reasons to feel that it might be a genuine case, then report it to the DSL.
- 2.4.5 Except in cases where it is clearly appropriate to inform the parents at an appropriate stage, or where the information itself comes from the parents, they will not normally be informed until the matter has been reported to the local Safeguarding Body, who will usually inform parents themselves. The DSL will contribute in any way possible with inter-agency working to resolve the child protection issue that may arise from a referral to the local Safeguarding Body.



3. Reporting arrangements

3.1. Reporting

The reporting of safeguarding concerns are set out below, however, it must be stated that safeguarding is everyone's responsibility and that anyone can make a referral to children's social care. We must take care not to impose high thresholds for making such a referral either in this policy or in our safeguarding practice. At St John's we take seriously that we have a duty to protect both children in need and to children at risk of harm.

There is a need for staff to differentiate between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. Where significant harm is likely then children's social care should be informed immediately; additional support can be provided however, using local processes including the use of the 'common assessment framework' and the 'Team around the child' approaches. It is of the utmost importance that the DSL makes prompt contact with children's social care where there are concerns that a child may be in need of help or at risk and/or with the LADO in relation to allegations against someone working in the school and/or with the police if a criminal offence is suspected. This is equally true of a child who is at risk of being drawn into terrorism, the same reporting procedures apply (see 3.3 for contact details of Hillingdon's Prevent Lead).

3.1.1. Reporting allegations or suspicions of abuse

If a member of staff is concerned about a child they must inform the DSL immediately.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear and factual account. (Use Appendix A or CPOMS)

The DSL will consult the Headmaster who will decide that the allegations or suspicions of abuse (this includes where there are concerns about children who may be drawn into terrorism) will be referred to the local authority designated officer (LADO). When deciding to make a referral the Headmaster and DSL will not make their own decision over what appears to be a borderline case, but the doubts and concerns will be discussed with the LADO. This may be done without giving names in the first instance. However, if at any time there is a risk of immediate serious harm to a child, a referral will be made to children's social care immediately. Although the responsibility for making referrals rests with the DSL ultimately, any member of staff can make a referral if necessary. Referrals are made using the [MASH inter-agency referral form](#) available from the DSL or from the staff handbook.

The school should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse without first taking advice from the LADO.

If it is decided to make a referral, this will be done, if necessary, without prior discussion with the parents. This applies especially if the child is at risk of significant harm.

A Safeguarding Incident Report form (see Appendix A or CPOMS dashboard) will be completed and sent to the LADO within 24 hours.

These procedures adhere to the requirements of the Hillingdon Local Safeguarding Children Board. Further details and relevant documents can be found at:



<https://hillingdonsafeguardingpartnership.org.uk/>

3.2. Record keeping

Well-kept records are essential to good child protection practice. Concerns and disclosures should be passed to the DSL by using **Appendix A** or the CPOMS incident reporting system without delay. Records are stored electronically on the CPOMS database and are only accessible by the DSL and DDSL. When pupils pass on to their next school the Headmaster is responsible for transferring the information he judges to be relevant.

3.3. LADO contact details

Initial contact with Hillingdon should be through the Stronger Families Hub directly on 01895 556006

Local Authority	Contact number	Other	LADO
Buckinghamshire: North Bucks Area	01296 395000	Out of hours 01494 675802	Bridget Day 01296 382070
Buckinghamshire: South Bucks Area	01494 475000	Out of hours 01494 675802	
Hillingdon	01895 250010 https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess#ssa	Out of hours 01895 250111	Hannah Ives 07753 431285
Harrow	Children's Access Team Golden Number 0208 9012690	Out of hours 0208 424 0999	Janice Miller 020 8736 6435
Hertfordshire	0300 123 4043		

Hillingdon LADO:

Designated Child Protection Advisor for Education

Contact: Hannah Ives Tel: (01895) 250010/(07753) 431285
hives@hillingdon.gov.uk

Deputy LADO and Lead Child Protection Officer for Schools

Contact: Nicole Diamond Tel: (01895) 250010/(07943) 097366

Hillingdon Stronger Families Hub: Tel: (01895) 556006

strongerfamilieshub@hillingdon.gov.uk

Early Help Assessment Portal

[Children Young People and Families Online Service \(hillingdon.gov.uk\)](http://www.hillingdon.gov.uk/children-young-people-and-families/online-service)

Prevent Contact:

Fiona Gibbs, London Borough of Hillingdon Prevent Lead

Email: f gibbs@hillingdon.gov.uk Tel: 01895 277035 or 07946 714637

DfE helpline for non-emergency advice for staff and governors. Tel 020 7340 7264 and email counter-extremism@education.gsi.gov.uk

For FGM and other issues please contact:



Metropolitan Police Service Ruislip – 0208 7212545 (999 in emergency)
Non-emergency police number – 101

Remember: Anyone can make a referral regarding safeguarding and child protection

4. Training

4.1 DSLs

The Deputy Head (Pastoral) (Mrs J Savage) is the DSL. The Head of Lower School (Miss K Morgan) is the DDSL and also is responsible for safeguarding in the EYFS. The DSL and DDSL receive updated child protection training at least every two years in accordance with locally agreed procedures for Hillingdon Borough (including child protection, inter-agency working and Prevent duties) and match the description given in KCSIE Annex C, page 147. The two yearly training for DSLs should be supplemented with informal updates as required but at least annually. **The main responsibility of the DSL is to manage referrals with social care. They must make prompt contact with children's social care where there are concerns that a child may be in need of help or at risk and/or make contact with the LADO in relation to allegations against someone working in the School. They must make contact with the police if a criminal offence is suspected.**

4.2 All other staff

The Headmaster and all teaching and non-teaching staff are trained by the Hillingdon Safeguarding team or Educare. The Headmaster, members of staff and volunteers in regulated activity have regular child protection training renewed as specified by the LSCB in content and frequency, every three years, and that temporary and voluntary staff are made aware of the arrangements. Regular formal training for staff should be supplemented with informal updates as required but at least annually. All staff are made aware of the DSL and Deputy DSL in the school.

4.3 Training details

The following training has taken place:

- **All staff:** April 2018: Introduction to Safeguarding Children, Andrea Nixon, Hillingdon Borough Council. September 2019: Safeguarding Level 1 Training, Susan-Sidonia Gladish, Hillingdon Borough Council.
- **Teaching staff:** September 2021: all staff read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). September 2021: Child Protection in Education Level 2 (Educare). September 2021: Safeguarding Young People Level 2 (Educare). September 2021: The Prevent Duty (Educare). September 2021: Keeping Children Safe in Education 2021 Questionnaire. September 2021: CPOMS training for all teaching staff.
- **Headmaster:** October 2018: An introduction to Child Sexual Exploitation Level 2 (Educare). September 2019: Child Protection Refresher Level 2 (Educare). March 2019: Online Safety Level 2 (Educare). March 2019: Prevent Duty Level 2 (Educare). September 2020: Safer Recruitment in Education (Educare). September 2021: Child Protection in Education Level 2 (Educare). September 2021: Safeguarding Young People Level 2 (Educare). September 2021: The Prevent Duty (Educare). September 2021: read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). 2021: Keeping Children Safe in Education 2021 Questionnaire.



- **Deputy Head (Pastoral):** April 2019: Online Safety (Educare). September 2019: Child Protection Refresher Level 2. March 2019: The Prevent Duty (Educare). March 2019: Prevent Bullying (Educare). July 2020: Safeguarding Young People (Educare). August 2020: Child Protection Refresher (Educare). July 2020: Safeguarding Children Level 3 Designated Lead (E-magination Training). August 2020: Mental Wellbeing in Children and Young People - Level 2 (Educare). September 2020: Safer Recruitment in Education (Educare). September 2021: Safeguarding Young People Level 2 (Educare). September 2021: The Prevent Duty (Educare). September 2021: read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). 2021: Keeping Children Safe in Education 2021 Questionnaire. October 2021: Mandatory Exploitation Training for DSLs (Hillingdon - Hannah Ives & Phil Skidmore)
- **Head of Lower School:** April 2018: Safeguarding refresher Hillingdon LADO. July 2018: Child protection in Education (Educare) July 2018: Child protection refresher (online). Online Safety (Educare 2019), July 2018: Safer recruitment in Education (Educare). July 2018: Prevent duty (Educare). July 2018: Online safety (educare). March 2019: Working Together to Safeguard Children Level 3 (Refresher Hillingdon Borough). January 2019: Prevent Bullying (Educare). February 2019: Prevent Duty (Educare). October 2019: Operation Encompass, Hillingdon Borough. September 2019: Safeguarding Level 1 Training. November 2019: Child Protection Refresher (Educare). January 2020: Domestic Abuse - Children And Young People (Educare). January 2020: supporting staff with wellbeing (Educare). Jan 2020: Mental wellbeing in Children (Educare). March 2021: Working Together to Safeguard Children Level 3 Refresher (Hillingdon). September 2021: Safeguarding Young People Level 2 (Educare). September 2021: The Prevent Duty (Educare). September 2021: read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). 2021: Keeping Children Safe in Education 2021 Questionnaire. Oct 2021: Safer Recruitment in Education (Educare). Nov 2021: Safer Recruitment in Education (Educare).
- **All new staff:** Induction training of any new staff, including temporary staff, to St John's will include the safeguarding policy (alongside the Guide to Professional conduct/ whistleblowing/ Anti-Bullying/ E-Safety and Network/Staff Mobile Device/Behaviour policy covering all situations relevant to the school), the identity and function of the DSL(s) and a copy of Part 1 of KCSIE (including Annex B). Induction training also includes the school's safeguarding response to children who go missing from education. September 2021: Safeguarding Young People Level 2 (Educare). September 2021: The Prevent Duty (Educare). September 2021: read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). 2021: Keeping Children Safe in Education 2021 Questionnaire.
- **All non-teaching support staff** have had additional safeguarding refresher training, September 2019: Safeguarding Level 1 Training, Susan-Sidonia Gladish, Hillingdon Borough Council. September 2021: Safeguarding Level 1, Hannah Ives, Child Protection Adviser to School's and Deputy LADO (LBH). September 2021: read and understood Annex B of the new 2021 guidelines on Keeping Children Safe in Education.
- **Governors: P. MacDougall** June 2019: The Prevent Duty (Educare). June 2019: Child Protection Refresher (Educare). June 2019: Prevent Bullying (Educare). June 2019: Safer Recruitment in Education (Educare). January 2021: Governors Safeguarding & LADO Training (Hannah Ives at Hillingdon). September 2021: read and understood the new 2021 guidelines on Keeping Children Safe in Education Part 1 (Including Annex B). February 2022: Safeguarding Children Level 3 Designated Lead (E-magination Training).



5 Evaluation/Monitoring of this policy

5.1 **Pastoral Committee**

This is carried out annually by the Pastoral Committee in the Autumn Term.

5.2 **Nominated governor**

The nominated governor responsible for safeguarding undertakes an annual review of the school's safeguarding policy and procedures including checking the efficiency with which the related duties have been discharged. This review is reported to the full governing body in November each year who will ratify the policy and this will be signed off by the Chair of Governors.

6 Further information and useful documents

6.1 **DSLs have the following or they can be downloaded**

- Keeping Children Safe in Education [KCSIE 2021](#)
- The London Procedures '5th edition' <http://www.londoncp.co.uk/index.html>
- [Working Together to Safeguard Children](#)
- [What to do if you're worried a child is being abused](#)

7 Code of conduct for Staff contact with pupils

Introduction:

Education professionals recognise that they may sometimes be the victims of false or malicious allegations of child abuse by pupils or their parents. All allegations of child abuse must be taken seriously. In order to minimise the risk of accusations being made against St John's staff it is important that we all follow this code. It should also be read in conjunction with the staff **Guide to Professional Conduct Policy**.

THE CODE

7.1 **General**

We should take care that our relationships with pupils reflect the age and maturity of the pupils. It will be particularly important to ensure that all aspects of demeanour, language and attitudes - however conveyed - do not give rise to misunderstandings. Ambiguous or ambivalent comment and conduct, in particular, should be avoided. We should ensure that we are open, responsive and non-judgmental to concerns made by pupils and staff at all times.

7.2 **Physical Contact**

Physical contact may be misconstrued by a pupil, parent or observer. We must not make gratuitous physical contact with pupils and should avoid attributing "touching" to our teaching style as a way of relating to pupils. There will be occasions when physical contact will be acceptable. In general these will fall into one of three categories:

7.3 **Action to prevent harm or injury to the pupil or to others**

If it is necessary to prevent a pupil causing injury to him/herself or to others the use of minimum force and contact necessary to prevent harm or injury is acceptable and defensible. Such incidents must always be reported to parents the same day or as soon as is reasonably practicable.

7.4 **Comforting a pupil in distress**

There is no easy definition of what is acceptable since much will depend on the circumstances, the age of the pupil, the extent and cause of the distress and the alternative means of providing comfort. We



need to use our professional judgement and discretion in relation to these factors. We should consider how others might perceive the action, even if no one else is present, and ensure that it does not develop into unnecessary contact. Particular care must be taken in instances, which involve the same pupil over a period of time.

7.5 Unavoidable contact

This is a particularly sensitive issue in subjects such as Physical Education, Music and Drama. All teachers must be alert to the possibilities of misinterpreting any contact, especially in instances such as one-to-one tuition in music. To avoid such misunderstanding all planned contact must be demonstrably unavoidable. It may be, for example, that alternative methods involving demonstrations by a particularly competent pupil are more appropriate.

7.6 Corporal Punishment

Any form of physical punishment is prohibited under disciplinary procedures and potentially actionable in law. This also applies to any form of physical response to misbehaviour.

7.7 Private meetings

Private meetings, by their very nature, provide opportunities for pupils to make malicious allegations. We must therefore recognise this possibility and plan such meetings accordingly. It is advisable to choose to meet in rooms where the door can be left open and not in private offices. Under no circumstances should meetings with individual pupils be arranged off the school premises. This includes the transporting of individual children in private cars. In many cases it will be advisable for another adult to be present or in a position to minimise risk during any interview.

7.8 First Aid

The existence of any life threatening or serious condition will determine the suitability and necessity of physical contact. In the absence of such justification employees who administer first aid should ensure that, wherever possible, other children or another adult can be present if there is any doubt over the possibility of any physical contact being misconstrued.

7.9 Teaching materials

The use of books, videos and films of an explicit or sensitive nature, particularly in relation to language, violence or sexual behaviour must be given careful consideration to ensure that its selection is not subsequently misinterpreted. There should always, therefore, be a clear link with the targets of the teacher's programme.

7.10 Reporting Incidents

Teachers should report any concerns they may have following any incident where s/he feels that his/her actions may have been misinterpreted. This report should be made to the Headmaster as soon as possible after the incident and should include as an immediate follow-up the preparation of a written note of the incident, a copy of which should be given to the Headmaster.

7.11 Personal letters, mobile phones, photography and online communication

This advice must be read in conjunction with the [**Staff Mobile Device**](#) policy. It is rarely appropriate for teachers to write personal notes or letters, to communicate by mobile phone or to send an email, to individual pupils. This advice is not intended to stop the use of internal e-mail at St John's for the provision and submission of work, advice over aspects of subjects being covered or other professional matters. It is never appropriate to give pupils your personal mobile phone number. Except with specific permission from the SLT, staff may not use their own cameras, phones or other equipment to take pictures in school or at school events. A school camera is available for this purpose. If staff go out



on a trip and, with permission, take pictures on their phone then our policy is that these are then uploaded to our server and deleted from their own devices as soon as is reasonably possible. ‘Mobile free’ areas must be observed at all times. Under no circumstances is any member of staff permitted to take images or make recordings of EYFS pupils on a personal mobile device.

7.12 Staff contact with pupils

In order to minimise the risk of accusations being made against staff, governors will ensure, through the Headmaster, that all staff are aware of the following guidance taken from KCSIE – Sept 2021.

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work in an open and transparent way (especially when working with individual pupils e.g. one-to-one coaching, sports coaching, conveying a pupil by car). Staff should not allow pupils to visit their place of residence
- Staff must not engage in inappropriate electronic communication with a pupil
- Staff should discuss and /or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise for concern
- Records will be made of any such incidents and of decisions made

7.13 FOOTNOTE

The purpose of this section is to promote the highest standards of care for young people and to protect teachers and others from the potentially devastating consequences of false allegations. It is an unfortunate fact that society is less trusting and that, on occasions, cases have come to light, which have justified the increased level of mistrust. All teachers are urged to consider how they can safeguard their own position in the light of this advice without giving up important personal principles of care and trust. Whenever doubt exists any teacher should seek the advice of his/her Headmaster or an experienced colleague. As a school, St John’s should have a culture of safety and of raising concerns surrounding safeguarding issues. We must have a culture of valuing staff and of reflective practice. Through the school’s **Whistleblowing Policy** (appendix C) there are procedures for reporting and handling concerns, including about poor or unsafe practice and potential failures in the school’s safeguarding regime, provision for mediation and dispute resolution where necessary.

8 What is abuse and neglect?

8.1 Definition of ‘Significant Harm’

The Children Act 1989 defines ‘harm’ as “ill-treatment or the impairment of health or development”. ‘Development’ means physical, intellectual, emotional, social or behavioural development; ‘health’ means physical or mental health; and ‘ill-treatment’ includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes “impairment suffered by hearing or seeing the ill-treatment of another”.

According to [Working Together 2018](#), significant harm refers to “the threshold that justifies compulsory intervention in family life in the best interests of children, and gives LAs a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm”.

The legislation, however, does not define the line between ‘harm’ and ‘significant harm’. As a practitioner, you should give ‘significant’ its ordinary meaning (i.e. considerable, noteworthy or important). The child’s particular characteristics also need to be taken into consideration. For example,



a child left home alone at the age of 3 could be at risk of significant harm, whereas a child aged 13 years may be less likely so. The test will be subjective to the particular circumstances.

Whether the harm is significant is determined by comparing the child's health and development with what could reasonably be expected from a similar child. For example, if a child is failing to meet developmental or physical milestones, it is necessary to determine whether this is the result of a lack of "good enough" parenting. There is no clearly defined criteria to judge whether harm meets the threshold of 'significant'—it can be the result of a traumatic event or a compilation of acute and long-standing events. As highlighted in Working Together, "Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm."

Working Together lists the following as factors to consider in understanding and identifying significant harm:

- The nature of harm, in terms of maltreatment or failure to provide adequate care;
- The impact on the child's health and development;
- The child's development within the context of their family and wider environment;
- Any special needs, such as a medical condition, communication impairment or disability, that may affect the child's development and care within the family;
- The capacity of parents to meet adequately the child's needs; and
- The wider and environmental family context.

Abuse and neglect are forms 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 a stranger. They may be abused by an adult or adults, or another child or children. For children with SEN and Disabilities an awareness of mood, behaviour and injury abuse will also be taken into account. **At St John's we recognise the particular vulnerabilities of children with special educational needs and/or disabilities.**

8.2 Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families.

8.3 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise inflicting 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 (Fabricated/induced illness FII).



8.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment 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 include not giving the child opportunities to express their view, 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 the child's development capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve more 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, though it may occur alone.

8.5 Sexual Abuse including Child Sexual Exploitation

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex), or non-penetrative acts, such as masturbation, kissing, rubbing and touching outside clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images 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) or for the purpose of child trafficking. Sex abuse of children by children. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.

Whilst we are a boy's school, we must be vigilant to the possibility of Female Genital Mutilation (FGM) occurring in families at St John's. The risk factors associated with FGM include:

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

As of October 2015 it is now mandatory for teachers to report to the police where they discover an act of FGM which appears to have been carried out. The contact details for the Metropolitan Police Service Northwood are Telephone: 01923 828212

Child Sexual Exploitation



The definition of child sexual exploitation is as follows:

Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity, whilst age maybe the most obvious this power imbalance can also be due to a range of other factors, including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups , males of females, and children or adults. The abuse can be a one off occurrence or series of incidents over time and range from opportunistic to complex organised abuse. It can involve force or enticement 'based methods of compliance and may or may not be accompanied by violence or threats of violence. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. DfE Child Sexual Exploitation (February 2017).

Child Sexual Exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children or young people may be tricked into believing they are in a loving consensual relationship. Child sexual exploitation does not always involve physical contact and can happen wholly online or technology may be used to facilitate offline abuse. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Warning signs can easily be mistaken for 'normal' teenage behaviour. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who take part in consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- Children who regularly miss school or education or do not take part in education;
- Be involved in abusive relationships, intimidated and fearful of certain people or situations;
- Forced marriage



- County lines
- Hang out with groups of older people, or antisocial groups;
- Get involved in gangs, gang fights, gang membership, honour based violence
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country

(Further advice is available at www.nspcc.org.uk and the government document '[What to do if you suspect a child is being sexually exploited](#)')

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. Both child sexual exploitation and child criminal exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or to deceive a child into sexual or criminal activity.

8.6 Neglect

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

8.7 Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence



can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Domestic abuse can take many forms and includes, but is not limited to:

Physical - Assault, punching, kicking, hitting, forced imprisonment, biting, strangling, burning, dragging, using weapons, throwing objects

Sexual - Rape, sexual assault, forced prostitution, degradation, using objects, forced to watch or act in pornography

Psychological - Verbal or emotional abuse, threats to kill, blaming, mind games, criticism, accusations, jealousy and obsessive behaviours, manipulation, sleep deprivation

Financial - Preventing a person from getting or keeping a job, taking money, not permitting access to or withholding family income

Isolation - Not being allowed to see others, to see who you want, denied any form of contact with family or friends and any other support networks

Domestic abuse is **never** acceptable.

How does it affect children?

Children who witness domestic abuse are being **emotionally abused**.

In the majority of reported domestic abuse incidents, children have either been present in the same or a nearby room.

Children who witness, intervene or hear incidents are affected in many ways, even after a short time.

Short-term effects:

- Anxiety or depression
- Feeling frightened
- Becoming withdrawn
- Bed wetting
- Running away
- Aggressiveness or behavioural difficulties
- Problems with school, poor concentration
- Difficulty sleeping, emotional turmoil
- Eating disorders or alcohol or drug misuse

Long-term effects

- Lack of respect for the parent
- Loss of self confidence
- An inability to trust and form relationships
- Becoming overprotective or feeling responsible for the parent
- Feeling a 'loss of childhood'
- Problems at school, low education attainment
- Running away



Operation Encompass (see Appendix G)

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass website](#).

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge](#) what is domestic violence/effects of domestic violence on children
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

8.8 Peer on Peer (Child on Child) Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse, which includes vulnerable pupils with SEND. [KCSIE 2021](#) Part 1 Peer on peer abuse Page 15 Paragraphs 46-50. This can be very subtle and staff should be aware of problems that can arise between older and younger pupils or pupils of the same age. And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. Any allegations of peer-on-peer abuse will be recorded through the School's CPOMS database and all serious incidents will be entered onto a file via the Designated Safeguarding Lead and kept secure in their office. All peer-on-peer allegations will be investigated following our Anti-Bullying and Behaviour Policies recommended procedure when an incident occurs:

- [Anti-Bullying Policy](#)
- [Behaviour Policy](#)



All staff should understand that even if there are no reports at St John's it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to the DSL or Deputy DSL. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. Where the School receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined in this policy. The School will listen and work with the young person, parents/carers and any multi agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded and appropriate referrals made if required. There is a zero-tolerance approach at St John's to peer on peer abuse.

Where an instance of peer-on-peer abuse has been disclosed the School's position is that all the children involved be treated as being 'at risk' whether victim or perpetrator. Support for the victim is important and is covered in the Anti-Bullying policy.

All serious cases of bullying will be referred to the Headmaster or Deputy Head (Pastoral) who will consult immediately with local external agencies, before further action is taken to obtain advice on whether a child is or might be at risk of significant harm. (Refer to the Anti-Bullying Policy). with this support. In fulfilling its responsibilities the School will take sufficient account of the nature and age range in the provisions made for safeguarding, making sure that at all times the victims receive the appropriate support through the pastoral system and if the need arises then the use of external agencies to assist.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

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



or humiliation used as a way of initiating a person into a group and may also include an online element)

8.9 Online Safety

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place. Additional information to support governing bodies and proprietors to keep their children safe online (including when they are online at home) is provided in Annex D pages 150-152 of KCSIE 2021.

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

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.

This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) was made compulsory from September 2020. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. The statutory guidance can be found here:

Statutory guidance: relationships education relationships and sex education (RSE) and health education. Colleges may cover relevant issues through tutorials. The following resources may help schools and colleges:

- DfE advice for schools:

Teaching online safety in schools

- [UK Council for Internet Safety \(UKCIS\)27 guidance: Education for a connected-world](#)
- [National Crime Agency's CEOP education programme: Thinkuknow](#)
- [Public Health England: Rise Above](#)

8.10 Other types of Abuse and Neglect

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory



labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Cybercrime

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

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

If there are concerns about a child in this area, the DSL (or DDSL), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, '[When to call the Police](#)' and National Cyber Security Centre - ncsc.gov.uk School Safeguarding Procedures

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Boys are regularly reminded about all aspects of safety both in and outside of the school community. For example, in addition to discussions about people that they do not know, before all school trips staff remind the children that if they become lost, they should seek out a staff member at the venue for help. Further information is available at: [www.actionagainstabduction.org](#) and [www.clevernevergoes.org](#).

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use



of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff are aware of our unauthorised absence and children missing from education procedures, and are familiar with our Admissions, Attendance and Children Missing from Education Policy.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children with special educational needs and disabilities or physical health issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Our governing body ensures that our child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Our Governing body ensures that our child protection policy reflects the above and to address these additional challenges, we will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the [DFE's SEND Code of Practice 0 to 25 and Supporting Pupils at School with Medical Conditions SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/send-code-of-practice-0-to-25-and-supporting-pupils-at-school-with-medical-conditions-send-code-of-practice-0-to-25-years)

9 Symptoms and signs of abuse

The following behavioural signs do not necessarily mean that any form of abuse has taken place but they may possibly indicate a problem:



9.1 Signs of Physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries, which occur to the body in places which are not normally exposed to falls, rough games etc
- Injuries which have not received medical attention
- Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc
- Reluctant to change for or participate in games or swimming
- Repeated urinary infection or unexplained stomach pains
- Bruises, burns, bites, fractures, etc. which do not have an accidental explanation
- Cuts, scratches, substance misuse, county lines

9.2 Signs of Emotional abuse

- Changes or regression in mood or behaviour; particularly where a child withdraws or becomes clingy. Also depression / aggression, extreme anxiety
- Nervousness
- Anxiety due to perceived pressure of workload
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Inappropriate relationships with peers or adults
- Attention seeking behaviour
- Persistent tiredness
- Running away / stealing / lying
- Criminal exploitation

9.3 Signs of Sexual abuse

- Any allegation made by a child concerning sexual abuse
- Child with excessive preoccupation with sexual matters, and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Sudden changes in behaviour or school performance
- Tendency to cling, need reassurance
- Tendency to cry easily
- Apparent secrecy
- Anorexia or bulimia
- Phobias, panic attacks
- Distrust of a familiar adult

Government guidance: [Sexual Violence and Sexual harrassment between children in schools and colleges](#)

9.4 Signs of Neglect

- Constant hunger
- Poor personal hygiene
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour



- No social relationships
- Running away
- Compulsive stealing or scavenging
- Homelessness [Homelessness code of guidance for local authorities](#)

Whilst these lists are there for guidance, the NSPCC has useful information on signs, symptoms and effects of child abuse and neglect. These can be found here:

<http://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

9.5 **Racial, cultural and religious patterns**

Crucial to any assessment, is the knowledge and sensitivity to racial, cultural and religious patterns. While it is important to respect these practices, it is important to remember that all children have basic human rights. Differences in child rearing do not justify Child Abuse.

In cases where pupils run away or go missing the school 'Missing Child Policy' should be followed. After the pupil has been found the follow up should include a consideration of the reasons for the pupil going missing, and if there is a safeguarding concern the DSL should be informed.

To help ensure that pupils do not go missing from education in the long term the following steps will be taken. Where a pupil's name is going to be deleted from the admission register the School will inform the local authority in which pupil resides. This will be done when a pupil has been taken out of school to be home educated, when the family has apparently moved away, when the pupil has been certified as medically unfit to attend school, when the pupil is in custody for more than four months or when he has been permanently excluded. In cases where a pupil has had ten days of unauthorised absence (other than for reasons of sickness or leave of absence), failed to attend regularly or his name is to be deleted from the school register where the next school is not known, a report will also be made to local authority in which the child resides. The Deputy Head, Pastoral will make such reports to the local authority in line with the [Children Missing Education](#) statutory guidance for local authorities (September 2016). Further information regarding this issue can be found in **Annex B of KCSIE Sept 2021 Page 124**.

9.6 **Mental Health**

Please refer to the Positive Mental Health and Well-Being Policy [Mental Health Policy](#)

10. **Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.



Under section 26 of the Counter-Terrorism and Security Act (2015), as a school we now have to have “due regard to the need to prevent people from being drawn into terrorism” - this is a legal obligation. This duty is known as the Prevent duty. In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools’ and childcare providers’ wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. [Prevent Duty Guidance:](#) for England and Wales

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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In all cases a member of staff will inform the Designated Safeguarding Lead of their concerns about a child, however trivial their concern may be. The DSL will make a decision on the level of risk to the child in order to identify the most appropriate referral. This could include Channel or Children’s Social Care. Advice from the local authority will always be taken first but if the child is considered to be at significant harm then the referral will be made without consent from the parents or child.

It is important that as staff we are aware of the vulnerabilities of the children and know how to respond, taking into consideration emotional, verbal and physical changes that may have happened. Staff should follow the Notice (spot the signs), Check (check the facts), and Share (share what you know with the DSL) protocol.

The London Borough of Hillingdon is considered a low risk borough with regards to radicalisation and in that context St John’s should be considered to be low risk also. With a very ethnically and religiously diverse school with no single ethnic/religious group dominating the likelihood of radicalisation would be considered low. This coupled with the work the school does on British values serves to promote ethnic and religious tolerance. The DSL will monitor the ongoing situation along government guidelines. In the case of visiting speakers the DSL will make an assessment of the speaker’s background and the content of the topics they are delivering. At all times they will be accompanied by a member of staff.

We ensure that children are safe from terrorist and extremist material when accessing the internet in school as suitable filtering is in place. We regularly teach pupils about British Values and online safety through the assembly programme and PSHE lessons.

As part of wider safeguarding responsibilities school staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Pupils accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools or settings.



- Pupils voicing opinions drawn from extremist ideologies and narratives. Attempts to impose extremist views or practices on others.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equal opportunities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Anti-Western or Anti-British views.

The DfE dedicated helpline can be used for support and advice at 020 7340 7264 or via email at counter-extremism@education.gsi.gov.uk

Further information on topics such as children missing in education, female genital mutilation, child sexual exploitation, radicalisation, so-called honour based violence and forced marriage can be found on Annex B of the [KCSIE September 2021](#).

Appendix A: St John's School Safeguarding Incident Report

NAME OF PERSON COMPLETING THIS FORM	
--	--

This report should be completed IMMEDIATELY following any incident which raises concern about possible child abuse (e.g. on observation of an unexplained/suspicious injury or following something said by a child which causes concern). It should be completed by the member of staff most directly involved. Care must be taken to record the information accurately and confidentially. This form must be passed on AS SOON AS POSSIBLE to the school's Designated Safeguarding Lead and a decision made about what should happen next.



Alternatively an incident can be reported via CPOMS <https://stjohnsmerchanttaylors.cpoms.net/> using your individual login details.

DETAILS OF INCIDENT	
Name of child	
Date of birth	
Place where incident/observation of injury/disclosure occurred	
Adults/children present	
Date	
Time	

Record here EXACTLY what you saw or heard, including actual site of any injury (e.g. upper right arm), size/colour of bruising etc. or an exact record (as far as possible) of anything said to you by the child. Record also any relevant comments made by yourself. Attach an additional sheet of paper if required.

Signature and Date

Reported to the Designated Teacher:	at:	(time)	on:	(date)
Action taken/ No further action taken: (please specify)				
Signed (person reporting incident)				
Signed (Designated Teacher)				

This record should be given to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead who will keep it securely in their office.

Appendix B: Confirmation of having read and understood Part 1 and Annex B of the Keeping Children Safe in Education – Sept 2021 documentation. Support staff should confirm that they have read Annex B of the Keeping Children Safe in Education - Sept 2021 documentation

In order to demonstrate understanding of the new part 1 and/or Annex B [KCSIE 2021](#) you should be able to answer the following questions:



- ✓ Who is the designated safeguarding lead at the school?
- ✓ What would you do if you had a concern about a child?
- ✓ What would you do if you were worried about the behaviour of a colleague?
- ✓ What would you do if a child told you that they were being abused or neglected?

This is to confirm that I have read and understood Part 1 and/or Annex B of the Keeping Children safe in Education (September 2021) document as required by the Department of Education.

Name:	
Signed:	
Date:	

Please return this sheet signed and dated to Jessica Savage (Designated Safeguarding Lead)

Appendix C: Whistleblowing Policy

Introduction

At St John's School we are committed to the highest possible standards of openness, probity and accountability and we encourage staff and others working with us to raise any concerns about any aspect of our work to come forward and voice those concerns. In some instances, concerns may need to be expressed on a confidential basis.



Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior leadership and/or relevant agencies. This procedure encourages staff to raise serious concerns, without fear of reprisal or victimisation, internally within school rather than overlooking a problem or raising the matter outside.

It applies to all staff, both teaching and non-teaching.

It is recognised that whistle blowing may engender feelings of disloyalty to colleagues or that staff may fear harassment or victimisation. These feelings, however natural, must never result in the behaviour that is causing concern, continuing.

Don't think what if I'm wrong – think what if I'm right

Other Complaints Procedures

This procedure is separate from the school Complaints Procedures and other statutory reporting procedures. Safeguarding issues should be reported according to the specific guidelines laid out in that policy.

Any investigation into allegations of potential malpractice under this procedure will not influence or be influenced by any disciplinary or redundancy procedures that already affect an individual.

Behaviour that should cause concern:-

- Conduct which is, has been or is likely to be an offence or breach of law.
- Conduct that has occurred, is occurring, or is likely to occur; the result of which is that the school fails to comply with a legal obligation. For example unauthorised use of public funds, possible fraud and corruption, verbal, sexual or physical abuse, or other unethical conduct.
- Discrimination of any kind.
- Disclosures related to past, current or likely miscarriages of justice.
- Past, current or likely health and safety risks, including risks to the public as well as other employees.
- Waste/frivolous expenditure.
- Past, current or likely damage to the environment.

Reasons for whistle-blowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

What stops people from whistle-blowing

- Starting a chain of events which spirals.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.



How to raise a concern

- You should voice your concerns as soon as you feel you can with a member of SLT.
- Try to pinpoint exactly what practice is concerning you and why.
- If your concern is about a member of the SLT then approach the Headmaster. If your concern is about the Headmaster, or you feel you need to take it to someone outside the school, contact the Local Education Officer for your area, or the Chair of Governors.
- Make sure you get a satisfactory response in writing – don't let matters rest.
- Ideally you should put your concerns in writing, outlining the background and history, giving names, dates and places where you can.
- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

What happens next?

- You should be given information on the nature and progress of any enquiries.
- Your employer has a responsibility to protect you from harassment or victimisation.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- Malicious allegations may be considered as a disciplinary offence.

Confidentiality

All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if this is your wish. However, in certain cases, it may not be possible to maintain confidentiality if you are required to come forward as a witness.

Anonymous Allegations

Whenever possible you should put your name to your allegation as concerns expressed anonymously are much less powerful than those which are attributed to a named individual. However, anonymous allegations will be considered and investigated at the school's discretion.

In exercising the discretion, the factors to be taken into account would include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Self-reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with the Headmaster so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.



Further advice, support and contact details

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from Headmaster, Sean Robinson, Interim Chair of Governors, James Fowler and governor Kate Fenwick.

Area Education Welfare: 01895 55 6000

Interim Chair of Governors:- Mr J Fowler jfowler@st-johns.org.uk

Appendix D: Role of Designated Safeguarding Lead

Governing bodies, proprietors and management committees should appoint an appropriate **senior member** of staff, from the school or college **leadership team**, to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection which includes online safety. (**KCSIE Annex C**). This should be explicit in the role-holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.



Work with others

The designated safeguarding lead is expected to:

- liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years and incorporate online safety. The designated safeguarding lead should undertake Prevent awareness training.

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

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college’s child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- have oversight of online safety throughout the School and contribute to staff development at least annually;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- All staff are to be trained to manage and report child on child sexual violence or harrassment

Raise Awareness

The designated safeguarding lead should:



- ensure the School child protection policies are known, understood and used appropriately;
- ensure the School child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child Protection File

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely both in paper form and through CPOMS. Records should include:

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

When children leave the School ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

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

It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

During the Covid-19 Pandemic the DSL and /or Deputy DSL remain available in person during school hours.



Appendix E: Prevent referrals process – LB Hillingdon

On 25th May 2020, a new pilot scheme was launched by the Metropolitan Police to streamline the way statutory agencies can report a Prevent concern to the police and Multi-Agency Safeguarding Hub.

The new National Prevent referral form is below, which from 25th May 2020 is the only way to submit a concern that someone may be vulnerable to radicalisation or extremism.

To assist this new process, we have created a “Front Door for Prevent” to avoid agencies having to duplicate information on separate referrals.

The DSL will email preventreferrals@met.pnn.police.uk which will share the form with both the police and MASH to allow the safeguarding concerns to be assessed alongside any police risk.

If you have any queries or would like some support prior to submitting the referral form then you can contact the Local Authority Prevent Lead, Fiona Gibbs. Email: fgibbs@hillingdon.gov.uk Tel: 07946714637



Appendix F: Prevent NRF

REFERRAL PROCESS	
<p>By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment. Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities.</p> <p>Once you have completed this form, please email it to: preventreferrals@met.pnn.police.uk</p> <p>If you have any questions whilst filling in the form, please call: Hillingdon LA Prevent Team 07946714637</p>	
INDIVIDUAL'S BIOGRAPHICAL & CONTACT DETAILS	
Forename(s):	First Name(s)
Surname:	Last Name
Date of Birth (DD/MM/YYYY):	D.O.B.
Approx. Age (if DoB unknown):	Please Enter
Gender:	Please Describe
Known Address(es):	Identify which address is the Individual's current residence
Nationality / Citizenship:	Stated nationality / citizenship documentation (if any)
Immigration / Asylum Status:	Immigration status? Refugee status? Asylum claimant? Please describe.
Primary Language:	Does the Individual speak / understand English? What is the Individual's first language?



Contact Number(s):	Telephone Number(s)
Email Address(es):	Email Address(es)
Any Other Family Details:	Family makeup? Who lives with the Individual? Anything relevant.

DESCRIBE CONCERNS	In as much detail as possible, please describe the specific concern(s) relevant to Prevent.
<p>Please Describe</p> <p>FOR EXAMPLE:</p> <ul style="list-style-type: none"> • How / why did the Individual come to your organisation's notice in this instance? • Does it involve a specific event? What happened? Is it a combination of factors? Describe them. • Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How? • Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact? • Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information? • Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly? • Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider <i>any</i> extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures. • Please describe any other concerns you may have that are not mentioned here. 	
COMPLEX NEEDS	Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?
<p>Please Describe</p>	



FOR EXAMPLE:

- **Victim of crime, abuse or bullying.**
- **Work, financial or housing problems.**
- **Citizenship, asylum or immigration issues.**
- **Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.**
- **On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.**
- **Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.**
- **Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).**
- **Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.**

OTHER INFORMATION	Please provide any further information you think may be relevant, e.g. social media details, military service number, other agencies or professionals working with the Individual, etc..
Please Describe	



Appendix G: Operation Encompass



OUR KEY ADULT IS:

Mrs J Savage (DSL Deputy Head Pastoral)

Operation Encompass Safeguarding Statement

Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse. Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.

Once a Key Adult (DSL) has attended an Operation Encompass briefing they will cascade the principles of Operation Encompass to all DDSL's. Our parents are fully aware that we are an Operation Encompass school.

The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.

We are aware that we must do nothing that puts the child/ren or the non abusing adult at risk. The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports. The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.



Appendix H: Low Level Concerns Policy

Low Level Concerns Policy

Review cycle: Annually

Last Review Date: Jan 2022

Next Review Date: Jan 2023

Staff responsible: Deputy Head (Pastoral)

Governor responsible: Mr P MacDougall, Mr J Fowler, Board

It must be read in conjunction with the Safeguarding and Child Protection Policy and other relevant St John's policies.

THIS POLICY IS APPLICABLE TO ALL PUPILS, INCLUDING THOSE IN THE EYFS



Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Child Protection and Safeguarding policy are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – “Keeping Children Safe in Education” Part 4, Section 2.

Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school’s Guide to Professional Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door using inappropriate sexualised, intimidating or offensive language
- one-to-one situations
- Use of car
- supervision of changing rooms
- supervision of shower areas
- gifts given or received
- dealing with pupil infatuation
- social contact out of work
- home visits e.g. for tuition

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.



It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Staff Behaviour and Code of Conduct), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Head. However, it is never too late to share a low-level concern if this has not already happened.

Where the Head is not available, the information will be reported to the designated safeguarding lead (or deputy)

Low-level concerns about the Designated Safeguarding Lead will be reported to the Head and those about the Head will be reported to the Chair of Governors.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head of the details as soon as possible.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- Is consistent with the school's Guide to Professional Conduct so no further action will be required
- Constitutes a low-level concern so no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day



- management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken.
- Is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Bursar.

Allegations procedure within the [Safeguarding Policy](#) and [Disciplinary Procedure](#) will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Bursar. In this case the school's Guide to Professional Conduct [Disciplinary Procedure](#) will be followed.

When considered with any other low-level concerns that have previously be made, records will be made of:

- All internal conversations including any relevant witnesses
- All external conversations, e.g. with the LADO
- The decision and the rationale for it
- Any action taken

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.



Exploring wider cultural issues

The school will consider if there are any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of occurrence.

What is the role of the Governors?

The Head will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.