

## Safeguarding Policy

**Responsible person:** Matt Farrah (Designated Safeguarding Lead)

**Review Cycle:** Annual

**Date of issue:** September 2024

**Next Review Date:** September 2025

Burlington House School Tooting is owned and operated by **Cavendish Education**.

### General Introduction:

This policy is one of a series of school policies that, taken together, are designed to form a comprehensive statement of the school's aspiration to provide an outstanding education for each of its students and of the mechanisms and procedures in place to achieve this. Accordingly, this policy should be read alongside these policies. In particular it should be read in conjunction with the policies covering equality and diversity, Health and Safety, safeguarding and child protection.

All of these policies have been written, not simply to meet statutory and other requirements, but to enable and evidence the work that the whole school is undertaking to ensure the implementation of its core values: that 'all children can achieve'.

While this current policy document may be referred to elsewhere in Burlington House School Tooting documentation, including particulars of employment, it is non-contractual.

In the school's policies, unless the specific context requires otherwise, the word "parent" is used in terms of Section 576 of the [Education Act 1996](#), which states that a 'parent', in relation to a child or young person, includes any person who is not a biological parent but who has parental responsibility, or who has care of the child. Department for Education guidance [Understanding and dealing with issues relating to parental responsibility September 2023](#) considers a 'parent' to include:

- all biological parents, whether they are married or not
- any person who, although not a biological parent, has parental responsibility for a child or young person - this could be an adoptive parent, a step-parent, guardian or other relative
- any person who, although not a biological parent and does not have parental responsibility, has care of a child or young person

A person typically has care of a child or young person if they are the person with whom the child lives, either full or part time and who looks after the child, irrespective of what their biological or legal relationship is with the child.

The school employs the services of the following consulting companies to ensure regulatory compliance and the implementation of best practice:

- Peninsula BrightHR
- Peninsula BrightSafe (Health and Safety)



**BURLINGTON**  
HOUSE SCHOOL

- Atlantic Data (DBS)
- Educare (online CPD)
- SchoolPro (data protection)
- Marsh Commercial (insurance)

Where this policy refers to 'employees', the term refers to any individual that is classified as an employee or a worker, working with and on behalf of the school (including volunteers and contractors).

Burlington House School Tooting is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, pupils and visitors to share this commitment.

All outcomes generated by this document must take account of and seek to contribute to safeguarding and promoting the welfare of children and young people at Burlington House School.

The policy documents of Burlington House School Tooting are revised and published periodically in good faith. They are inevitably subject to revision. On occasions a significant revision, although promulgated in school separately, may have to take effect between the re-publication of a set of policy documents. Care should therefore be taken to ensure, by consultation with the Senior Leadership Team, that the details of any policy document are still effectively current at a particular moment.

## **THE WELFARE, HEALTH AND SAFETY OF PUPILS - STANDARD 3**

### **INTRODUCTION**

This policy has been developed to promote and maintain a safer culture, in accordance with the principles established by: [KCSIE 2024](#)

KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018)

KCSIE also refers to the non statutory advice for practitioners: What to do if you are worried about a child being abused March 2015

Working Together to Safeguard Children (December 2023)

WT refers to the non statutory but important advice: Information Sharing (2018)

Prevent Duty Guidance: for England and Wales (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and briefing note:

The Prevent duty: Departmental advice for schools and childminders (June 2015)

The Use of Social Media for On-line Radicalisation (July 2015)



### Teaching online safety in school (June 2019)

What is the status of this guidance This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18. About this guidance We use the terms "must" and "should" throughout the guidance. We use the term "must" when the person in question is legally required to do something and "should" when the advice set out should be followed unless there is good reason not to. The guidance should be read alongside:

- statutory guidance Working Together to Safeguard Children, and
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners Unless otherwise specified:
- 'school' means: all schools whether maintained, non-maintained or independent schools (including academies, free schools and alternative provision academies), maintained nursery schools and pupil referral units.
- 'college' means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector.<sup>2</sup> College also means providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended)<sup>3</sup>: 16-19 Academies, Special Post-16 institutions and

### AIMS OF THIS POLICY

- The School is committed to acting in the best interests of the child and to create a culture of safety, equality and protection
- To follow and adhere to the procedures of the Lambeth Local Safeguarding Children's Board (or local safeguarding partners)
- To support the child's development in ways that will foster security, confidence and resilience and to be explicit to all stakeholders that the school does not use corporal punishment
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse;
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support plans for those children
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse



**BURLINGTON**  
HOUSE SCHOOL

- To create an environment where staff feel supported in their safeguarding role and are able to raise concerns
- To develop effective working relationships with all other agencies, involved in safeguarding children
- To ensure that all adults within our school who have access to children have been checked as to their suitability; this includes other community users of our facilities (see Safer Recruitment policy)
- To take in to account the nature, age range and other significant features of the school such as SEN, looked after children, FGM, mental health, body image issues, self-harm, children missing in education, radicalisation or other issue

The school has a number of arrangements in place for listening to children including a School Counsellors, Form Tutors, Learning Support Assistants and mentoring from other identified members of staff for children specifically identified as vulnerable. The Leadership Team has an open door policy for both staff and pupils.

Note: the school does not have a specific 'Intimate care policy' since we are a day school and this policy is not relevant to our pupils.

## **PROCEDURES & RESPONSIBILITIES**

### **SUSPECTED CHILD ABUSE OR ILLEGAL BEHAVIOUR**

Any such suspicions or concerns will be reported to: Paul Jones (Headteacher) or Matt Farrah the DSL.

Matt Farrah - [m.farrah@bhstooting.com](mailto:m.farrah@bhstooting.com)

#### **The Deputy DSL is:**

Paul Jones - [p.jones@bhstooting.com](mailto:p.jones@bhstooting.com)

Our School Counsellor is:

Freya Aylward - [aylward@burlingtonhouseschool.com](mailto:aylward@burlingtonhouseschool.com)

The DSL has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

#### **The broad areas of responsibility for the Designated Safeguarding Lead (DSL) are:**

i) Managing referrals

ii) Open channels of communication with local statutory agencies/ refer all cases of suspected abuse to the local authority children's social care and:

a) The LADO(s) for child protection concerns (all cases which concern a staff member),



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HOUSE SCHOOL

- b) Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- c) Police (cases where a crime may have been committed).
- d) Refer cases to the Channel programme where there is a radicalisation concern
- iii) Liaise with the Principal to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- iv) Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- v) 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.
- vi) Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff.
- vii) monitor effectiveness of policies and procedures in practice, in conjunction with the Principal and other DSLs.
- viii) Take an overview of online safety with delegated responsibility to the school's Online Safety Officer, Laura Dolan
- ix) Training staff and maintaining up-to-date, accurate school policies and procedures

**The Deputy Designated Safeguarding Lead (DDSL)** role is to support the DSL in managing cases, where there are too many referrals to deal with in one day or the DSL is absent.

The Headteacher regularly meet with, advise and support the DSL as part of Child Protection oversight.

## **GUIDELINES FOR STAFF**

### **1. Introduction**

It is essential that all staff are aware of the ways in which children are abused and the action which needs to be taken to safeguard them. We recognise the particular vulnerabilities of the pupils at Burlington House School Tooting due to their SEN diagnosis. All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided at as early a stage as possible and as a result if a member of staff has a concern they act on it as soon as is practically possible. All staff have a role to play in identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point. Staff are particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs  
is a young carer
- is frequently missing/goes missing from care or home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care

In the first instance staff would discuss early help requirements with the DSL, or the DDSs if they are not available. This involves identifying emerging problems, sharing information with other staff, parents and professionals to support early identification and maybe acting as a lead professional in undertaking an Early Help Assessment (EHA).

These guidelines are designed to provide clear advice and instructions to be followed when a suspected case of abuse occurs.

Details of early help are in [KCSIE 2024](#) and [Working Together to Safeguard the Children Dec 2023](#)

KCSIE 2024 states 'In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

### **2. Action Summary**

All cases of suspected child abuse should be given the highest priority. The following course of action should be adhered to:

*Where you think there might be reasonable grounds for suspecting abuse:*

**LISTEN** to what the child has to say



**REPORT** all concerns immediately to the designated person in charge of safeguarding (DSL). All staff members can make referrals using MyConcern or by speaking with the DSL and/or DDSL. Anyone can make a referral about a child to social services.

**RECORD** in detail and in writing the circumstances (including the nature and extent of any injuries) and the action taken

**REMEMBER** that speed is essential

Child abuse occurs in families from all classes, cultures and religions.

### 3. Signs and Symptoms

Visible physical injury is the most obvious indication of possible abuse. However, staff should also be vigilant to any sign of unusual or distressed behaviour. The following signs may be indications of abuse:

- Nervousness/watchfulness
- Sudden under achievement/lack of concentration
- Inappropriate relationships with peers and /or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying
- A child going missing from an education setting is a potential indicator of abuse or neglect. School and college staff members should follow their procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation.

Staff are in a particularly good position to detect child abuse and will need to be especially vigilant for:

- Injuries not consistent with the explanation given for them
- Injuries which have not received medical attention
- Instances where an injured child is kept away from school without reasonable information (attendance patterns may be of use)
- Reluctance to change for, or participate in PE or Games
- Any signs of neglect, such as undernourishment, untreated illnesses or abrasions, inadequate care
- Any allegations made by a child concerning sexual abuse
- Age-inappropriate sexual behaviour

Possible signs of abuse in line with KCSIE for FGM include:

- Prolonged or repeated absences from school.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.



- A girl may talk about pain or discomfort between her legs.

For more details, please see

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf) pg 16-17

Possible signs of abuse in line with KCSIE for child sexual exploitation include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

Practitioners should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

Any concerns regarding a change of behaviour or presentation in a child should be passed on to the designated person in charge of safeguarding (designated Safeguarding Lead). There may be other factors relating to the family background which may add to the school's concern, e.g. poor relationships between parent and child, stress within the family, unrealistic parental expectations of the child.

If it is decided by the DSL that the child is in need of additional support, they will make a referral to children's social care but it is important to note that any staff member can refer their concerns to children's social care directly.

For Lambeth, contact the Lambeth Safeguarding Children Partnership on 020 7926 5555 or on

[helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)

Please note that the school works with many different boroughs in Greater London and Surrey.

### **Types of Abuse and Neglect**

**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. They may be abused by an adult or adults or another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they





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

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

**Online abuse:** (refer to online safety policy) Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Online abuse is much harder to detect unless a child who has been victimised chooses to share.

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

**Children Missing Education:** all staff should be 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 child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation 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 should be aware of the school's unauthorised absence and children missing from education procedures, namely to contact parents in the first instance (where reasonably possible the school will hold two or more contacts for the child), report significant or ongoing concerns to the Leadership Team and SENCO who will liaise with external agencies such as the appropriate Local Authority.

**Children with family members in prison: (From KCSIE 2024)** - 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.



BURLINGTON  
HOUSE SCHOOL

Here at Burlington House School Tooting we aim to identify and support pupils/students who have a family member in prison. This could include;

- Counselling for the pupil
- 1:1 sessions for the child with a member of the safeguarding or pastoral team
- Regular communication with home to build and maintain a supportive relationship

### **Child sexual exploitation, child criminal exploitation (county lines) and serious violence**

All staff should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may range from increased absence to friendship changes to unexplained new possessions and include: being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment, having been involved in offending such as theft or robbery.

Please see Annex B of Keeping Children Safe in Education (Sept 2024) for further information on recent additional areas of child exploitation or risk.

### **Children Who Abuse Other Children including Sexual Violence and Sexual Harassment (Child on Child/Peer on peer abuse)**

We recognise that children are capable of abusing their peers. children can abuse other children, including through sexual violence and harassment, and that this can occur in various settings, both online and offline. As a school we work to minimise the risk of child on child/peer on peer abuse and will investigate and deal with any allegations robustly. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion. Where there is a concern that a child in school may have behaved inappropriately, this will be passed immediately to the DSL. They will discuss the matter with parents and it may be necessary to make a referral to Children's Social Care or CAMHS (Child & Adolescent Mental Health Service) and/or police as appropriate.

The alleged incident may be between two pupils not during school hours, including online, however the incident will still be investigated and normal procedures followed as if during the school day.

Managing situations where children have been abused by other children can be complex and stressful. Child on child/peer on peer abuse can manifest itself in many ways, for example bullying (including cyber-bullying), children being sexually touched/assaulted, also including upskirting or subject to initiation /hazing type violence and rituals. We are conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse/activity; physical harm; emotional abuse and/or verbal abuse.

It is important that all staff recognise the indicators and signs of child on child/peer on peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals.



There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. Harmful sexual behaviours in children may be (and often are) a symptom of either their own abuse or exposure to abusive practices or materials. Children who abuse others will be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

When allegations are found to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else.

All staff should understand that even if there are no reports in their schools or colleges 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 child on child/peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

In all cases relating to child on child/peer on peer abuse, both perpetrator and victim will be monitored and looked after.

### **Sexual Violence and Sexual Harassment between Children**

We recognise these definitions to understand sexual violence and sexual harassment. These definitions may be adapted or clarified on an annual basis as the guidance changes.

**Rape:** *A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.*

**Assault by Penetration:** *A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.*

**Sexual Assault:** *A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.*

**Sexual Harassment:** *'Unwanted conduct of a sexual nature' that can occur online and offline (context of child on child sexual harassment). Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.*

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. When considering harmful sexual behaviours, ages of the children, the stages of development of the children and wider environmental factors are critical factors that need to be considered.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.



BURLINGTON  
HOUSE SCHOOL

We make clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We do not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys” or tolerate challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Some of these behaviours are gendered in nature (i.e. that it is more likely that girls will be victims and boys perpetrators). We recognise also that LGBT pupils may be vulnerable to abuse due to their individualised circumstances. Dismissing or tolerating such behaviours risks normalising them.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration.
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- Communication barriers and difficulties overcoming these barriers.
- Children who are perceived as being Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

KCSIE 2024

- ‘Schools and colleges should 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 department’s: [NSPCC safeguarding and child protection for SEND](#)’
- Children who are lesbian, gay, bisexual, or gender questioning: ‘This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.’

## Sexual Harassment

This can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual “jokes” or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting/youth-produced sexual imagery); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- Upskirting: taking a picture under a person’s clothing without them knowing to obtain sexual gratification or cause the victim humiliation. It is now a criminal offence.



The following situations are statutorily clear:

A child under the age of 13 can never consent to any sexual activity.  
The age of consent is 16. Sexual intercourse without consent is rape.  
Rape, assault by penetration and sexual assault are defined in law.  
Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting).  
This includes children making and sharing sexual images and videos of themselves.

When there has been a report of sexual violence, the designated safeguarding lead would undertake an immediate risk and needs assessment, which would consider the victim, the alleged perpetrator; and the other children (and if appropriate staff) at the school. The risk assessment would be recorded (written or electronic) and would be under review. The DSL would not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children.

If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. If the DSL decided to make a referral to Children's Services or the police against the victim's wishes, this would be handled extremely carefully, and the reasons would be explained to the victim and appropriate specialist support offered. It may be decided that the children involved do not require statutory interventions but may benefit from early help.

#### **Useful advice is available from:**

NSPCC: Harmful sexual behaviour and signs, indicators and effects:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexualbehaviour/signs-symptoms-effects/>

The Brook sexual behaviours traffic light tool:

[www.brook.org.uk/our-work/category/sexualbehaviours-traffic-light-tool](http://www.brook.org.uk/our-work/category/sexualbehaviours-traffic-light-tool)

NICE Guidance: <https://www.nice.org.uk/guidance/ng55> Rape Crisis or The Survivors Trust:

<https://rapecrisis.org.uk/> or <http://thesurvivorstrust.org/>

The Anti-Bullying Alliance (preventing and responding to sexual bullying):

<https://www.antibullyingalliance.org.uk/bullying-type/sexual-and-gender-related-bullying>

UK Safer Internet Centre: <https://www.saferinternet.org.uk/> (0344 381 4772)

#### **Specific safeguarding issues**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk).

#### **Contextual safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. Environmental factors present in a child's life that are a threat to their safety and/or welfare can include:



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HOUSE SCHOOL

- **Child sexual exploitation (CSE)**  
Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology
- **Bullying including cyberbullying**  
Any behaviour which is the illegitimate use of power in order to hurt others, or the deliberate intent to harm someone physically or emotionally, is bullying behaviour
- **Domestic violence**  
Any incident of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality.
- **Drugs**  
Any incident of a child taking drugs, being coerced to take drugs, living with someone taking drugs or being exposed to the abuse of drugs.
- **Fabricated or induced illness**  
A rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.
- **Faith abuse**  
Faith and belief-based child abuse, including practices around 'spirit possession' and 'witchcraft', is a hidden crime, which makes it difficult to quantify in terms of magnitude.
- **Female genital mutilation (FGM)**  
FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

*\* it is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the school's DSL and involve children's social care as appropriate.*

Brixton Police Station, 367 Brixton Road, SW9 7DD, Tel. 101

- **Forced marriage**  
A forced marriage is a marriage where one or both people do not consent to the marriage and pressure or abuse is used to coerce marriage.
- **Child criminal exploitation**  
When children are trafficked, exploited, groomed or coerced into committing crimes. They may become involved with gangs, county lines and/or serious criminal networks. Indicators of children at risk may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, self-harm, changes in well-being, signs of assault, unexplained injuries, unexplained gifts or new possessions.





BURLINGTON  
HOUSE SCHOOL

- Gender-based violence/violence against women and girls (VAWG)  
Gender-based violence is violence directed against a person because of their gender. Both women and men experience gender-based violence but the majority of victims are women and girls.
- Honour based violence ((HBV)  
This is a form of domestic abuse which is perpetrated in the name of so called 'honour'. Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community
- Hate  
an action, typically one involving violence, that is motivated by prejudice on the basis of race, religion, sexual orientation, or other grounds.
- Private fostering  
Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering under the Children Act 1989. In these cases the school or college should notify the local authority of the arrangements.
- Radicalisation  
Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

KCSIE 2024 Note: Preventing radicalisation Note: This preventing radicalisation section remains under review, following the publication of a new definition of extremism on the 14 March 2024. Children may be susceptible to radicalisation into terrorism. 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 is the process of a person legitimising support for, or use of, terrorist violence.

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

- Sexting  
Definition of Sexting (Source: UKCCIS 2016)  
'The production and/or sharing of sexual photos and videos of and by young people who are under the age of 18.' It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth-produced sexual imagery'.  
'Sexting' does not include the sharing of sexual photos and videos of under-18s with or by adults. This is a form of child sexual abuse and must be referred to the police.



**BURLINGTON**  
HOUSE SCHOOL

- Domestic violence
- Children missing in education, those who are frequently absent or those who have been permanently excluded from school
- Children involved in the court system and/or having been involved in offending
- Children with family members in prison
- Homelessness
- Radicalisation
- Mental health
- Teenage relationship abuse and child on child/peer on peer abuse  
Teen dating violence is the physical, sexual, or psychological / emotional abuse (or violence) within a dating relationship among adolescents
- Trafficking  
Child trafficking and modern slavery are child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold.
- Children who run away or go missing (from home or care)  
Awareness raised particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.
- Elective home education  
Although many children have positive experiences of home education, for some children it means they are less visible to services that are there to keep them safe and supported. If a parent or carer expresses their intention to educate a child at home, the local authority, school and other key professionals should work together to coordinate a meeting with the parent or carer. This is particularly important if a child has special educational needs and disabilities (SEND), is vulnerable or has a social worker.

#### **4. Action by the school**

**(a)** A child may tell you that he/she has been abused or you may have good reason to suspect that abuse is taking place. Where a pupil feels able to disclose abuse to a teacher, it is generally a sign of a strong and trusting relationship. Such a disclosure may, however, come as a great shock to the teacher concerned, but it is, of course, important not to let any indication of repugnance or judgement about the abuser become obvious to the pupil. Care will be needed to offer reassurance to the pupil that they have done the right thing in telling you and they will be taken seriously and supported, without making promises that you may be unable to keep. At the same time explain the need to involve other adults.

**(b)** In both cases, the member of staff who has been approached should talk quietly with the pupil. The conversation should be held in a quiet area where there are not likely to be any interruptions





and the staff should be aware of the importance of adopting a supportive and listening role. Staff should avoid 'leading questions', should not make any attempts at cross-questioning, nor, where physical abuse is concerned, at undressing the pupil or photographing any injuries. It is also important to remember that it is a difficult subject for children to discuss and, in addition, they may be afraid of the implication of 'telling' or may even be under threats of reprisals.

**(c)** The member of staff should always make detailed written notes (as much as possible in direct speech), as soon as possible after the disclosure (but not during the conversation). This written submission should then be signed, timed and dated, and then be discussed immediately with the DSL or a DDSL if the DSL is unavailable. Children who have disclosed should not be taken to the designated person and asked to repeat what they have disclosed, although the designated person can seek clarification or additional information. The recipient of the disclosure has a responsibility to record initial information on behalf of the child.

**(d)** It is important to record in detail all available information since legal proceedings may arise from the investigation that follows a referral. This should include the sequence and time of events, the personnel involved, sketches to show the position of any physical injuries and a description of the child's demeanour. Any comments made by the child or parents/guardians should be noted accurately as soon as possible and given to the Designated person in charge of safeguarding (DSL) to secure. All hand-written notes, even if subsequently typed, must be kept. All notes and typed text must be signed and dated, as well as counter-signed and dated by the DSL or Deputy DSLs. Notes from disclosures may become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation.

**(e)** The DSL will consult with the relevant medical and Social Care agencies as appropriate, within 24 hours of a disclosure or suspicion of abuse. Since the school may have cause to deal with a number of boroughs, contact details can be obtained, as appropriate from The Principal's Personal Assistant. When deciding whether to make a referral following an allegation or suspicion of abuse, the designated child protection officer (and Principal) will not make their own decision over what appears to be borderline cases but rather any doubts or concerns will be discussed with Children's Services and/or the LADO. This may be done tentatively and without giving names in the first instance. What appears trivial at first can be later revealed to be much more serious, and an allegation of child abuse or neglect may lead to criminal investigation. Thus 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.

The DSL may wish to speak to the parents/carers about the disclosure a child has made (even if the disclosure is against them), the actions to be taken and the reasons for the actions. This should ideally be done in person with a DDSL present if required. Notes should be taken during this meeting: parents should be informed of this at the start of the meeting and subsequently provided with a copy of them if requested.

**(f)** The Designated person in charge of safeguarding (DSL) may, at his/her discretion, inform the Chair of Governors of a referral of child abuse, but not the identity of the child or any details.

**(g)** If an injury is so serious that immediate medical treatment is required, the Principal or Designated person in charge of safeguarding (DSL) will arrange for the child to be taken to hospital. The parent(s)/carer(s) will be informed that this action has been taken.

**(h)** It is essential that children who are known to be at risk, or about whom there has been concern in the past, are observed closely in school and that the appropriate Social Care Office is alerted immediately if there are any further concerns.



If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately. Referrals should be made via the Designated Safeguarding Lead. If the child's situation does not appear to be improving the Designated Safeguarding Lead with concerns should press for reconsideration. Concerns should always lead to help for the child at some point. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

**(i)** If it is decided by the DSL that the child is in need of additional support from one or more agencies, then inter-agency assessments using local processes, including use of the early help assessment (formerly known as Common Assessment Framework, CAF) and Team Around the Child (TAC) or MASH approaches should be used. Parental and pupil consent is not required for a referral to statutory agencies where there is concern about the child's safety.

**(j)** Information relating to individual cases is strictly confidential and child protection records should therefore be kept separately from the school records.

**(k)** When a child known to be at risk transfers to another school, the Principal will contact the new Head urgently to give details of the current situation and past concerns. All confidential records will be sent under separate cover by the DSL

**(l)** In cases where the school must deal with abuse, including sexting and any other relevant issue such as passing off abusive comments and interactions as mere 'banter', sexual assaults and gender based issues, by one or more pupils against another pupil, as far as is reasonably possible, the pupils involved must be segregated from each other at all times. This may involve supervision by an LSA or member of teaching staff or the re-organisation of the timetable or changes to rooming arrangements. It should be made clear that staff should in no way intervene bar the discharge of their duty of care nor should they be seen to be taking sides. Monitoring of peer group reactions should take place by all teaching staff and reported to the designated person in charge of safeguarding (DSL). In such cases where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm the DSL will report concerns to the LA social care department. All action taken by the school to ensure the safety of each pupil involved should be reported to the parents of the children involved. Legal advice may be taken, as appropriate. See also Anti-bullying policy.

### **(m) Safeguarding Adults**

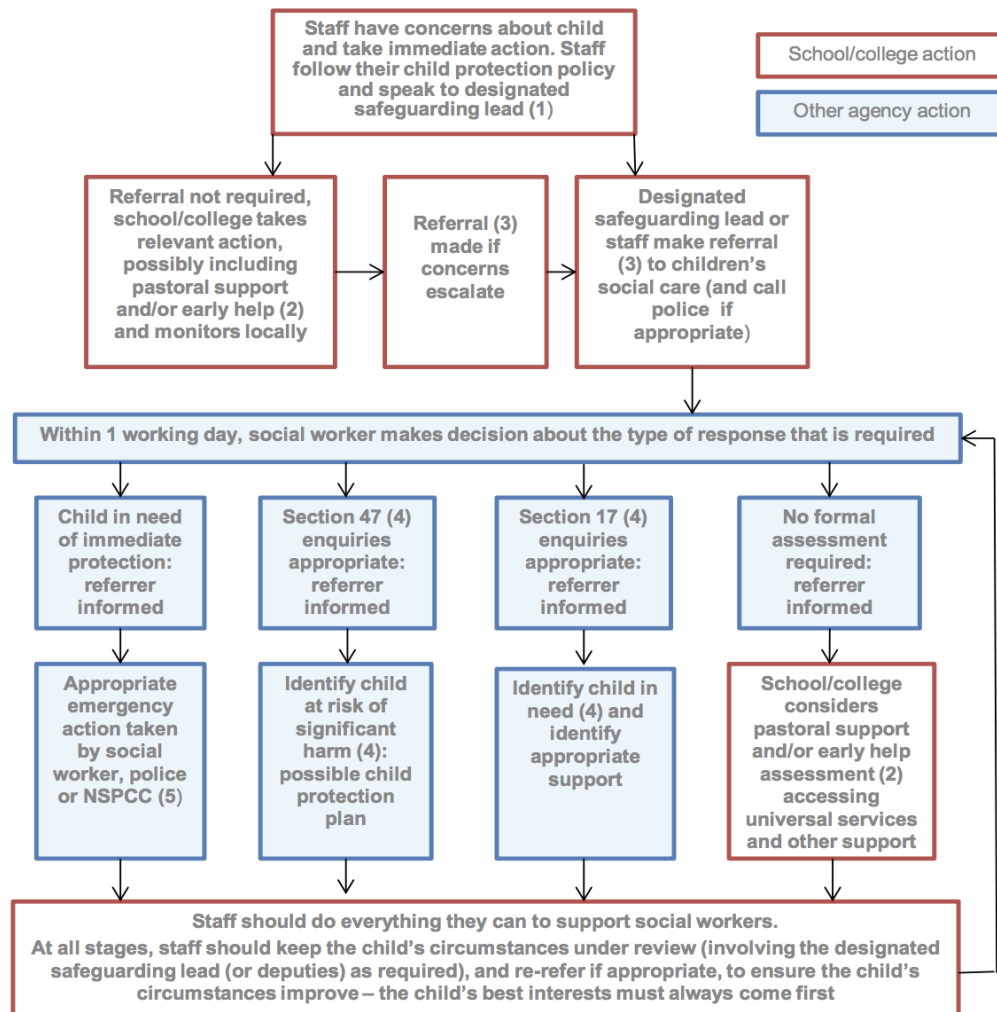
Part of early help may involve safeguarding adults. This could include knowing that;

- carers or family members are a recovering addict
- are struggling with responsibilities
- are subject to financial hardship
- is experiencing a difficult situation such as divorce or bereavement.

In all of these cases, someone from the safeguarding or senior leadership team would be in touch to offer support and to find out if there is anything they think we could do to help.



## Actions where there are concerns about a child



Refer to KCSIE Sept 2024

## 5. Radicalisation Disclosure

### The National Prevent Strategy

Burlington House School Tooting supports the Home Office '4P' Prevent strategy to combat radicalisation and terrorism.

The 4 P's are:

**Protect** - to strengthen protection against a terrorist attack in the UK or against its interests overseas and so reduce their vulnerability. This work focuses on border security, the transport system, national infrastructure and public places



**Prepare** - to mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase the UK's resilience to facilitate recovery from its aftermath

**Pursue** - to stop terrorist attacks by detecting, prosecuting and otherwise disrupting those who plot to carry out attacks against the UK or its interests overseas

**Prevent** - to stop people from becoming or supporting terrorism. This includes countering terrorist ideology and challenging those who promote it; supporting individuals who are especially vulnerable to becoming radicalised; and working with sectors and institutions where the risk of radicalisation is assessed to be high.

**Burlington House School Tooting** - acknowledges that it is our responsibility to ensure that we are following the 4 P's through the care, support and education we provide

Whilst the first three strands are clearly the remit of the government and security services, the fourth one is one to which schools and those who work with young people in a wider setting such as Youth workers or Social Services can contribute. Burlington House School Tooting acknowledges this, supports the strategy and strives to take an active part of the Prevent section of the strategy both at a whole school and an individual level

As part of the Government's counter terrorism strategy (Prevent) any radicalisation disclosures would be made to children's social care or Channel, whichever is most appropriate. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is therefore vital that Burlington House School Tooting's staff are able to recognise those vulnerabilities. Indicators of vulnerability might include changes in friendship groups, appearance and views and any other signs of radicalisation. Early indicators of extremism include: showing sympathy for extremist causes, glorifying violence, evidence of possessing extremist or illegal literature, advocating messages similar to illegal organisations such as 'Muslims against crusades' or other non-prescribed extremist groups (such as 'The English Defence League') and secretive behaviour.

Raising Awareness of the issue of radicalisation with staff so that those who work with young people at Burlington House School Tooting appreciate that they are a front line strategy, and act accordingly. This is done through staff training, which is delivered and revisited at appropriate times through the year as opportunities arise. Burlington House School Tooting staff appreciate how positive relationships created within school can remedy the factors that create the environment for dangers of radicalisation. All staff (all BHS sites) underwent Prevent strategy CPD in September 2024 run by the Hammersmith and Fulham Prevent team and will update their training using the online Child Protection Company accreditation. Following this, it will be included in the three yearly cycle. A comprehensive Prevent Risk Assessment has been specifically developed for the Burlington House School, Tooting site, focusing on the specific needs of the pupils. Pastoral staff will specifically monitor pupils under their care and curriculum leaders will ensure that opportunities for combating radicalisation should be taken when they arise directly in lessons, and indirectly all the time in making sure no student is marginalised or excluded



BURLINGTON  
HOUSE SCHOOL

from activities or learning.

As part of wider safeguarding responsibilities staff will be alert to and report using Burlington House School Tooting Safeguarding policy:

- 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
- 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
- Other local schools, local authority services, and police reports of issues affecting their pupils
- Pupils voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

We are fully committed to cooperating with external agencies such as LAs, LSCBs, local Prevent coordinators or the police, and will maintain records of any child we have identified as being at risk. We recognise that we need to monitor access to the internet and ensure appropriate firewalls are in place. Children are taught the risks to which they may be exposed while on the Internet e. g. being exposed to extremist views/doctrines etc within PSHE and ICT curriculum. If children come across inappropriate material they are told to report the incident to the nearest teacher who will deal with it according to the school's code of conduct. If staff have any concerns, they are to raise concerns with the DSL in the school as they would any other safeguarding issue. If the DSL feels an external referral is necessary these should be made to:

LADO - Lambeth, Andrew Zachariades

tel 020 7926 4679/ 07720 828 700

email [LADO@lambeth.gov.uk](mailto:LADO@lambeth.gov.uk)

Lambeth's Integrated Referral Hub :

tel 020 7926 3100

email [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)

Lambeth Safeguarding Children Partnership email : [safeguarding@lambeth.gov.uk](mailto:safeguarding@lambeth.gov.uk)

website link: [www.rbkc.gov.uk](http://www.rbkc.gov.uk)

For Channel referrals or for more information, please contact:

Lambeth Prevent Team

[helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)

020 7926 3100

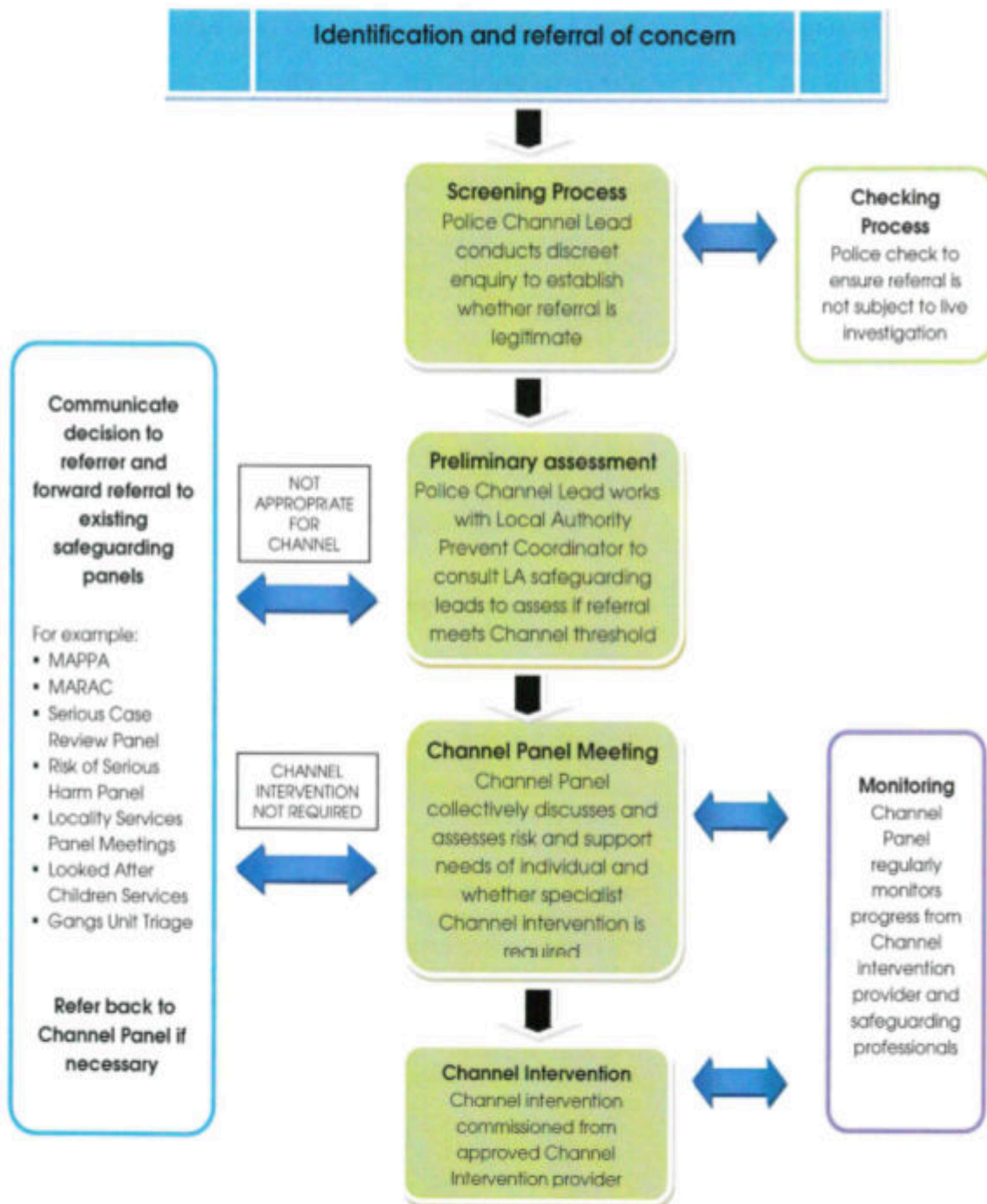
Local police force: 101 (non emergency police number)

DfE dedicated telephone helpline for non-emergency advice for staff and governors 020 7340 7264  
and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)





## The Prevent Strategy and the Channel Programme







**BURLINGTON**  
HOUSE SCHOOL

## **6. Looked After Children**

The designated member of staff who has responsibility for the welfare, health and safety and progress of LAC is the school's Designated Safeguarding Lead, Matt Farrah

## **7. Mental health and Emotional Wellbeing**

A key area of focus for the school is the emotional wellbeing of its pupils. In-school provision for listening to children and for early help includes but is not exclusive to three on-site school counsellors, the DSL and the DDSL. This team will assess each case, work with parents/carers and the child and make referrals as appropriate to CAMHS or other mental health agency via the DSL. Mental Health and Emotional Wellbeing forms part of the school's PSHE curriculum. The designated member of staff who has responsibility for the welfare, health and safety and progress of students who face mental health challenges is the school's Designated Safeguarding Lead, Tim Pragnell. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

## **8. Allegations against staff**

The school operates safer recruitment procedures (including DBS checks and compliance with Independent School Standards Regulations), whether employed, contracted, a volunteer, student teacher or other staff member. This also includes contractors who are carrying out long term work. The school also acknowledges that safeguarding is an ongoing responsibility and that induction and performance management should also include discussions around safeguarding. The school will make best efforts to ensure outside contractors will have basic safeguarding knowledge and training. *(Please also see Safer Recruitment policy, Staff Code of Conduct & Whistleblowing policy)*

There may be rare instances of allegations being reported where a member of the teaching staff or non-teaching staff or volunteer is implicated as the abuser. If an allegation is made against a member of staff (including the Principal and/or DSL) or a volunteer, the quick resolution of that allegation is a priority. Any suspicions should be reported immediately to the Principal who will, in every case, immediately consult the LADO and in the most serious cases, the police. The school will not undertake its own investigations so as not to jeopardise statutory investigations.

The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in the school. It is advised that the DSL should be contacted (unless they are the object of the allegation) since they will have received the higher level safeguarding training. The Principal may also contact the Chair of Governors to seek advice and discuss further action. Discussions will be recorded in writing and any communication with the individual and the parent of the child/children agreed.

Depending on the nature and seriousness of the allegations, the member of staff concerned may be asked to leave the school on compulsory paid leave whilst further investigations are made. Suspension will be deemed appropriate if there is no reasonable alternative. In such cases the reasons and justifications will be recorded in writing by the school and the individual notified of the reasons.

The Headteacher will advise the member of staff concerned that there has been an allegation made against him/her, as soon as s/he is able to do so, following advice from the LADO. The Principal will also consult the child's parents as soon as possible. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act





**BURLINGTON**  
HOUSE SCHOOL

2002 (see below). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If a pupil makes an allegation against the DSL, the member of staff receiving the allegation must immediately inform the Principal. If the Principal is absent, the allegation should be passed to the Chair of Governors. In the event that the alleged abuser is the Principal, then the issue should be reported directly to the Chair of Governors without informing the Principal who will then take action as described above. If there is a conflict of interest, i.e. the concern is against or includes governors, the concern can go directly to the LADO. In case of serious harm, the police should be informed from the outset.

The Lambeth Local Authority LADO is contactable at 020 7926 4678 or 07720 828 700.

The school will report promptly to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children; the Disclosure and Barring Service commenced operation on 20<sup>th</sup> January 2009 and its address for referrals is PO box 3963 Royal Wootton Bassett SN4 4HH (tel: 0300 200 190). The school will also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate for 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction, at any time for a relevant offence'. Refer to Teacher Misconduct: The Prohibition of Teachers (October 2015).

Allegations that are found to be malicious or unsubstantiated will be removed from personnel records and will not be referred to in employer references.

Pupils who are found to have made malicious allegations are likely to have breached the school behaviour policy and in these instances the Principal will consider whether to apply an appropriate sanction which may include a fixed term or permanent exclusion as well as referral to the police if there are grounds for believing a criminal offence may have been committed.

The school will work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar allegations in the future. Any records concerning allegation of abuse will be preserved for the term of the independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer. The school will make every effort to maintain confidentiality and guard any unwanted publicity up until such time as the accused person is charged with an offense or the DfE/TRA publish information themselves.

If staff have a concern about Safeguarding practices within the school: All staff should feel free to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures. Please see the school's Whistleblowing policy. Where a member of staff feels unable to go through their employer or feels their genuine concerns are not being addressed they should consult [NSPCC's what you can do to report abuse dedicated helpline](#).

### **Concerns that do not meet the harm threshold ('low-level concerns')**

KCSIE now states the requirement that governing bodies and proprietors should have policies and processes in place to deal with concerns (including allegations) that do not meet the harm threshold for Section one allegations. These may arise from a variety of sources, including suspicion, complaint, a disclosure (by child or adult) or during vetting checks.

KCSIE describes it as critical that a culture is created in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This should enable an



open and transparent culture, enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos of the institution, and protect those working in or on behalf of schools from potential false allegations or misunderstandings.

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

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.'

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with children on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

Low level concerns should be reported to a member of the senior Leadership team who will then report to the Principal . Concerns will be discussed at weekly SLT meetings. Alternatively, low level concerns can be raised directly with the Principal .

Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the Principal , the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified.

Where a third party has raised the concern, the Principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known);
- to the individual involved and any witnesses.

The Headteacher and Principal should record all low-level concerns in writing. This should include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

The records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR. They **should be reviewed** so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school should either take action through its disciplinary procedures or, if it meets the harms threshold, refer to the LADO. *KCSIE* specifies that, '**Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could**



**be revised or extra training delivered to minimise the risk of it happening again.** It is recommended that schools retain this information at least until the individual leaves their employment.

Detailed guidance is provided in *KCSIE* as to when a low-level concern should be referred to in a reference.

Where allegations involve contractors, supply and volunteer staff, agencies will be informed.

## **9. Residential trips**

The EVC is responsible for the coordination of residential trips. In the case of residential trips, such as a Year 9 activity trip, they will be responsible for giving a full child protection briefing to the staff leading the trip in liaison with the Headteacher and DSL.

## **10. Special Safeguarding Considerations for Teaching**

(Please also see Burlington House School Tooting Code of Conduct and Ethics Policy)

### **One-to-one Situations:**

Staff working in one-to-one situations with children and young people are more vulnerable to allegations. Teachers and other staff should recognise this possibility and plan and conduct such meetings accordingly. This could include pastoral meetings, sports coaching, music lessons etc.

In addition, staff should:

- Avoid meeting with pupils in remote, secluded areas of the school
- Ensure there is visual access or an open door in one-to-one situations, including sports coaching
- Inform other staff of the meeting beforehand, assessing the need to have another member of staff present
- Always report any situation where a child becomes distressed or angry

The school acknowledges its responsibility to safeguard all children and young people in potentially vulnerable situations such as changing rooms, whilst also acknowledging the child's right to privacy. In sports coaching sessions, a member of staff should not enter the pupil changing room while the pupils dress; except in exceptional circumstances such as a medical emergency. Staff should knock loudly, announce their presence and wait for acknowledgement before entering the changing room. Further considerations should be contained in Physical Education risk assessments, agreed by the Designated Person in charge of safeguarding (DSL).

### **Physical education and other activities requiring physical contact:**

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and Games, or who offer Music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or nonverbally by the child.

### **Agency and Third-party Staff:**

Written notification from any agency, or third-party organisation will be obtained to make sure that the organisation has carried out the checks on an individual who will be working at the school that the school would otherwise perform. This must include, as necessary, a barred list check, prohibition list, qualifications, right to work in the UK and overseas checks, two references, declaration of



medical fitness and check of previous employment history prior to appointing that individual to the agency, or third-party organisation. The school will also check that the person presenting themselves for work in regulated activity is the same person on whom the checks have been made, and their Enhanced DBS.

#### **Visiting speakers:**

(see Safer Recruitment policy).

The school takes care to ensure that visiting speakers are appropriate.

### **11. Child Protection (Safeguarding) training for pupils on How to Keep Safe**

The school's SENCo, together with three school counsellors, the therapeutic team, Form Tutors and LSAs, form part of a pastoral support team for the pupils.

The pupils undertake an annual climate survey which includes a question on how safe they feel in the school.

The DSL and Deputy DSLs identify themselves annually in gathering and posters of the Safeguarding team are displayed around the school including in the pupil lavatories.

Pupils are taught about safeguarding including online safety through the curriculum, in particular PSHE, Relationships Education and Relationships and Sex Education. Particular attention is paid to ensure children are able to reduce risks to themselves, and build resilience, for example, the resilience framework underpins the curriculum.

In line with the school's anti bullying and online safety policy, pupils sign an AUP, receive Gatherings regarding online Safety as well as receiving lesson updates within the ICT curriculum. The school is aware of the three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material.
- **contact:** being subject to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood or, or causes harm.

Pupils will be taught to understand the potential risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise others.

The school is kept up to date on these issues by referencing :

- The use of social media for on-line radicalisation
- [Teaching online safety in school](#) (June 2019)
- [Education for a connected world](#) (Feb 18)
- The UK's Safer Internet Centre [www.saferinternet.org](http://www.saferinternet.org)
- CEOP's Thinkuknow website [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

### **12. Child Protection (Safeguarding) training for staff**

At all times the school will have at least two staff trained in safeguarding (DSL), namely the DSL and DDSL. This training in child protection and inter-agency working and Prevent will be updated every two years. Additionally the Headteacher will undergo L3 Designated Lead training.

Child Protection awareness training, Prevent and Online Safety will be given to the staff and Governors on a regular basis - at least every two years.



Child protection training forms part of induction training and newly appointed, part time, temporary and voluntary staff who work with children will be made aware of Child Protection arrangements by the DSL.

As part of the induction process and safeguarding training, Part 1 of the Keeping Children Safe in Education Statutory Guidance for Schools (September 2024) and Annex B will be read by all members of staff and Governors. This document will be distributed to all new staff and discussed. This will be updated in line with new guidance. The DSL keeps a record of the staff policy agreement to read and understand Part 1 and Annex B of KCSIE, September 2024.

New staff will also receive a copy of the school's:

- Child Protection Policy and the identity and role of the Designated Safeguarding Lead and Deputies will be highlighted.
- Behaviour management policy
- Whistle-blowing policy
- Staff code of conduct
- On-Line Safety and AUP

Spot checks and/or updated information sessions are carried out weekly in staff briefings.

### **13. Communication with parents**

All parents/carers are made aware of the school's responsibilities in regard to safeguarding procedures through publication of the school's Safeguarding Policy, and reference to it in our prospectus and on the school website. Hard copies of the policy will be made available upon request. The DSL will keep parents/carers updated throughout the process of disclosure and referral, unless Children's Services or the police have specifically stated that this should not happen.

### **14. Governance**

- Governing bodies and proprietors should ensure that the school or college contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (December 2023) and Keeping Children Safe in Education (September 2024). This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- Governing bodies and proprietors of all schools and colleges should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). Section 10 of the Children Act 2004 requires a local authority to make arrangements to promote cooperation between itself and its relevant partners and other organisations who are engaged in activities relating to children. Under section 14B of the Children Act 2004 the LSCB can require a school or college to supply information in order to perform its functions; this must be complied with.
- Governing bodies and proprietors should ensure a member of the governing body, Aatif Hassan [a.hassan@cavendisheducation.com](mailto:a.hassan@cavendisheducation.com) is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse



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HOUSE SCHOOL

made against the Principal, the principal of a college or proprietor or member of governing body of an independent school. In the event of allegations of abuse being made against the Principal and/or where the Principal is also the sole proprietor of an independent school, allegations should be reported directly to the local authority.

- The governing body receives training in their legal responsibilities for Safeguarding.
- The Chair of Governors, Aatif Hassan has interest in Safeguarding. The governing body appoints a nominated governor to champion Safeguarding, **Stephen Aiano** [s.aiano@cavendisheducation.com](mailto:s.aiano@cavendisheducation.com).
- It is the collective responsibility of the governing body (in conjunction with the Designated Person in charge of Safeguarding) to review this policy and its effectiveness with regard to the related duties that were discharged on an annual basis. There is a termly report on Safeguarding to the Cavendish Board who both sign off on the policy and review the work of the DSL. The system is functioning effectively. (See termly minutes of the Governors' report.
- The Governor in charge of Safeguarding working with the LT will complete an annual safeguarding audit.
- The governing body acknowledges its retained responsibility for any activities carried out with children on site or using the school's facilities.
- If there are any occasions when an external organisation had responsibility for the school's pupils on a site other than the school such as at a swimming pool or activity centre, assurance should be sought that the staff of that organisation have had the necessary suitability checks.
- Therefore the governing body and Principal will only grant permission for use of the premises to recognised bodies (usually with a national affiliation and a written statement of their adherence to safeguarding principles).
- Governing bodies and proprietors should consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE), and/or – for maintained schools and colleges – through sex and relationship education (RSE).
- Governing bodies, proprietors and school or college leaders should ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Governing bodies and proprietors should ensure that staff members do not promise confidentiality to the child and always act in the interests of the child.
- Governing bodies must appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.

Matt Farrah

Designated Safeguarding Lead

Signed:

Date:

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(Chair of Governors, on behalf of the governing body)

<p><b>Summary of Contacts</b></p>
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DSL	Matt Farrah	<a href="mailto:m.farrah@bhstooting.com">m.farrah@bhstooting.com</a>
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DDSL	Paul Jones (Headteacher)	<a href="mailto:p.jones@bhstooting.com">p.jones@bhstooting.com</a>
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Safeguarding Governor for Cavendish    Stephen Aiano    [s.aiano@cavendisheducation.com](mailto:s.aiano@cavendisheducation.com)

LADO - Lambeth, Andrew Zachariades

tel 020 7926 4679/ 07720 828 700

email [LADO@lambeth.gov.uk](mailto:LADO@lambeth.gov.uk)

Lambeth's Integrated Referral Hub :

tel 020 7926 3100

email [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)



Lambeth Safeguarding Children Partnership email : [saferchildren@lambeth.gov.uk](mailto:saferchildren@lambeth.gov.uk)

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