

The BRIT School

Child Protection and Safeguarding Policy & Procedures

Author:	Claire Mullord (Designated Safeguarding Lead)
Applicable to:	Whole School, volunteers, partners, contractors
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Date of next review:	September 2024

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of BRIT staff have access to this policy and have signed to say they have read this updated version and understood its contents.

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Child Protection and Safeguarding Policy & Procedures

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Key contact personnel in school

Safeguarding Email safeguarding@brit.croydon.sch.uk

The Designated Person (CP):

Stuart Worden (Principal) SWorden@brit.croydon.sch.uk

Designated Governor:

Maggie Crowe Maggie.Crowe@bpi.co.uk

The Designated Safeguarding Team is made up of:

Designated Safeguarding Lead (DSL):

Claire Mullord (Vice Principal) cmullord@brit.croydon.sch.uk

Deputy Designated Safeguarding Leads:

Rachel Penn (Director of Pastoral) rpenn@brit.croydon.sch.uk

Arfan Shah (Assistant Director of Pastoral) ashah@brit.croydon.sch.uk

Other safeguarding staff:

- Phillipa Lucas (Head of Year 10) plucas@brit.croydon.sch.uk
- Nick O'Kelly (Head of Year 11) nokelly@brit.croydon.sch.uk
- Olivia Green (Student Wellbeing Officer) OGREEN@brit.croydon.sch.uk
- Designated CLA teacher (KS4) Arfan Shah ashah@brit.croydon.sch.uk
- Belle Casbarra (Pastoral Admin) icasbarra@brit.croydon.sch.uk

The BRIT School Commitment

The BRIT School is committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.

Our policy applies to all staff, supply staff, governors, contractors and volunteers working in the school and takes into account statutory guidance provided by the Department for Education and local guidance issued by the Croydon Safeguarding Children Partnership (formally known as Croydon Safeguarding Children Board).

We will ensure that all students and their parents/caregivers are made aware of our responsibilities with regard to child protection procedures and how we will safeguard and promote their welfare through the publication of this school safeguarding and child protection policy.

Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

Definition of Safeguarding in Schools

"We expect all schools to have an open and positive culture around safeguarding that puts pupils' interests first and protects them from serious harm" (Inspection framework, Ofsted, 2023).

All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead/Principal will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual student situations or identifying features of families as part of their oversight responsibility.

Safeguarding is about **every** young person at BRIT and is **every** member of staff's responsibility.

There are four main elements to our child protection policy:

- **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures).
- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns).
- **Support** (for all students, parents and staff, and where appropriate specific intervention for those who may be at risk of harm).
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and trustees and are consistent with those of Croydon Safeguarding Children Partnership.

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(Sept 2023\)](#) and [Working Together to Safeguard Children 2018](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children partnership.

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Child Protection and Safeguarding Policy & Procedures

[What to do if you're worried a child is being abused \(DfE2015\)](#)

[The London Safeguarding Children partnership child protection procedures](#)

[Croydon Safeguarding Board local policies and procedures](#)

[London Child Protection Procedures 2023](#)

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- The Education and Training (Welfare of Children) Act 2021 (Royal Assent TBC)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

Related policies

This policy links closely with related policies – Anti-Bullying, Anti-Drugs Policy, Behaviour Management, Educational Visits, E-Safety, Equal Opportunities, Harmful Sexual Behaviour and Harassment (HSB) Policy, Health and Safety, Lanyard policy, Lockdown Policy, Online Safety Policy, the Staff Code of Conduct and Use of Force.

Key responsibilities and immediate action

All adults working at The BRIT School (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to a member of the Designated Safeguarding Team with responsibility for child protection. If in the very rare instance a member of that team is not available all members of staff are able and encouraged to report such concerns to the relevant borough social care team; instructions on how to do this are found on the safeguarding cards, carried with staff ID badges.

The Designated Safeguarding Team is made up of:

- **The Designated Safeguarding Lead (DSL):** Claire Mullord (Vice Principal).
- **The Deputy Designated Safeguarding Leads:** Rachel Penn (Director of Pastoral); Arfan Shah (Assistant Director of Pastoral).
- **Other safeguarding staff:** Philippa Lucas (Head of Year 10); Nick O'Kelly (Head of Year 11); Olivia Green (Student Wellbeing Officer), Belle Casbarra (Pastoral Admin).
- Our **Directors and/or Assistant Directors of Strand** are also trained to Safeguarding Level 3 (in July 2022).

Should it be necessary, in extreme cases, CP cases will be referred to the Principal, Stuart Worden. The Principal will also be copied in on all referrals made to the duty desk at the relevant Social Services team.

- **The Designated Person (CP) is:** Stuart Worden (Principal).
- **Designated Governor:** Maggie Crowe.
- The governing body and committees have been trained in safeguarding and their statutory duties, and have read and follow KCSIE 2023.
- The school has a nominated governor for safeguarding. The nominated governor will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that

locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

- The Governing Body, Principal and Leadership Team will ensure that the DSL & team are properly supported in their role.

The Designated Safeguarding Lead (DSL) and Team

The DSL and team are the focal point for staff who have concerns about an individual child's safety and the first point of contact for external agencies that are pursuing Child Protection investigations.

- The school has appointed a member of the leadership team, Claire Mullord, Vice Principal as the DSL. The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in school.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- Deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

It is the role of the DSL and Team to:

- o Act as the central contact point for all staff to discuss any safeguarding concerns.
- o Maintain CPOMs, the school's confidential recording system for safeguarding and child protection concerns.
- o Coordinate safeguarding action for individual children.
- o In the case of Children Looked After the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher).
- o Liaise with other agencies and professionals in line with WTTSC 2018.
- o Ensure that locally established referral procedures are followed as necessary, dependent on borough being contacted.
- o Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences).
- o Manage and monitor the school's role in any multi-agency plan for a child.
- o Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- o Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2023).
- o Online Safety and filtering and monitoring systems are in place and working effectively.

Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn.
- Be prepared to identify children who may benefit from early support/early intervention.
- Understand the early support/early intervention process and their role in it.
- Understand your schools safeguarding policies and systems.
- Undertake regular and appropriate training, which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children's Act 1989.
- **All** staff should know what to do if a child tells them they are being abused, exploited, or neglected.
- Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
- **All staff** should be aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- **All staff** should be aware that young people may not have the words for direct disclosures and to be alert to indirect disclosures, such as drawings, writing, or suggested ideas in conversations.
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Children and Young People

Children and young people (students) have a right to:

- Contribute to the development of school safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant school/policies and procedures.
- Talk to their children about safeguarding issues & support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the school, or other agencies.

Parents can obtain a copy of the school Child Protection & Safeguarding Policy and other related policies on request and can view them via the school website.

Recognition and Types of Abuse and Neglect

All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

SEE APPENDIX 1 FOR FURTHER DEFINITIONS FOR EACH CATEGORY.

Members of staff are aware that abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness.

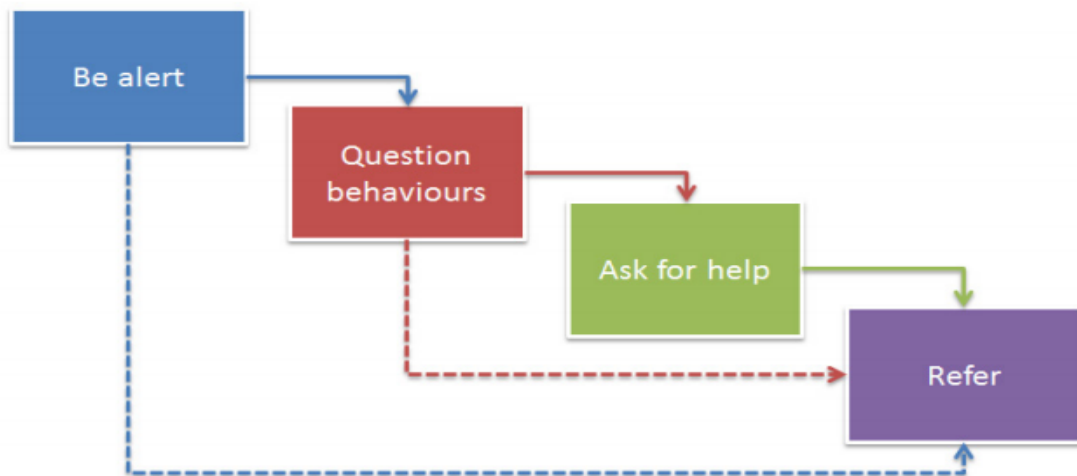
The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Safeguarding and Child Protection Procedures

All members of staff are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to the relevant borough's Children's Social Care Services and/or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

The DSL may seek advice or guidance from the relevant borough's early help/early intervention service or MASH team before making a decision regarding next steps. They may also seek advice or guidance from a duty social worker.

Where a young person is being offered or receiving early help/early intervention, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the relevant social care team if the situation does not appear to be improving or is getting worse.

All staff are aware of the process for making requests for support referrals for statutory assessments under the Children's Act 1989, along with the role they might be expected to play in such assessments (there are instructions to follow on the safeguarding card in their lanyards).

In all but the most exceptional circumstances, parents/carers will be made aware of the concerns for their child at the earliest possible stage. In the event of a request for support from social care being necessary, parents/carers will be informed and consent to this will be sought, unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm or would undermine a criminal investigation.

In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSLs. They may also seek advice from the relevant local safeguarding service or via consultation with a social worker. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation (whistleblowing) process.

If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider re-referral or escalation. Professional disagreements (escalation) will be responded to in line with the relevant borough procedures.

Record Keeping

Staff will record any welfare concern that they have about a child using CPOMs, the school's online system for safeguarding. Staff will create a new incident record (with a body map if injuries have been observed) and will alert without delay the relevant member of the DSL and team. Records will be completed as soon as possible after the incident/event, using the young person's words. If there is an immediate concern the member of staff should consult with a DSL or DDSL, as this needs to take priority.

All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with a member of the DSL team.

Historical safeguarding records transferred from previous schools are kept for individual children and are maintained separately from all other records relating to the child in the school; where possible the information is uploaded to CPOMs. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

The Principal will be kept informed of any significant issues by the DSL.

Multi-agency Working

The BRIT School recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTTSC 2018).

Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. The BRIT School recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early support/early intervention multi-agency meetings.

The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

Confidentiality and Information Sharing

KCSIE 2023 tells us that The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The BRIT School recognises that all matters relating to child protection are confidential. The Principal or DSL will only disclose information about a student to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

All staff must be aware that they cannot promise a child to keep information confidential or 'secret' which might compromise the child's safety or wellbeing.

Confidentiality & Data Protection

The BRIT School aims to ensure that all personal data collected about staff, students, parents, governors, visitors and other individuals is collected, stored and processed in accordance with UK data protection law. Our policy (see Data Protection Policy) applies to all personal data, regardless of whether it is in paper or electronic format. We aim to ensure a balance between protecting personal information and an individual's rights to privacy and the lawful processing of personal data with the timely sharing of essential information to ensure effective safeguarding. Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of young people in our school. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk. Staff at BRIT should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about sexual violence or sexual harassment:

- o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- o The DSL will balance the victim's wishes against their duty to protect the victim and other children.
- o The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk).
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.

Regarding anonymity, all staff will:

- o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping (page 12), and allegations of abuse against staff in appendix 4.

Further detail on information sharing can be found:

- Chapter 1 – [Working Together to safeguarding children](#)
- [Information Sharing: Advice for Practitioners](#)
- [Information Commissioner's Office](#)
- [Data Protection Toolkit for Schools](#)

Complaints

The school has a **Complaints Procedure** available to parents/carers, students, members of staff and visitors who wish to report concerns. This can be found in the staff handbook and on the school website.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff Policy**. This can be found in the staff handbook and on the school website.

Staff Induction, Awareness and Training

All members of staff have been provided with a copy of Part One of "Keeping Children Safe in Education" (2023) which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Part One Keeping Children Safe in Education 2023. Members of staff will sign a declaration to confirm that they have read and understood Part One at the start of each school year.

The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school's internal safeguarding processes.

All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues (see appendix 4 for list, signs and definitions).

All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.

All staff members (including temporary staff) will be made aware of the school's expectations regarding safe and professional practice via the staff code of conduct policy.

The DSL and Principal will provide an annual update to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

Although the school has a nominated lead for the governing body, Maggie Crowe, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis, and will have read all of KCSIE (2023).

Safe Working Practice

All members of staff are required to work within clear guidelines of the school's Code of Conduct.

Staff should be aware of the school's **Behaviour Management and Physical Intervention Policies**, and any physical interventions must be in line with agreed policy and procedures.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the school's Online Safety and Acceptable Use Policies.

Staff Supervision and Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- o All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- o All staff will be supported by the DSL in their safeguarding role.
- o All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with the school's counselling service to support or other outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, or other similar organisations directly.

Safer Recruitment

The BRIT School is committed to ensure they develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.

The Governing Body and Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.

The BRIT School is responsible for ensuring that the school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands and warnings. Applicants are forewarned that we will conduct online presence checks as part of the recruitment process.

Allegations Against Members of Staff and Volunteers

Conduct and safe teaching practice

- BRIT expects staff and volunteers to set a good example to students through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns'.)
- There is a written code of conduct in place and that each member of staff, including volunteers, sign on appointment that sets out the BRIT expectations with regards to standards of professional behaviour and that all staff receive copies of the relevant related policies.
- Staff will be expected to follow the BRIT online & social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with students and/or their families. All staff and volunteers sign an acceptable use agreement before being given access to the BRIT computer system.

In the event that an allegation is made against a member of staff or volunteer, the school will follow local safeguarding partnership (Croydon) procedures for managing allegations against a member of staff.

[The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint either the Principal or Vice Principal DSL as the school Designated Manager for the purposes of the allegations procedures and they will link with the Local Authority

Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the Principal. Allegations against the head teacher will be referred to the Chair of the Governing Board, who will contact the LADO in the first instance.

Contact details for the LADO:

lado@croydon.gov.uk

Senior LADO: Steve Hall

Email: steve.hall@croydon.gov.uk

Tel: 020 8726 6000 ext.24334

Mob: 07825 830 328

LADO: Jane Parr

Email: jane.parr@croydon.gov.uk

Tel: 0208 726 6000 ext. 24817

Mob: 07716 092 630

Allegations that meet the harms threshold

An allegation is any information which indicates that a member of staff/volunteer may have:

- **Behaved in a way that has, or may have harmed a child.**
- **Possibly committed a criminal offence against/related to a child.**
- **Behaved towards a child or children in a way which indicates they would pose a risk of harm if they work regularly or closely with children.**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

The last point includes behaviour that may have happened outside of school making them unsuitable to work with children. Known as *Transferable Risk*. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Such assessments will be completed in conjunction with the LADO.

The Principal will always consult the LADO immediately the school is aware of an allegation.

Following consultation, the LADO in agreement with the Principal will decide on appropriate action and consider:

- An immediate risk assessment.
- Immediate referral to the Police.
- Consideration of disciplinary proceedings.
- Consideration of a senior strategy meeting.

Looking after the welfare of the child - the designated safeguarding lead (or deputy) will be responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the relevant local authority children's social care.

Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk. The procedures in *Working Together to Safeguard Children* (July 2018) will be followed in such cases.

When appropriate (see *guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the LADO to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2023 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

Concerns that do not meet the harm threshold - Low Level Concerns

All concerns regarding the conduct of staff working with children will be referred to the LADO to consider whether the threshold for LADO involvement is met.

The BRIT Code of Conduct (Allegations Against Staff and Volunteers, including supply staff) references the behaviours/relationships between people in a position of trust and those for whom they are responsible that are over the age of 18; this includes the need for "low level" concerns to be discussed with the LADO and for them to be recorded.

Low level concerns

At BRIT we strongly encourage staff to participate in a 'self-reporting' open, transparent culture, as part of our whole school approach to safeguarding. All concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) can be raised and will be dealt with promptly and appropriately, shared responsibly and with the right person, recorded and dealt with appropriately. This is to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and to ensure that adults working in or on behalf of the school are clear about professional boundaries.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. 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 may have acted in a way that isn't quite right. This may be that they are inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered by the LADO to be serious enough to consider a referral.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE 2023), 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.

Low level concerns should be shared as with any other concerns and recorded for future reference in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Low level behaviour concerns should be reported to Claire Mullord, DSL and Stuart Wordern, Principal.

Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Leadership Team, in keeping with the "Freedom to speak up" review. All members of staff are made aware of the school's Whistleblowing procedure and policy.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or the school are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within the school, staff and volunteers may report concerns to the following.

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a student.
- The following numbers can be used where there are issues regarding the school's overall procedures around safeguarding.
 - Croydon Council's confidential whistleblowing email address – schoolwhistle@croydon.gov.uk.
 - the Ofsted whistle-blowing line on **0300 123 3155**.
 - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday and 9am-6pm at the weekend or email help@nspcc.org.uk.

The DSL shares this information and contact details with staff in the annual safeguarding training and the numbers are displayed on the school premises.

Peripatetic teachers of Music

It is recognised that peripatetic music tutors are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.

Music tutors at BRIT are made aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:

- Ensure they behave in an appropriate manner and maintain professional boundaries at all times.
- Only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed.
- Make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why.
- Ask the child's permission first and respect their wishes.
- Self-report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken.
- All peripatetic teachers are aware of the school's safeguarding and staff conduct policies prior to starting and are regularly given safeguarding updates, in line with the rest of the school staff.

The BRIT School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

When in doubt – consult

Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have Additional Educational Needs (AEN), health conditions or disabilities.
- Are young carers.

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

Particular vigilance will be exercised in respect of students who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker and confirmed in writing; copied to the LA Lead Officer. If the student in question is a 'Child Looked After', this will also be brought to the notice of the Designated Teacher with responsibility for children in public care. The school acknowledges that students with Additional Educational Needs (AEN) are also potentially more vulnerable to abuse and being involved in serious crime.

Safeguarding Children with Additional Educational Needs (AEN), Health Conditions and Disabilities

The BRIT School acknowledges that children with AEN, health conditions and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.

The BRIT School will ensure that children with AEN, health conditions and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with AEN, health conditions and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with Special Educational Needs (SEN) and disabilities may not always outwardly display indicators of abuse.

Child on Child Abuse

All members of staff at The BRIT School recognise that children are capable of abusing their peers. Child on child abuse can take many forms, including but not limited to, bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour, violence and the sharing of nudes and semi-nudes (also known as 'sexting' or youth produced sexual imagery) whether images, videos or live streams. See appendix 2 for further information.

Staff and leadership are to be mindful that some potential issues may be affected by gender, age, ability and culture of those involved.

The BRIT School believes that abuse is abuse and it will never be tolerated.

'Upskirting' is a criminal offence and it may constitute sexual harassment (Voyeurism (Offences) Act 2019); it will not be tolerated. It typically involves someone taking a photograph under a person's clothes without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The sharing of nudes and semi nudes (also known as 'sexting'/Youth Produced Sexual Images) will not be tolerated. The school will respond to such cases in line with UKCIS "**Sharing nudes and semi-nudes: advice for education settings working with children and young people**" guidance and in line with Croydon Safeguarding Children Partnership guidance.

Gangs, County Lines, Violent Crime and Exploitation

The BRIT School recognises the impact of gangs, county lines, violent crime and criminal exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- o Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- o Increased absence from school.
- o Change in friendships/relationships with others/groups.
- o Significant decline in performance.
- o Signs of self-harm/significant change in wellbeing.
- o Signs of assault/unexplained injuries.

Online Safety and filtering and monitoring systems

It is recognised by The BRIT School that the use of technology presents challenges and risks to children and adults both inside and outside of school.

The DSL has overall responsibility for online safeguarding within the school.

The BRIT School identifies that the issues can be broadly categorised into four areas of risk:

- o **Content:** being exposed to illegal, inappropriate or harmful material.
- o **Contact:** being subjected to harmful online interaction with other users.
- o **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- o **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

The BRIT School recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2023 and has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the schools **Online Safety Policy** in the staff handbook.

The BRIT School will ensure that appropriate **filtering and monitoring systems** are in place when students and staff access school systems and internet provision.

The BRIT School acknowledges that whilst filtering and monitoring is an important part of schools' online safety responsibilities, it is only one part of our approach to online safety. Students and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.

The BRIT School will ensure a comprehensive whole school curriculum response is in place to enable all students to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

Curriculum and staying safe

We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and that of others. Online safety is integrated into the curriculum.

Our school systems support children to talk to a range of staff. Children will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

The use of School premises by other organisations

Where services or activities are provided separately by another body using the school premises, the Principal and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. [After-school clubs, community activities, and tuition - Safeguarding guidance for providers - GOV.UK](#)

If this assurance is not achieved, then an application to use premises will be refused.

Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

Appendices

These appendices are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education, 2023*.

Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect 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, 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).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic And Sexual Violence (DASV)

If a student discloses that they have witnessed domestic violence or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL as a child protection concern. The BRIT School acknowledges the additional needs for support and protection of children who are vulnerable by virtue of disability, homelessness, refugee/asylum seeker status, and the effects of substance abuse within the family, those who are young carers and students who are excluded from The BRIT School.

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

Whilst the Sexual Offences Act 2003 recognises that mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes from it, any sexual activity between an adult and a young person under 16 is a criminal offence. This acknowledges that this group of young people is still vulnerable, even when they do not view themselves as such. Where sexual activity involving a child aged 14 - 15 is disclosed to a member of the Safeguarding Team, the professional must consider whether they should discuss the case with other agencies and whether they should make a referral to children's social care, discussing it with the DSL if unsure how to proceed.

Where the sexual activity is known to be with an adult this must be referred to children's social care unless there are reasons to believe that the child is not suffering, and is not likely to suffer, significant harm. Any decision **not to do so** must be fully documented, giving detailed reasons. In all cases the professional should provide the child with information on staying safe and being healthy.

Appendix 2: Specific Safeguarding Issues

UKCIS guidance to [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) - GOV.UK](#) (December 2020)

Sharing of nudes or semi nudes (formally known as 'Sexting') to be known as 'Youth produced sexual imagery'

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

Most young people aren't sharing sexual imagery of themselves.

The incident should be referred to the DSL as soon as possible.

The DSL should hold an initial review meeting with appropriate school staff.

There should be subsequent interviews with the young people involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Child on Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, 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. It is a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019).
- 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).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

- This type of abuse should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap. We will respond to **all** reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school premises or online.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with AEN and/or disabilities, and LGBTQI+ children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

Risk factors which increase the likelihood of involvement in serious violence 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.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

Consent

BRIT is a consent based school. We seek ongoing permission to borrow equipment, to post photos online, to work physically in studios (including expert intimacy training where appropriate), to hug, etc. We also educate on healthy relationships and focus on consent in relationships via our PPD programme.

KCSIE (2023) tells us that '*Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.*

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to 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 children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found [HERE](#).

Harmful Sexual Behaviour (HSB)

This is where sexual behaviour ranges from developmentally 'normal' to inappropriate, problematic, abusive and violent. HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2023 Page 107

Policy

- BRIT recognises that sexual violence and sexual harassment between *young people* is a serious safeguarding issue and such behaviour will not be tolerated. BRIT's behaviour management and anti-bullying policies will reflect our approach and staff and *young people* will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- BRIT will follow the statutory guidance in *KCSIE (2023) Part 5* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all *young people*.
- BRIT will take all necessary steps to put in place a planned curriculum to convey our policy for preventing harmful sexual behaviour and to promote respectful behaviour between *young people* with regards to sexual conduct. BRIT will also make close links to the new Relationships Education Curriculum which is compulsory for all schools from September 2020.
- BRIT will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by BRIT and appropriate referrals made to the police and children's social care.
- BRIT will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all *young people* and staff.
- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused.
- BRIT will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

Procedures

- Not all *young people* will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the *young*

persons behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.

- BRIT will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.
- Governing bodies and proprietors should ensure that BRIT contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other young people and staff from the alleged perpetrator within the School environment. Toolkits that will support the risk assessment process include: [Brook: traffic light tool](#).
- Where the allegation involves material posted online, BRIT will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [Searching, screening and confiscation guidance](#) and [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) - GOV.UK](#)
- The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable and informing the Designated Safeguarding Lead (DSL) (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.
- When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, the alleged perpetrator(s) and all the other young people (and, if appropriate, adult students and staff) at BRIT, especially any actions that are appropriate to protect them.
- The member of staff and DSL will write up a record of the investigation that will set out how BRIT will respond to the incident.
- The DSL may take advice from MASH Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under BRIT's behaviour policies.
- Where a referral will be made to children social care or the police, the DSL will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents/carers.
- KCSIE states that Schools should carefully consider any report of sexual violence and/or sexual harassment. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on BRIT's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed. This will however need to be balanced with BRIT's duty and responsibilities to protect other young people. the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. the ages of the young people involved. the developmental stages of the young people involved. any power imbalance between the young people. if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature). that sexual violence and sexual

harassment can take place within intimate personal relationships between peers. are there ongoing risks to the victim, other young people, adult students or BRIT staff. and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- BRIT will take any necessary action to continue to safeguard the victim and other young people within the BRIT environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, BRIT will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.
- Young people who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that young people will "take sides" following a report and BRIT will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. BRIT will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- [The National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with, or related to, sexual offending.
- BRIT will consult with **Part 5 KCSIE 2023** (*specifically pages 110-115*) when managing allegations of child-on-child sexual harassment or sexual violence. BRIT will consider the 4 likely scenarios when managing reports of incidents:
 - Manage internally
 - Early Help
 - Referral to Children's social Care
 - Report to police

What to do if you are informed that a parent is on the sex offenders register

In this situation the Principal will be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the DSL if appropriate.

Children Missing from Education (CME)

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care.

- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the Local Authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Children who run away/go missing

Young people who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If BRIT becomes aware of a young person who is missing from home or care and that young person has not been reported missing to the police they should do so using 101.

Running away may be an indicator of other problems and therefore referral to MASH should be considered. Early intervention after the first episode may prevent a young person being exploited.

[Children who run away or go missing from home or care](#)

Children who are absent from education

BRIT need to be aware of those young people who are absent from school for prolonged periods or/and on repeated occasions as this may be an indicator of welfare concerns.

Multi-agency working is essential when young people are absent from BRIT and potentially at greater risk of harm. This includes liaising with social workers where a young person is on a child in need or child protection plan or is looked after by the local authority. P45 of KCSIE provides the following recommendations:

Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and

non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.

- further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- general information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.

Child criminal exploitation (CCE) and County Lines

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources. If you become aware of a child or young person who may be at risk, a referral should be made to MASH.

[Modern Slavery Awareness & Victim Identification Guidance](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- 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 or becoming pregnant.
- Displaying inappropriate sexualised behaviour.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and/or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing school or education, or not taking part in education.

[Child sexual exploitation – DfE guidance](#)

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old, however, it is believed that the majority of cases happen between the ages of five and eight.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues.
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable.
 - Finding it hard to sit still for long periods of time (where this was not a problem previously).
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating.
 - Having frequent urinary, menstrual or stomach problems.
 - Avoiding physical exercise or missing PE.
 - Being repeatedly absent from school, or absent for a prolonged period.
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
 - Being reluctant to undergo any medical examinations.
 - Asking for help, but not being explicit about the problem.
 - Talking about pain or discomfort between her legs.

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM.
 - Having limited level of integration within UK society.
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period.
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.

- o Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- o Being unexpectedly absent from school.
- o Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Breast Ironing

Is practised in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

Forced marriage

Forcing a person into marriage is a crime and therefore **mandatory for teachers to report it, and mandatory for support staff to report it to the DSL**. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk.
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation and extremism

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a [duty to prevent](#) children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk (we use the Home Office training and update training).

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities that they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Domestic abuse and/or Sexual Violence (DASV)

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

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.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

Croydon Police Force are part of [Operation Encompass](#) and as such follow the above procedures.

The DSL will provide support according to the child's needs and update records about their circumstances.

Operation Encompass

Croydon is part of the Operation Encompass service which 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 DSL) 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. (KCSIE 2023)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the relevant local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Modern Day Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Awareness & Victim Identification Guidance](#)

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification and a DBS certificate, if relevant and available to them.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times, unless they are a regular visitor with pre-approved DBS clearance. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

Appendix 3: Safer Recruitment and DBS checks – policy and procedures

General Principles

BRIT recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working here are suitable to do so and do not pose any kind of risk to children.

The School will follow the *Keeping Children Safe in Education* guidance (DfE 2023, part 3).

We will record all information on the checks carried out in the school's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors in accordance with statutory requirements.
- Verify their identity.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.
- Check that candidates taking up a management position are not subject to a prohibition from management ([section 128](#)) direction made by the secretary of state.
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.

- We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.
- We will conduct online searches.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children.
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children.
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant).
- Where the individual has received a caution or conviction for a relevant offence.
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#).
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

Trustees

All trustees (governors) will have an enhanced DBS check without barred list information and section 128 check.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees, proprietors and local governors will also have the following checks:

- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Adults who supervise students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 4: Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

False: there is sufficient evidence to disprove the allegation.

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or chair of trustees where the Principal is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the Local Authority's Designated Officer (LADO) whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's

personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the student(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain

these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After every case, whether the allegations are substantiated or are decided as unfounded, false, malicious or unsubstantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- The circumstances and any issues arising from the initial disclosure, whether substantiated or not.
- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 5: Online safety, mobile technology & filtering and monitoring in KCSIE 2023

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child 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, such as 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.

To meet our aims and address the risks above we will:

- Educate students about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology.
 - Keeping personal information private.
 - How to recognise unacceptable behaviour online.
 - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present.
 - Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones .
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#).
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- [The Professionals Online Safety Helpline](#) has introduced new resources to aid educators and professionals working with young people. These resources aim to support common queries the Helpline receives, including how to report on social media, impersonation, and sexting advice.
- <https://saferinternet.org.uk/blog/new-resources-available-from-the-professionals-online-safety-helpline>.

Filtering and Monitoring

KCSIE states that *whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs safeguarding risks.*

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

Schools and colleges will adhere to the DfE [Filtering and Monitoring Standards](#) in order to fulfil their duties.

The school or college will:

- Identify and assign roles and responsibilities to manage filtering and monitoring.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.

- o Have effective monitoring strategies in place that meet their safeguarding needs.

Further guidance on filtering and monitoring can be found at: [UK Safer Internet Centre: "appropriate" filtering and monitoring](#).

[Southwest Grid for Learning](#) have created a tool to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

Reviewing Online Safety

Due to ever evolving technology and associated risks, schools and colleges should be aware of the rapid changes and have regular reviews such as an annual review of their approach to online safety. This should be supported by an annual risk assessment which reflects current risks children face online.

KCSIE provides the following advice which schools can refer to.

UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

Appendix 6: National Support

Support for staff

- [Education Support Partnership](#)
- [Professional Online Safety Helpline](#)

Support for students

- [NSPCC](#)
- [ChildLine](#)
- [Papyrus](#)
- [Young Minds](#)
- [The Mix](#)

Support for adults

- [Family Lives](#)
- [Crime Stoppers](#)
- [Victim Support](#)
- [Kidscape](#)
- [The Samaritans](#)
- [Mind](#)
- [NAPAC \(National Association for People Abused in Childhood\)](#)
- [MOSAC](#)
- [Action Fraud](#)

Support for Learning Disabilities

- [Respond](#)
- [Mencap](#)

Domestic Abuse

- [Refuge](#)
- [Women's Aid](#)
- [Men's Advice Line](#)
- [Mankind](#)
- [Domestic abuse services](#)
- [Violence Against Women of Colour](#)

Honour based Violence

- [Forced Marriage Unit](#)

Sexual Abuse and CSE

- [Lucy Faithfull Foundation](#)
- [Stop it Now!](#)
- [Parents Protect](#)
- [CEOP](#)
- [Marie Collins Foundation](#)
- [Internet Watch Foundation \(IWF\)](#)
- [Healthy and Unhealthy Relationships](#)
- [Rape Crisis South London](#)
- [Male Rape & Sexual Abuse](#)
- [The Havens](#)

Online Safety

- [Childnet International](#)
- [UK Safer Internet Centre](#)
- [Parents Info](#)
- [Internet Matters](#)
- [Net Aware](#)
- [ParentPort](#)
- [Get safe Online](#)
- [Report Remove | Childline](#)

Radicalisation and hate

- [Educate against Hate](#)
- [Counter Terrorism Internet Referral Unit](#)
- [True Vision](#)

- End -