St Dunstan's College

P1 – SAFEGUARDING AND CHILD PROTECTION

1.0. THE FOUNDATION'S RESPONSIBILITY FOR SAFEGUARDING

1.1. This policy applies to all parts of St Dunstan's Education Foundation, including St Dunstan's College. St Dunstan's College includes both the Senior and Junior Schools, our Early Years Foundation Stage and before- and after-school care.

1.2. St Dunstan's Education Foundation is committed to safeguarding children and young people and recognises that safeguarding and promoting the welfare of children is everyone's responsibility. The Foundation is committed to acting in the best interests of the child at all times and to providing a safe and secure environment for all children in its care. Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them.

1.3. It is of paramount importance that all adults working with St Dunstan's Education Foundation are aware of their responsibility to safeguard and promote the health, safety and welfare (both physical and emotional) of all children in the Foundation, inside and outside school. All employees, governors, volunteers and other adults in regular contact with children in the care of the Foundation must, therefore, understand and comply with St Dunstan's Safeguarding and Child Protection Policy and related documents and take action where necessary to enable all children to have the best outcomes.

1.4. This policy is based on the procedures of the Lewisham Safeguarding Children Partnership available online from https://www.safeguardinglewisham.org.uk/lscp) and with regard to the following legislation and guidance:

- *Keeping Children Safe in Education* (September 2021)
- *KCSIE: Safeguarding and remote education during coronavirus (COVID-19)*
- *Disqualification under the Childcare Act 2006* (September 2018)
- *Working Together to Safeguard Children* (September 2018)
- *Information Sharing* (July 2018)
- *Revised Prevent Duty Guidance: for England and Wales* (April 2019)
- *The Prevent Duty: Departmental advice for schools and childminders* (June 2015)
- *The use of social media for on-line radicalisation* (July 2015)
- *Relationships education, Relationships and Sex Education (RSE) and Health Education* (September 2021)

- *The Independent School Standards DfE Guidance* (April 2019)
- *Mental Health and Behaviour in Schools* (November 2018)
- *Domestic Abuse Act* (April 2021)
- *Sharing Nudes and Semi-Nudes* (December 2020)
- *Statutory Framework for the Early Years Foundation Stage* (September 2021)
- *The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations* 2018

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2.0 SAFEGUARDING ESSENTIAL CONTACTS

Designated Safeguarding Lead (DSL)	**Whole College including EYFS**	**Jade McLellan Deputy Head Pastoral**	**020 8516 7290 jmclellan@stdunstans.org.uk**
Deputy Designated Safeguarding Lead (DDSL)	Senior School	Gemma Davies Assistant Head Pastoral – Head of Lower School	020 8516 7303 gdavies@stdunstans.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Junior School including EYFS	Louise Carmichael-Line Deputy Head Pastoral of Junior School Emily Rogers Head of Pre-Prep	020 8516 7397 lcarmichaelline@stdunstans.org.uk 020 8516 7325 erogers@stdunstans.org.uk
Safeguarding Governor		Judy Clements	Details available from the Bursar: lcornwell@stdunstans.org.uk

Other Safeguarding Team members

Head of the Junior School -	Laura Whitwood 020 8516 7328 lwhitwood@stdunstans.org.uk
Deputy Head Academic-	Jonny Holmes 020 8516 7290 jholmes@stdunstans.org.uk
Head of Middle School	Paul O'Dwyer 020 8516 7200 powdwyer@stdunstans.org.uk
Headmaster -	Nicholas Hewlett 020 8516 7224 headmaster@stdunstans.org.uk
Lewisham LADO	Finola Owens 020 8314 3114 LewishamLADO@lewisham.gov.uk

2.1. Those with specific responsibilities with respect to safeguarding (including but not limited to the Safeguarding Team) receive training to undertake their roles and also receive refresher training at least once every two years.

2.2. Although routinely the DSL makes referrals to external support services, anyone can make a referral to the appropriate local authority children's social care team or other relevant safeguarding partner (referral should be to the services based in the borough in which the child resides). You can do this in the first instance of concern for a child, or you can refer to the local authority children's social care team or relevant safeguarding partner if you feel that the DSL has not acted appropriately in dealing with a concern you've passed on to the College. Safeguarding children is everyone's responsibility. You can and should persist in seeking help for a child you believe to be at risk of harm.

2.3. If you think a child or young person may be in immediate danger, call 999. Otherwise contact the Lewisham Multi-Agency Safeguarding Hub (MASH) on one of the numbers listed below. If your concern regards a child residing in another London borough, you can find safeguarding contacts for all 32 boroughs on the London Safeguarding Children Board website: https://www.londonscb.gov.uk/contacts/safeguarding-contacts/ .

Lewisham Multi-Agency Safeguarding Hub (MASH) can be contacted on 020 8314 6660 or 020 8314 6000 (out of hours) or via their website.

2.4. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.

2.5. The College has positive working relationships with local safeguarding agencies and officials and interacts with statutory agencies to ensure the safety of pupils is supported effectively.

If you think a child or young person may be in immediate danger, call 999.

3.0 PURPOSES AND AIMS

3.1. All pupils at St Dunstan's College are entitled to fulfil their optimum potential and be kept safe and healthy, regardless of age, ability, sex, gender, religion, or sexual identity.

3.2. This policy and its related documents aim to:

- Ensure all staff are aware that it is their responsibility to play an active role in ensuring the safety of all the children in the school and to follow the Foundation's safeguarding policies and procedures.
- Ensure all staff are aware of their duty to report concerns to the appropriate Designated Safeguarding Lead (DSL) or, if appropriate, directly to the appropriate local authority children's social care team.

- Provide clear direction to all staff and others about expected actions in dealing with safeguarding issues in accordance with local authority children's social care procedures.
- Ensure that safeguarding concerns are identified early so that informed prompt action can be taken.
- Ensure that referrals are handled sensitively, professionally and in ways that support the needs of the child.
- Identify which children may be particularly vulnerable.
- Ensure that parents are aware of our policies and procedures.
- Make clear our commitment to the development of sound procedures and good practice, including in record-keeping.
- Make clear our commitment to working with local authority children's social care, Clinical Commissioning Groups, and police as appropriate to safeguard children.
- Give priority to the interests of pupils over those of the institution.
- Ensure that listening to children is a cornerstone of practice.

4.0 DEFINITIONS

4.1. Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental or physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

4.2. Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

4.3. Children includes everyone under the age of 18.

4.4. The following 3 safeguarding partners are identified in *Keeping Children Safe in Education 2021*. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

5.0 EQUALITY STATEMENT

5.1. 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 special educational needs (SEN) or disabilities (see section 9)

- 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 abuse
- 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

6.0 ROLES AND RESPONSIBILITIES

6.1. As stated in *Keeping Children Safe in Education 2021,* the governing body is expected to:

- Have regard to the guidance outlined in *Keeping Children Safe in Education 2021*, ensuring that policies, procedures and training in the College is effective and complies with law at all times
- Nominate a Designated Safeguarding Governor to take leadership responsibility for the College's safeguarding arrangements
- Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- Ensure there is an annually updated effective safeguarding policy which is in accordance with government guidance and Lewisham Safeguarding Children Board safeguarding arrangements put in place with the three safeguarding partners. They must ensure the policy is available via the College website or other means.
- Ensure the *Employee Code of Conduct*, *Staff Acceptable Use Agreement* and *Guidance for the Community on use of social media* are kept updated by the Foundation.
- Ensure there are appropriate policies and procedures in place to respond to children who go missing from education including having at least two emergency contacts for each child.

6.2. As stated in *Keeping Children Safe in Education 2021,* the DSL is expected to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required

- refer cases where a crime may have been committed to the Police as required
- act as a point of contact with the three safeguarding partners in line with *Working Together to Safeguard Children*
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff and leadership teams in matters of safety and safeguarding (including online and digital safety), including promoting educational outcomes by sharing information about safeguarding, welfare and chid protection issues
- act as a source of support, advice and expertise for all staff, raising awareness of safeguarding and child protection amongst staff and parents
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation including that these allow information to be shared, without consent if necessary, for the purpose of keeping children safe
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- be able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation
- be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- ensure the school's or college's child protection policies are known, understood and used appropriately
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this

- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- ensure children leaving the College have their child protection file securely transferred to the new school or college as soon as possible as well as any other appropriate information necessary to safeguard the child in their new setting
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff
- be available during school hours to discuss safeguarding concerns with staff and make adequate and appropriate cover arrangements for out of hours/out of term
- act as the designated teacher for children who have a social worker, including liaising with the relevant virtual school head.

6.3. As stated in *Keeping Children Safe in Education 2021,* whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead. With this in mind, the Deputy DSLs are expected to:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a crime may have been committed to the Police as required
- act as a point of contact with the three safeguarding partners
- liaise with the DSL to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies, in consultation with the DSL
- act as a source of support, advice and expertise for all staff
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively in the DSL's absence
- contribute towards staff safeguarding training as required by the DSL
- be alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation including that

these allow information to be shared, without consent if necessary, for the purpose of keeping children safe

- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners
- be able to keep detailed, accurate, secure written records of concerns and referrals
- be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- assist the DSL in ensuring the school's or college's child protection policies are known, understood and used appropriately
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff
- be available during school hours to discuss safeguarding concerns with staff
- liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*

7.0 IDENTIFYING ABUSE AND RECOGNISING PARTICULARLY VULNERABLE CHILDREN

7.1. Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

7.2. The safety of pupils at the College is paramount. The College takes a zero-tolerance approach to any form of abuse and takes steps to help staff understand that abuse can be present in any institution at any time.

7.3. All staff should be aware of the types and indicators of abuse so that they can identify children who may be in need of help. Known or suspected abuse will be handled sensitively but immediately and with due care. The Foundation educates staff in how to identify signs of abuse as well as ensuring awareness of historical abuse indicated by a child.

7.4. The College understands the importance of contextual safeguarding and ensures the safeguarding team consider community risks and issues that may impact on the safety and vulnerability of children in its care.

7.5. All staff at St Dunstan's College are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy and making a report on MyConcern.

7.6. Abuse takes many forms, and children experiencing abuse don't necessarily behave in set ways. However, abused children may display some of the following behaviours.

- Withdrawn
- Suddenly behaves differently
- Anxious
- Clingy
- Depressed
- Aggressive
- Problems sleeping
- Eating disorders
- Wets the bed
- Soils clothes
- Takes risk
- Misses school
- Changes in eating habits
- Obsessive behaviour
- Nightmares
- Drug misuse
- Alcohol misuse
- Self-harm
- Thoughts about suicide
- Risky sexual behaviour

The information below comes from the NSPCC website: nspcc.org.uk.

PHYSICAL ABUSE
Physical abuse is when someone hurts or harms a child or young person on purpose. It includes violent acts such as hitting with hands or objects, slapping, kicking, shaking, poisoning, burning and drowning. It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

Signs of physical abuse

Physical abuse can be indicated by:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks.
- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning.

EMOTIONAL ABUSE
Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Emotional abuse can include humiliating, ignoring, threatening or shouting at a child. It can also involve trying to control their lives, not allowing them to have friends or never saying anything kind, expressing positive feelings or congratulating a child on successes.

Signs of emotional abuse
There might not be any obvious physical signs of emotional abuse or neglect. As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age.

Young children might:

- be overly-affectionate to strangers or people they don't know well
- seem unconfident, wary or anxious
- not have a close relationship or bond with their parent
- be aggressive or cruel towards other children or animals.

Older children might:

- use language you wouldn't expect them to know for their age
- act in a way or know about things you wouldn't expect them to know for their age
- struggle to control their emotions
- have extreme outbursts
- seem isolated from their parents
- lack social skills

- have few or no friends.

SEXUAL ABUSE
When a child or young person is sexually abused, they're forced or tricked into sexual activities. Sexual abuse can happen anywhere – and it can happen in person or online.

There are two types of sexual abuse – contact and non-contact abuse.

Contact abuse is where an abuser makes physical contact with a child. This includes:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities including touching, kissing and non-penetrative sexual acts
- making a child undress or touch someone else.

Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- exposing a child to sexual acts whether in person or online (including showing pornography)
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone.

Signs of sexual abuse

Children who are sexually abused may show the following:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.
- Physical symptoms such as bruises, bleeding, discharge, pains or soreness in their genital or anal area, sexually transmitted infections or pregnancy.

NEGLECT
Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

There are 4 types of neglect.

Physical neglect is failing to meet a child's basic needs, such as food, clothing or shelter, and/or failing to ensure a child is properly supervised or kept safe.

Educational neglect is failing to ensure a child is given an education.

Emotional neglect is failing to give a child the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.

Medical neglect is failing to provide proper health care. This includes dental care and refusing or ignoring medical recommendations.

Signs of neglect

Children who are being neglected may show the following:

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes or inappropriate clothing for the weather
- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness, infections or skin issues
- repeated accidental injuries, often caused by lack of supervision
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues.
- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members.
- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol

DOMESTIC ABUSE

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;
(b) violent or threatening behaviour;
(c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. 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 sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

7.7. The Foundation recognises that children with SEND are particularly vulnerable due to additional barriers to recognising abuse. These could include assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration or communication barriers to disclosing abuse. The Foundation works together with the College SEND Team to identify signs of abuse or neglect and provide appropriate support for such children.

7.8. The Foundation recognises that children with a social worker are more at risk than other children. most pupils. This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

7.9. Where there has been abuse, the College will take actions to learn lessons.

8.0 PEER ON PEER ABUSE INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT

8.1. Peer-on-peer abuse includes but is not limited to:

- Bullying including cyber-bullying
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault (including grabbing other children's body parts without their consent).
- Sexual harassment such as sexual comments, remarks, jokes, flicking bras and online sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Sharing nudes and semi-nudes
- Initiation/hazing type violence and rituals.

8.2. Behaviour which is not abusive at first may become abusive quickly or over time. Statistically girls and young women are more likely to be abused by their peers and boys and young men are more likely to be identified as abusers. This can be driven by wider societal factors such as everyday sexist stereotypes. Pupils with SEND, certain health conditions or pupils with certain characteristics such as sexual orientation, ethnicity, race or religious beliefs can also be at higher risk of suffering peer on peer abuse including peer group isolation and prejudice-based bullying. Pupils with SEND may also be disproportionately impacted by bullying without showing signs and may face barriers to reporting these challenges. The SENDCO or Learning Support Coordinators will always be involved when there is a peer-on-peer abuse concern about a child on the SEND register. Despite this, the Foundation recognises that pupils of any age or sex are potentially at risk from peer-on-peer abuse and therefore all adults working for the Foundation must take allegations of peer-on-peer abuse seriously and be vigilant in reporting such abuse in accordance with the procedures below.

8.3. Peer on peer abuse must always be recognised as a form of abuse and should never be dismissed as banter or an inevitable part of growing up. It can have a lifelong impact and so must be dealt with seriously.

8.4. The Foundation aims to prevent peer-on-peer abuse by dealing with the risks proactively, not just reactively. All pupils are spoken to in assembly by the DSL or DDSL, with further work undertaken by Form Teachers and Tutors so that they understand the different forms of peer-on-peer abuse and how to report it in school. Annual specialist workshops on sex and relationships education and on online behaviour, referring specifically to sharing nudes and semi-nudes, are provided by external specialists and/or Foundation staff to both pupils and parents. This includes education on the 4Cs: Content, Contact, Conduct and Commerce

8.5. Positive values, including equality and respect for diversity are promoted through our PSHEE and Skills for Life programmes in order to minimise the risks of peer-on-peer abuse for vulnerable groups. Gender roles, stereotyping, prejudice, healthy relationships are among other relevant topics covered in these programmes.

8.6. The Foundation focuses on providing a safe atmosphere and culture in which pupils feel able to share their concerns openly and have them listened to. Derogatory or sexualised language or behaviour is not acceptable and will be challenged.

8.7. In addition, the Foundation provides pupils, parents and staff with training and current advice relating to the possession and sharing of indecent images of children and young people, and coercion to produce such images. Procedures are in place for dealing with incidents involving such incidents, based on the advice by the UK Council for Internet Safety (see related document *Sending Nudes and Semi Nudes* and related Policy *P15: ICT Policy*).

8.8. The Foundation recognises that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

9.0 HONOUR BASED ABUSE INCLUDING FGM AND FORCED MARRIAGE

9.1. Honour based violence is the internationally recognised term describing cultural justifications for violence and abuse. The Association of Chief Police Officers (ACPO) defines honour-based abuse as 'A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community'. This may include Female Genital Mutilation and/or Forced Marriage.

9.2. Honour based violence is a domestic abuse issue, a child abuse concern and a crime. If any child is suspected to have been victim of, or at risk of harm from honour-based violence, the DSL must be notified immediately, and this information will be passed on to the appropriate Safeguarding Children Board for the child in question.

FEMALE GENITAL MUTILATION

9.3. Female genital mutilation (FGM), or female circumcision, is an unacceptable practice where a girl's genitalia are removed or cut for cultural and religious reasons. The disclosure of FGM should be reported directly to the police as well as to the DSL.

- Female genital mutilation is child abuse.
- Female genital mutilation, or female circumcision, is illegal in Britain and can carry a sentence of up to 14 years.
- Some girls die after being circumcised.
- Many girls suffer health problems for the rest of their lives after the operation.
- Call the 24 hour NSPCC FGM helpline 0800 028 3550 if you are worried a child is at risk of FGM.
- There is a mandatory reporting duty that requires any teacher, who is informed by a girl under 18 that an act of FGM has been carried out on her, to make a report to the police.

For more details see:
https://lewisham.gov.uk/myservices/socialcare/children/female-genital-mutilation

FORCED MARRIAGE

9.4. A forced marriage is a marriage in which one or both spouses do not consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.

9.5. There is a clear distinction between an arranged marriage and a forced marriage. An arranged marriage is entered into freely by both parties, although their families take a leading role in the choice of the partner. Forced marriage is a form of abuse and should be treated as such. Any child at risk of being entered into a forced marriage should be reported to the DSL, and this information will be passed along to the appropriate local authority children's social care service for that particular child.

10.0 CHILD SEXUAL EXPLOITATION (CSE)

10.1. The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

10.2. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

10.3 The suspicion / disclosure of potential CSE should be reported to the DSL (or to local authority children's social care).

11.0 CHILD CRIMINAL EXPLOITATION (CCE)

11.1 CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

11.2 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".' Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

11.3 If a child is suspected or discovered to be involved in any sort of gang activity, the DSL should be alerted, and the appropriate Safeguarding Children Board for the particular child will be informed.

12 PREVENT AND RISKS OF RADICALISATION

12.1 The Foundation is committed to upholding its legal responsibility under the Counter-Terrorism and Security Act (July 2015) to 'have a due regard, in the exercise of our functions, to prevent people from being drawn into terrorism.' Staff must be aware of the risks posed by online activity of extremist and terrorist groups and their responsibility to identify individual children who may be at risk of radicalisation or being drawn into terrorism/extremist activity (more detailed information is found in related document *Prevent*).

The London borough of Lewisham has been identified in the Government's Prevent Strategy as one of the priority local areas for action. This borough-wide initiative

between Lewisham, the Police and other key agencies and communities aims to deter extremist groups and support vulnerable people.

Prevent is part of the national counter-terrorism strategy and aims to stop people being drawn into or supporting terrorism. The strategy focuses on three key areas which are:

- respond to the ideological challenge of terrorism and the threat from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

Possible signs of radicalisation may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

12.2 The Foundation has internet filtering in place to protect children from exposure to extremist material on the internet.

12.3 Promotion of fundamental British values and our own College values is incorporated into the curriculum, particularly in PSHEE and Stuart lessons which provide a safe environment to debate controversial issues and help build pupils' resilience to radicalisation. This supports pupils to make a positive contribution to the development of a fair, just and civil society.

12.4 The suspicion / disclosure of potential involvement in terrorism or the identification of anybody who is susceptible or vulnerable should be reported to the DSL (or directly to the Lewisham Prevent Programme at 07710 387 930 or prevent@lewisham.gov.uk who will advise on referrals to Channel if required). You can also speak to local police in person/via 101 or call the DfE helpline on 020 7340 7264/via counter.extremism@education.gov.uk. Staff should use their judgement to identify children at risk and act proportionately.

13 VISITORS INCLUDING VISITING SPEAKERS

13.1 Appropriate arrangements need to be in place for the supervision of external visitors or speakers who will be coming into contact with pupils. This guidance is outlined in full in our *Visitors Policy*. Visitors to the Foundation will be issued with safeguarding guidance (*Safeguarding Brochure*) as a matter of routine.

13.2 It is the responsibility of all staff to ensure that no visitor has unsupervised access to pupils at any time and to monitor the content of any presentation. Pupils are not allowed to invite guests on site and all invitations must be overseen by a member of the teaching staff.

13.3 As part of their general safeguarding responsibilities and the Prevent duty, staff should refer to the *Visitors Policy* which contains further information on how to ensure visiting speakers are vetted for links with extremism.

14 CHILDREN WHO GO MISSING AND CHILDREN MISSING FROM EDUCATION

14.1 St. Dunstan's College is a relatively open site and thus it would be easy for a pupil to disregard school rules and leave the site without permission. If a pupil's non-presence in a lesson or activity suggests that this may have taken place, staff should:

- Inform the DSL and College Office.
- Checks will be undertaken to try and ascertain whether the pupil is on site. Locations to be considered include: Medical room, Music rooms, LRC, Toilets, Sports Fields.
- If pupils still cannot be located, DSL will agree action to be taken with Headmaster / Head of Section.

14.2 All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities and that certain groups of children are more at risk of going missing including children at risk of harm/neglect.

14.3 The College requests that all parents/guardians provide at least two emergency contact numbers for each pupil and encourages parents/guardians to inform the College of any changes as soon as possible.

14.4 The College monitors the attendance of pupils through the daily register, addresses irregular attendance, has staff who understand what to do when children do not attend regularly and informs the local authority of poor attendance. Further detail on escalation for Children Missing Education can be found in *P9 Pupil Attendance.*

14.5 The College will liaise with Lewisham local authority when the whereabouts of a child is unclear or unknown and agree joint next steps, in accordance with the guidance in *Children Missing Education* (September 2016). This includes routine notification for children leaving the College for example due to relocation, change to home education or permanent exclusion.

15 EARLY YEARS FOUNDATION STAGE (EYFS)

15.1 The Foundation will notify Ofsted with 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

15.2 Staff are not permitted to use personal mobile phones to take photographs or videos of any children in the Early Years Foundation Stage. All staff working in EYFS, visiting EYFS or working with EYFS must read and understand *the EYFS Mobile Phones Policy*. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.

15.3 Full details of EYFS supervision arrangements and ratios can be found in related document *EYFS Supervision*.

16 LOOKED AFTER CHILDREN

16.1 The Foundation will ensure that a designated member of staff (normally the Deputy Head Pastoral) has responsibility for the welfare and progress of any pupil on roll who is looked after by a local authority, and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers. The Foundation is aware of the particular vulnerability of these children.

16.2 Any children in private fostering arrangements are also a potentially vulnerable group and the College will adhere to its mandatory duty and report any incidences of private fostering to local authority children's social care. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

17 DISCLOSURES AND REPORTING PROCEDURES – WHAT TO DO IF YOU HAVE A CONCERN

17.1 Members of staff my suspect a case of abuse from a variety of sources:

- A pupil discloses to them personally
- From behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions, burns)
- Indications through schoolwork
- A pupil informs them that he/she knows or suspects that another pupil is being abused
- Another third party informs them that he/she knows or suspects that a pupil is being abused.

17.2 Any allegation against other adults including family members will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. It is vital that all children feel listened to and taken seriously.
IF YOU BELIEVE A CHILD IS AT RISK OF IMMEDIATE HARM, YOU MUST CALL 999 BEFORE ANY OTHER ACTION IS TAKEN.

17.3 Safeguarding and Child Protection is **everybody's** responsibility, including staff, parents and visitors, and pupils and anyone can make a referral to the appropriate Local Safeguarding Children Board if they believe a child is at risk of being harmed.

Foundation Staff

17.4 All Foundation staff have a duty to report any Safeguarding or Child Protection concerns without delay. There are a number of avenues of reporting concerns:

- All College staff have access to MyConcern, the College's secure online safeguarding reporting system. Wherever possible, MyConcern should be used to log welfare, safeguarding or child protection concerns. These concerns are immediately sent to the DSL, or a nominated deputy in the absence of the DSL, who will act on them in accordance with Lewisham SCB procedures.
- Any supporting documents, such as body maps or written notes from pupils should be signed and dated and handed in to the DSL. Body maps are available from the DSL and on MyConcern, these should be used to mark any injuries seen on a child.
- If for some reason a member of staff is unable to report their concern on MyConcern, they should report their concern in writing (either hard copy or email) to the DSL or Deputy DSL without delay.
- If there is no other avenue for reporting available at the time of an incident or disclosure, the staff member may report by phone to the DSL or Deputy DSL, who will make notes which will be shared with the reporting staff member for signing as soon as possible.

Parents and Visitors

17.5 Any parent or other visitor to the College has a duty to report any safeguarding or child protection concerns. All visitors to the College are provided with a *Safeguarding Brochure*, which is also available at the College Office. All parents, guardians and other stakeholders will be made aware that there is an official procedure to be followed in any situation where a safeguarding concern is raised, and a copy of this process will be made available if they wish to read it. As outlined in this guidance, any adults with concerns about a child's safety during the course of their visit at St Dunstan's College must:

- Immediately inform the DSL
- Write careful notes about what they have heard, witnessed or have been told. Sign, time and date all notes.

Pupils

17.6 Pupils will be educated in assemblies about safeguarding procedures such that they can understand that they can approach any member of staff if they need help. Pupils also have a duty to report any Safeguarding or Child Protection concerns relating to fellow pupils. Pupils are provided with information on how to report their concerns through the College PSHEE and Skills for Life programme, and guidance is also available on Firefly. Any pupil with concerns about another child's safety at the College must:

- Immediately inform the DSL
- Write careful notes about what they have heard, witnessed or have been told. Sign, time and date all notes.

PUPIL CONCERNS AND DISCLOSURES

17.7 If a child discloses to you that they are being harmed or abused:

- Reassure the pupil that she/he is right to tell and is not to blame
- Do not promise confidentiality. Explain that you have to make sure that the pupil is safe and may need to ask other adults to help you do this.
- Believe the child. It is important to say 'I believe you and I am going to help you'.
- Remain calm. Do not show shock, anger or disbelief.
- Remain non-judgemental. Do not ascribe feelings to the child, e.g. by saying something like 'you must be angry/sad/hurt'. Simply affirm the child's feelings as they are expressed. 'It's OK to feel that way'.
- Do not question the pupil. Let the pupil tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.
- Listen carefully and repeat the pupil's words. When the pupil has finished, make sure that she/he feels secure and explain what you are going to do next.
- Follow up by making arrangements with the pupil to speak to them later. They have chosen you as an adult they can trust.
- Report. Make notes, including the date and time of the pupil disclosure on MyConcern. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. It is crucial that your notes be made as soon as possible after the disclosure, and certainly on the same working day. If you are unable to use MyConcern to log your notes, you should write them and time, date and sign them before handing the original hardcopy to the DSL.
- Do not attempt any examination or remove any part of a pupil's clothing to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate doctor.
- Do not investigate. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Children's Services and/or the Police.

WHAT HAPPENS NEXT?

17.8 All cases of alleged or suspected abuse will be treated seriously. The DSL will follow the procedures set out in *Keeping Children Safe in Education 2021.*

17.9 Normally, a co-ordination meeting between the DSL and the member of staff who has raised the concern is advised, and all matters disclosed will be treated in strictest confidence. During this meeting, consideration should be given to the provision of support for the child and for the member of staff who made the original report.

Any co-ordination meeting should also consider:

- whether medical treatment or assessment is required
- siblings and other members of the child's family
- implications for other pupils
- the likely attitude of parents/guardians
- immediate welfare of child – e.g., how does he/she get home, fear of going home, etc.

17.10 The DSL will complete an assessment using the Common Assessment Framework or other assessment guidance provided by the local authority children's social care or local safeguarding partners, which will guide the decision of whether or not to refer the child to the local authority children's social care or local safeguarding partners for further action. In situations where a child has suffered or is likely to suffer significant harm, the DSL will seek advice from the local Multi-Agency Safeguarding Hub immediately and refer to children's social care, informing the police as required. If a child has not suffered or is not likely to suffer significant harm but a concern has still been raised, the DSL will seek advice from the local Multi-Agency Safeguarding Hub and refer for an Early Help assessment or to children's social care as appropriate. In all cases, children will also be provided with pastoral support in school which will involve Team around the Child approaches as necessary.

17.11 Notes about decisions to refer or not to refer, and reasons for this decision will be made. These notes and minutes from any meetings regarding the child will be kept confidentially on MyConcern, with access available only to the DSL and other members of the Safeguarding Team as appropriate. In some cases further interventions may be necessary and these can lead to inter-agency assessment using local processes which will be overseen by the DSL.

17.12 It is best practice to work with parents and seek their consent before referring a child to external agencies. However, there may be cases where seeking consent would cause unnecessary delay or place a child at further risk of harm. In such cases, the DSL may refer the child without parental consent.

17.13 If you have reported a concern to the DSL, you can and should request follow-up information to find out what actions are being taken to safeguard the child. You should also be aware that you may be asked to support social workers to take decisions about individual children, in line with guidance from *Working Together*.

17.14 The DSL will produce a termly safeguarding report for governors. This report will summarise all reports of safeguarding and child protection concerns and the actions taken in each case. The reports will not include the names of any pupils or staff, unless there is an exceptional reason to do so.

17.15 If you have reported your concern directly to a Local Safeguarding Children Board or the LADO, you should also expect a response within 2 days. If you are unsatisfied with the response provided, or if no response has been provided, you should contact the DSL, local authority children's social care or LADO as appropriate to request action. The College and the local authority children's social care each have escalation procedures if you are unsatisfied with the outcome of your concern. You should send your concern to the Headmaster or the local authority children's social care if, after registering your dissatisfaction with the initial result with the DSL, you still feel that more should be done. local authority children's social care escalation procedures vary by locality, and can be found on the local authority children's social care websites.

18 SAFEGUARDING ALLEGATIONS AGAINST STAFF: PROCEDURES

18.1 At St Dunstan's College, we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. St Dunstan's Educational Foundation has a *Whistleblowing Policy* which is available in the Staff Handbook and on Firefly. Any allegation against a member of staff or a volunteer will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

18.2 It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

18.3 Any Safeguarding and Child Protection allegations involving members of staff or volunteers must be reported **immediately** to the Headmaster without delay. An allegation against the DSL must be referred **immediately** to the Headmaster, without informing the DSL. An allegation against the Headmaster must be referred **immediately** to the Chairman of Governors, Mr Paul Durgan, or in his absence, the Deputy Chairman of Governors, Mr Ian Davenport, who will take independent action. Where an allegation is against the Headmaster, the Headmaster must not be informed of the allegation prior to contact with the Chairman of Governors and LADO. In this instance, the DSL will also not be informed.

18.4 The Headmaster or Chair of Governors will follow the procedures set out in *Keeping Children Safe in Education 2021*. This will involve immediate contact with the Local Authority Designated Officer (LADO) to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful

not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.Discussions may also involve the Head of the Junior School, DSL, legal advisors and Governors. All discussions should be recorded in writing and communication (or not) with both the individual and the parents of the child / children will be agreed in consultation with LADO and any external agencies.

18.5 If, after discussion between the Headmaster and the LADO, it is considered that the Headmaster should handle the allegation, then he will undertake the appropriate action promptly, and normally within 24 hours. Any decision about suspension will be taken after careful consideration with due weight given to the views of the LADO.

18.6 The Headmaster has to decide whether any concern is an allegation or 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 for referral to the Local Authority Designated Officer (LADO).

18.7 Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Further information can be found in *P16 Staff Handbook*. If the concern has been raised via a third party, the headteacher/principal should collect as much evidence as possible by speaking directly to the person who raised the concern, to the individual involved and to any witnesses. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

18.8 Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

18.9 Records must be kept confidential, held securely and comply with the Data Protection Act 2018 and be kept at least until the individual leaves the Foundation's employment.

18.10 Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO. The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

18.11 The Headmaster will make every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence, or the DfE (Department for Education) and/or the TRA (Teaching Regulation Agency) publish information about an investigation or decision in a disciplinary case.

18.12 The Headmaster will ensure that the Foundation reports to the DBS (Disclosure and Barring Service) any person (whether employed, contracted, a volunteer or pupil) whose services are no long used for regulated activity and who have caused harm or posed a risk of harm to a child. In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging / refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The Foundation will respond to requests from the DBS for information they hold.

18.13 The Headmaster will also consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance to making this decision is published on the TRA website.

18.14 If there has been a substantiated allegation against a member of staff, the school should work with the LADO to determine whether there are any improvements to be made to the Foundation's procedures or practice to help prevent similar events in the future.

18.15 Parents or guardians of the child concerned must be made fully aware of the allegations. If delay arises in consulting with the LADO, then the DSL or a named deputy should maintain daily contact with the parents. However, the identity of the member of staff involved should not be given until specific legal advice has been obtained.

18.16 If the conclusion is that the allegation is completely unfounded, the decision to take the matter no further should be recorded, and the information placed in a confidential file.

18.17 When all actions undertaken as a result of the allegation have been completed, then any matters arising from that action will also be overseen by the DSL. The DSL will brief the Headmaster regularly on progress until all matters arising have been concluded.

18.18 In the event of enquiries being made by other parents, they should be told only that an allegation of misconduct has been made against a member of staff, and that it is being investigated. No further information should be given without first seeking legal advice.

18.19 Any legal advice sought does not and will not override advice received from the LADO.

18.20 Where an allegation is made against an individual not employed directly by the College, for example a supply teacher, the College will ensure the allegation is dealt with properly. This may involve working with the LADO, police, and/or children's services and employment agencies to support collection of facts, taking the lead when appropriate, and keeping the agency's human resource manager updated.

19 PEER ON PEER ABUSE AND SEXUAL HARASSMENT AND SEXUAL VIOLENCE: PROCEDURES

19.1 The College's response to reports of peer-on-peer sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead (DSL) taking a lead role, supported by other agencies as required.

19.2 If a report of sexual abuse, violence or assault is being made, particular care should be taken to ensure an appropriate environment is chosen to receive the report and that at least two members of staff are present, respecting the wishes of the pupil as to the sex/gender of these staff where possible.

19.3 All reports of peer-on-peer abuse will be responded to immediately. All staff are trained to manage a report/disclosure of peer-on-peer abuse. Staff are to ensure that where images or videos of a sexual nature are involved, they follow the procedures outlined in the related document *Sending Nudes and Semi Nudes* and **do not** view or forward illegal images of a child.

19.4 Where there has been a report of sexual violence, the DSL (or member of the safeguarding team) will make an immediate risk and needs assessment considering:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children at the College, especially any actions that are appropriate to protect them.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

19.5 The DSL will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it's likely that professional risk assessments by social workers or sexual violence specialists will be required. The DSL will use these risk assessments to inform the College's approach to responding to the report and will inform our own risk assessments. Guidance on risk assessments is found in paragraphs 440-463 of *Keeping Children Safe in Education 2021* and in the College Policy *Sexual Violence and Sexual Harassment between Children*.

19.6 The DSL is likely to be the most appropriate person to advise on the College's response to a report of peer-on-peer abuse. How the DSL manages the report, including when to inform the alleged perpetrator, will depend on a number of important considerations, which are outlined in paragraphs 440-463 of *Keeping Children Safe in Education 2021* and in the College Policy *Sexual Violence and Sexual Harassment between Children*.. Where a report is going to be made to children's social care and/or the police, as a general rule the DSL should speak to the relevant agency to discuss next steps and how the alleged perpetrator will be informed.

There are 4 likely scenarios that the DSL should consider when managing reports:

1. Some reports should be manged internally, where early help or statutory interventions are not required.
2. Some reports should be managed through providing early help (as outlined in chapter 1 of *Working Together to Safeguard Children*), where statutory interventions are not required.
3. Some reports should be referred to children's social care, where a child has been harmed, is at risk of suffering significant harm, or is in immediate danger.
4. Some reports should be referred to the police (usually in parallel with a referral to children's social care), where a report of rape, assault by penetration or sexual assault is made.

19.7 Where scenarios involve working with children's social care, the College should not wait for the outcome of an investigation before protecting the victim and other children. The DSL should work closely with children's social care to ensure the College's actions do not jeopardise a statutory investigation, however, immediate consideration must be given to safeguarding the victim, alleged perpetrator and all other children. Further advice on managing reports is found in paragraph 440-463 of *Keeping Children Safe in Education 2021* and in the College Policy *Sexual Violence and Sexual Harassment between Children*.

Ongoing response

The victim:

The nature of how the College supports the victim will depend on:

- The age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim

Often, victims may not disclose the whole picture of abuse immediately, so dialogue should be kept open and encouraged. Further guidance on supporting victims is found in paragraphs 440-463 of *Keeping Children Safe in Education 2021* and in the College Policy *Sexual Violence and Sexual Harassment between Children*.

The alleged perpetrator:

It can be difficult to balance the need to safeguard the victim (and other children) with providing the alleged perpetrator with an education and safeguarding and

implementing disciplinary sanctions. The DSL should provide support (and sanctions as appropriate) on a case-by-case basis, considering:

- The age and developmental stage of the alleged perpetrator
- The nature of the allegations and risk of harm to other children
- Any unmet needs that the alleged perpetrator may have.

Further guidance on supporting the alleged perpetrator is found in paragraphs 440-463 of *Keeping Children Safe in Education 2021* and in the College Policy *Sexual Violence and Sexual Harassment between Children*.

20 CARE LISTS AND COUNSELLING SERVICES

20.1 There is a difference between safeguarding children who have suffered or are like to suffer significant harm and those who may, for whatever reason, be in need of additional support (listening services and early help). The former are reported to Children's Social Care immediately whereas the latter can be helped in a variety of ways.

20.2 Pupil concerns will be dealt with in a friendly and supportive manner so that each pupil will develop the understanding that staff can be trusted to help in any situation. St Dunstan's Education Foundation provides a secure environment for the pupils to talk to or consult with adults who can give help if and when it is required, or who will arrange appropriate assistance for the child using external, professional agencies.

20.3 Staff are trained to recognise variations in pupil behaviour that may indicate emotional or physical concerns and guidance and support is given to pupils who may be experiencing difficulties of a sensitive nature either within school or at home, by developing appropriate and effective strategies.

20.4 The pastoral teams in the Junior School and the Senior School provide pastoral support for pupils and additional, confidential support is provided by the College's counselling service and Chaplaincy. In some cases further interventions may be necessary and these can lead to inter-agency assessment using local processes which will be overseen by the DSL

20.5 A College care list is produced and regularly updated to allow all staff to be aware of pupils who may need additional pastoral support.

- A care list, categorised into three different levels will be maintained.
- The list is updated on a weekly basis in regular meetings between the Head of Section and Deputy Head (Pastoral) and on a fortnightly basis between the Deputy Head (Pastoral) and the school's counsellors, College Nurse and Chaplain.
- The list is reviewed on a half-termly basis by the Individual Pupil Needs committee, alongside a review of other information, such as SEND, EAL, medical, academic or pastoral concerns.
- The list contains brief information on area of need, level of need and lead professional. Further details should be kept on MyConcern.

- Confidentially is crucial. No member of staff should ever divulge names on the care list to any parent or to any pupil.

Level descriptors:

- **Pupil Watch** – Pupils who we are keeping an eye on, perhaps due to a recent small upset
- **Care 1** – Pupils about whom there is an ongoing welfare concern that is being dealt with in school by pastoral care teams
- **Care 2** – Pupils about whom there is an ongoing welfare concern that is being supported by external agencies such as CAMHS, children's social care or the NHS. Any academic or pastoral concerns should be channelled through the Head of Section or identified lead professional.
- **Care 3** – Pupils who have a significant ongoing welfare concern including all children on a child protection plan or children where there is a significant risk of harm such as an eating disorder or suicidal ideation. DSL to be informed immediately of any worrying incidents including absence from lessons etc. Any academic or other pastoral concerns should be sent to the Deputy Head (Pastoral) and identified lead professional, where appropriate.

21 PHYSICAL AND MENTAL HEALTH

21.1 The Foundation recognises that promoting good physical and mental health for pupils is a priority and is committed to ensuring that physical and mental health and wellbeing of pupils is promoted.

21.2 The Foundation recognises that staff can play an important role in preventing self-harm and also in supporting pupils, peers and parents of pupils who self-harm or are recovering from self-harm (see related document *Self-Harm*).

21.3 The Foundation recognises that staff can play an important role in preventing eating disorders and also in supporting pupils, peers and parents of pupils currently suffering from or recovering from eating disorders (see related document *Eating Disorders*).

21.4 All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Further information on the link between mental health and safeguarding, along with signposts for guidance and support can be found in paragraphs 169 – 175 of *Keeping Children Safe in Education 2021*.

22 RSE, PSHEE, AND PUPIL VOICE

22.1 The Foundation contributes to the safeguarding of children through the provision of a safe environment, enabling children to understand what is and is not reasonable behaviour, educating children to become safe and effective parents, and recognising harm and possible offences against children.

22.2 One of the key ways this is achieved is through the delivery of our PSHEE programme which operates throughout the College, taught in our Stuart and Usherwood curricula. As one part of this programme, all pupils are given clear guidelines on the use of mobile phones and are taught how to stay safe online (including the dangers of cyber-bullying and sending nudes). This includes how to recognise when they are at risk and ask for help for example if they are being blackmailed online. In delivering this programme, the College refers to the resources of the UK Safer Internet Centre and CEOP's Thinkuknow website to ensure the most up to date resources are used. Further detail on the College PSHEE programme can be found in *P5 Curriculum* and on our approach to online safety in *P15 ICT Policy*.

22.3 The College also operates a College Parliament and a peer-mentoring programme as part of its commitment to ensuring children's voices are heard and that children feel listened to.

22.4 The College is committed to delivering a programme of Health, Relationships and Sex Education, in line with current guidance: *Relationships Education, Relationships and Sex Education and Health Education* (July 2020). This is delivered through tutorials, PSHEE, Skills for Life, visiting speakers and workshops.

23 SAFEGUARDING CONTINUED PROFESSIONAL LEARNING

23.1 All governors and all staff are supplied with the summary statutory guidance from *Keeping Children Safe in Education 2021 (Part One* plus *Annex A* for those working directly with children*)* and a central record is kept that this information has been received, read and understood.

23.2 All governors, staff and volunteers are supplied with copies of the safeguarding and child protection policy, undergo annual safeguarding training in accordance with Lewisham SCB procedures and receive regular reminders and bulletins about the procedures in place. A formal record is kept on the issuing of guidelines and individual training received. Annual safeguarding training includes:

23.3 The safeguarding and child protection policy, including the Prevent duty

- The expected pupil behaviour policy and behaviour management procedures
- The employee code of conduct
- The BYOD, staff acceptable use policy and guidance for community members on the use of social media
- The whistleblowing policy
- Part 1 and, for all leaders and those working directly with children, Annex A of KCSIE

23.4 The DSL, Deputy DSLs and other members of the safeguarding team, including the Head, undertake full refresher training at least every two years and the DSL attends regular network meetings as well as keeping up to date with weekly and monthly local and national safeguarding bulletins and attends Lewisham Prevent training.

23.5 Through the regular training programme outlined above, the College ensures that a culture of continued learning and development relating to safeguarding is promoted, with staff given ongoing opportunities to ask questions, raise concerns and review their own practice.

24 SAFER RECRUITMENT

24.1 St. Dunstan's Education Foundation is committed to safer recruitment in education and the Foundation's recruitment policy and procedures (see policy *Safer Recruitment and Safeguarding Questions*) will ensure pupil safeguarding remains an absolute priority when appointing staff.

24.2 All new members of staff receive safeguarding induction as soon as possible after start date, and certainly before they have unsupervised access to children. Induction training also includes training on the *Employee Code of Conduct, Safeguarding and Child Protection Policy, Expected Pupil Behaviour Policy* and the identity and the role of the DSL.

24.3 All staff must obtain assurance from any staff employed by another organisation and/or working with the Foundation's pupils on another site (for example, in a separate institution) that appropriate safeguarding checks and procedures are undertaken in accordance with the school policy.

25 STAFF CODE OF CONDUCT

25.1 Staff have the responsibility to behave appropriately and report concerns regarding colleagues in accordance with the *Safeguarding and Child Protection Policy* and *Whistleblowing Policy*.

25.2 Further information on expected staff behaviour is found in the *Employee Code of Conduct* and *Staff Guidance on Interaction with Pupils*.

25.3 Staff who are involved in performing arts, sports provision and other activities that could potentially involve close one to one teaching should pay particular reference to *Staff Guidance on Interaction with Pupils* which has detailed instructions on the safeguarding arrangements in place for these children.

25.4 All staff working in EYFS, visiting EYFS or working with EYFS must read and understand the *EYFS Mobile Phones Policy*. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.

26 MONITORING AND REVIEW

26.1 The Safeguarding Governor will meet at least termly with the Foundation's DSL to review safeguarding practice and procedures.

26.2 This policy and its implementation will be reviewed by the governors annually. The governors should consider whether the procedures are satisfactory and being properly enacted. The implementation of the policy will be checked, monitored, reviewed and evaluated. The governors' overview will consider any trends and patterns identified during the year. Their conclusions should be clearly minuted.

27 ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

27.1 Pupils are given clear guidelines on the use of mobile phones and are taught how to stay safe online (including the dangers of cyber-bullying, keeping personal data safe and the dangers of sending nudes). This includes how to recognise when they are at risk and ask for help for example if they are being blackmailed online. In delivering this programme, the College refers to the resources of the UK Safer Internet Centre and CEOP's Thinkuknow website to ensure the most up to date resources are used. Further detail on our approach to online safety in P15 ICT Policy.

27.2 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 peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
Conduct – personal online behaviour that increases the likelihood of, or causes, harm, 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; and
Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

27.3 Pupils and staff are expected to sign an Acceptable Use agreement to ensure the school ICT systems, internet and mobile data whilst in school are used appropriately.

27.4 Pupils and parents receive annual education on the most up to date online safety risks from a member of the UK safer internet centre.

27.5 The Foundation has internet filtering in place to protect children from exposure to extremist material on the internet.

28 REMOTE TEACHING AND LEARNING

28.1 The below guidance applies when individual pupils or cohorts are involved in remote teaching and learning due to the impacts of the COVID-19 pandemic.

28.2 The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads know who our vulnerable pupils are and have the discretion to offer a place to those who

are at the threshold of receiving support from local authority children's social care. The lead contact for liaison with Children's Services is the DSL.

28.3 Pastoral staff at St Dunstan's College, including Heads of Section, Heads of Year and members of the Individual Pupil Needs team, will make contact with vulnerable pupils and/or their parents on a regular basis to check on their safety and wellbeing and record a summary of this conversation on MyConcern. We also continue to work with local authority children's social care for children on a Child Protection or Child in Need plan.

28.4 Any urgent safeguarding concerns will be escalated immediately in liaison with our three safeguarding partners.

28.5 If parents of a vulnerable child do not wish for their child to attend school in person, this will be discussed with parents to ensure their child's needs can be met at home. All children, including vulnerable children, are expected to attend the College remote schooling provision.

28.6 Web-filtering remains in place for those pupils who are vulnerable or the children of key workers and are continuing to come into school and all children working online during the COVID-19 period are monitored. There are a number of IT staff available to support this on an ongoing basis.

28.7 Pupils and parents are subject to our *Pupil Acceptable Use Agreement* and *Senior School Remote Working Agreement* which detail the expectations of pupils and parents during remote online learning, including appropriate online behaviour and having suitable clothing and backgrounds.

28.8 Staff have received updated safeguarding training relating to safe online learning. All live classes and Teams have at least two teachers invited and classes are recorded and the video backed up so that footage can be reviewed if there are any concerns.

28.9 Peer on peer abuse during remote learning will continue to be dealt with according to our Safeguarding and Child Protection Policy and in accordance with the principles laid out in *Keeping Children Safe in Education 2021*.

28.10 The impacts of lockdown and remote learning on the mental health and wellbeing of children are not to be underestimated and the College will take steps to monitor the wellbeing and mental health of pupils and respond appropriately.

28.11 For all pupils in the College a daily tutorial will take place where the Form Tutor or Form Teacher will be able to monitor the wellbeing of members of their tutor group.

28.12 The College will regularly to signpost support available for mental health and wellbeing both in school and through external agencies and charities.

28.13 Where there are concerns about a pupil's wellbeing or mental health, additional measures may include online meetings with a member of the pastoral team, communication with a child's parents or carers, remote counselling with the College

Chaplain or school counsellor. Where appropriate, the College may refer to external agencies, such as CAMHS.

29 RELATED DOCUMENTS

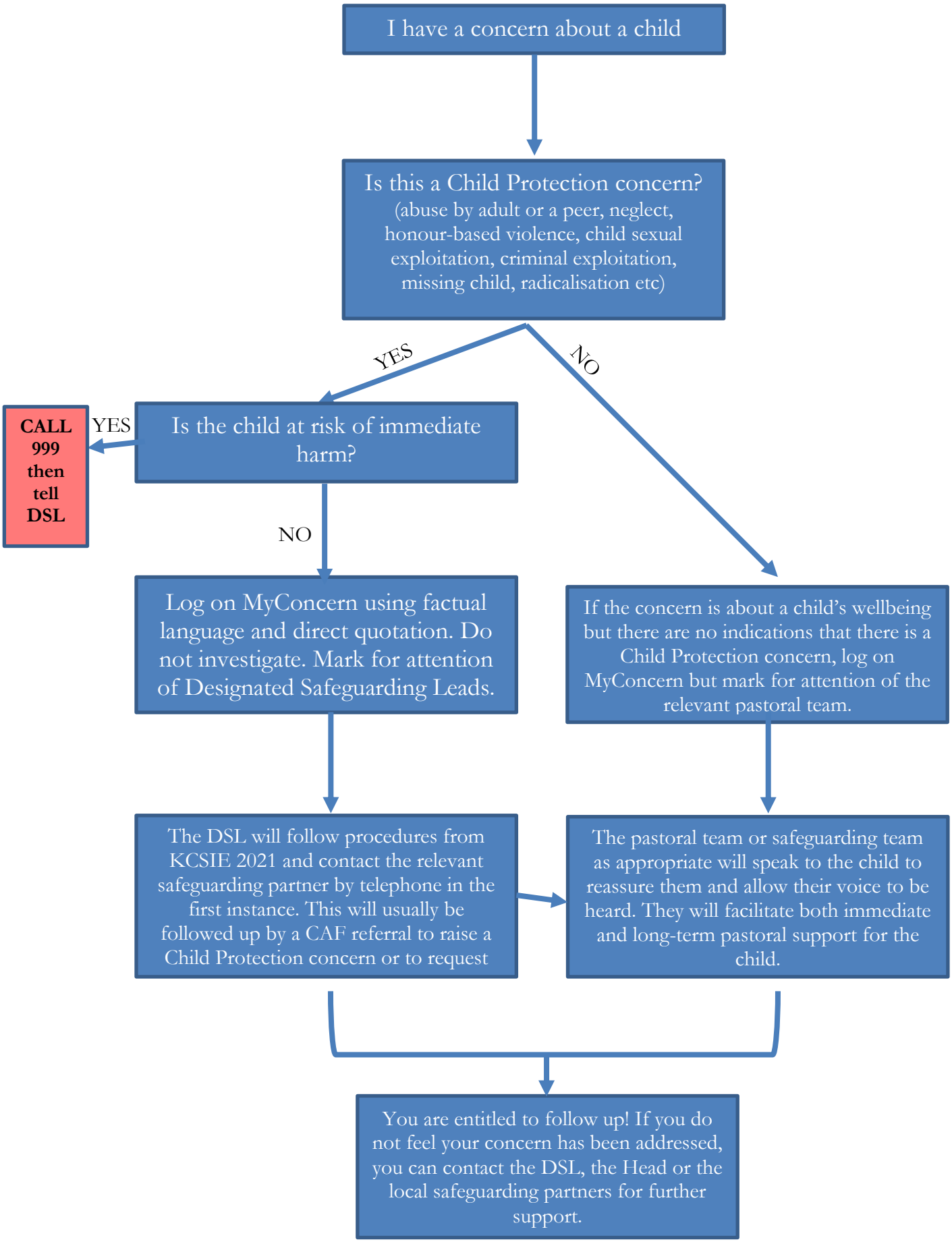
Bereavement
Eating Disorders
EYFS Mobile Phones
EYFS Supervision
Gender Identity
Prevent
Safeguarding Brochure
Safeguarding Questions
Safer Recruitment
Self-Harm
Sexual Violence and Sexual Harassment between Children
Sending Nudes and Semi Nudes
Staff Guidance on Interaction with Pupils
Staff Induction Checklist
Staff Safeguarding Handbook
Suicide Prevention Policy
Supporting a Bereaved Pupil
Supporting School Refusers
Visitors Policy

30 RELATED POLICIES

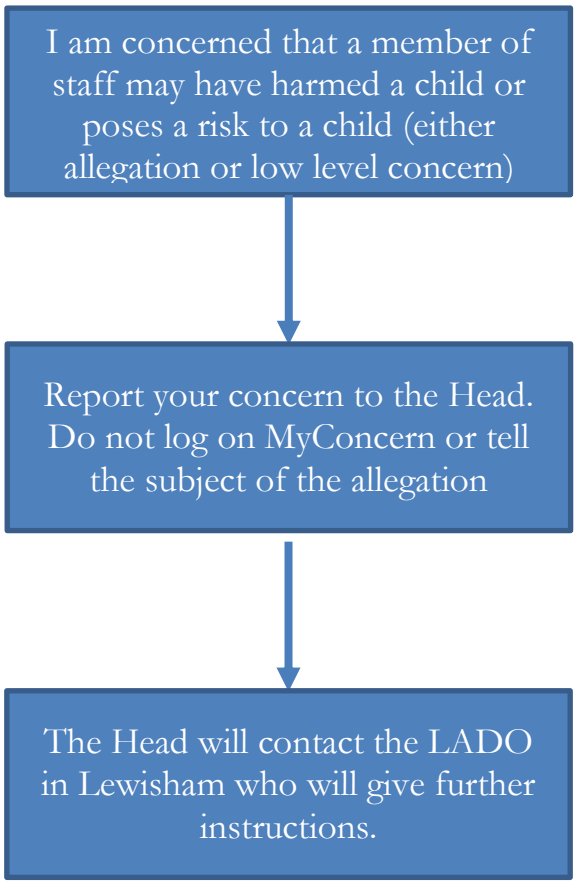
P3	Expected Pupil Behaviour
P4	Anti-Bullying
P5	Curriculum
P9	Pupil Attendance
P13	Equal Opportunities Policy
P14	Data Protection/GDPR Policy
P15	ICT Policy
P16	HR Staff Handbook including Employee Code of Conduct
P19	Whistleblowing

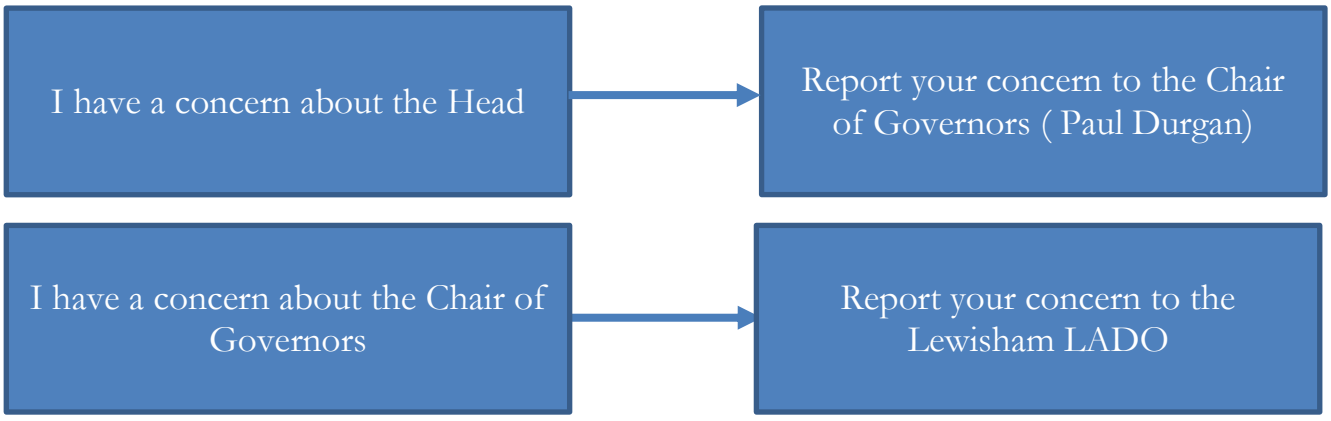
Safeguarding and Child Protection			
Author/s:	Jade McLellan	**Date Reviewed:**	Michaelmas 2021
Date Ratified:	Michaelmas 2021	**Next Review Date:**	Michaelmas 2022
Committee:	Governing Body	**Clerk to the Governors** **Signature:**	 ……

Appendix 1: What to do if you have a safeguarding concern – quick start



What to do if you have a safeguarding concern – quick start





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