Safeguarding and Child Protection Policy

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The safeguarding and child protection policy will be published on our website. Hard copies are available on request from the school office.

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1. Introduction and policy aims

The German School Group, i.e. the German School London and its subsidiary Sudbrook School, hereinafter referred to as The School, has a duty to keep children safe. This includes how we protect children from harm and how we respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at The School. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. By working collaboratively with staff, families, and the community, we are committed to ensuring that every child feels safe, supported and empowered to reach their full potential.

Adults in our school know that keeping children safe is everybody's responsibility and that all children regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion, and home circumstances have equal rights to protection and opportunities.

We aim to:

- do all we can to prevent children from coming to harm
- provide quality training to our staff so they are able to recognise potential signs of abuse, neglect and exploitation, understand what their responsibilities are and how they should respond when they identify a concern
- communicate transparently and honestly when there is a concern about a child with all those involved, including parents, other children and staff, where it is safe and appropriate to do so
- share information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home or online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of The School, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

Safeguarding team is used here to refer to the designated safeguarding lead (DSL) and deputy DSL(s) as a whole. The DSL has the lead responsibility for safeguarding and child protection (including online safety).

Child means anyone under the age of 18.

Parent means birth parents or other adults who are in a parenting role, for example guardians, stepparents, foster carers and adoptive parents.

Statutory means that we have to follow what has been decided or is controlled by the law and government guidance.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Our safeguarding arrangements are guided by and align with the KRSCP's local arrangements and London Child Protection Procedures and Practice Guidance, sometimes referred to as local safeguarding arrangements in this policy.

3. Key personnel

Key individuals and agencies

Designated Safeguarding Lead (DSL) German School London Designated Safeguarding Lead (DSL) Sudbrook School	Susanne Gause-Batra susanne.gause-batra@dslondon.org.uk Mariana Pandi mariana.pandi@dslondon.org.uk
Deputy DSL German School Deputy DSL Sudbrook School	Andrea Jansen van Rensburg andrea.jansen@dslondon.org.uk Patricia Casswell patricia.casswell@dslondon.org.uk
Children Looked After & Young Carers Designated Officer German School	Susanne Gause-Batra susanne.gause-batra@dslondon.org.uk
Children Looked After & Young Carers Designated Officer Sudbrook School	Mariana Pandi mariana.pandi@dslondon.org.uk
SENCO for Sudbrook Kinderhaus SENCO for DSL Kinderhaus & Years 1-5 SENCO for Years 6-12	Patricia Casswell Patricia.casswell@dslondon.org.uk Mara Breuninger Mara.breuninger@dslondon.org.uk Anna-Lena Klenk Anna-lena.klenk@dslondon.org.uk
Chair of Governors	Paula Walter paula.walter@dslondon.org.uk
Safeguarding Link Governor	Rachel Bochenski rachel.bochenski@dslondon.org.uk
Local authority children's services:	**Kingston and Richmond** Website: Single Point of Access (SPA) Telephone: 020 8547 5008 Out of hours (emergency): 020 8770 5000
Kingston and Richmond's local authority designated officer (LADO) service	Email: LADO@achievingforchildren.org.uk Telephone: 07774 332675 Online: LADO referral form
Kingston and Richmond Safeguarding Children's Partnership (KRSCP)	Email: lscb-support@kingrichlscb.org.uk

4. The law (legislation) and statutory guidance

In addition to KRSCP's arrangements, which can be accessed here, and the London Child Protection Procedures and Practice Guidance, The School also follows the laws and statutory guidance below:

Keeping children safe in education statutory guidance from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

Statutory framework for the early years foundation stage (EYFS), sets the standards that all early years providers, such as nurseries, must meet to make sure that children learn and develop well and are kept healthy and safe. It includes the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 set out who is disqualified from working with children.

Working together to safeguard children 2026 produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

Education Act 2002 / The Education (Independent School Standards) Regulations 2014 / Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 places a duty on independent schools to keep children safe and promote the welfare of children.

The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.

The Children Act 1989 Care Planning, Placement and Case Review sets out what responsibilities education settings have for children looked after by the local authority.

https://www.gov.uk/government/publications/children-missing-education/children-missing-education-statutory-guidance-for-local-authorities-and-schools sets out the rules and duties for local authorities and schools in England to find and support children who are not getting a proper education.

Prevent duty guidance. sets out how specified public authorities must have due regard to stopping people from being drawn into terrorism.

The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European

Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.

The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children -or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

Further, and more specific, legislation is covered throughout this policy in the relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we need to make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding, but some staff members have specific safeguarding roles. An overview is listed below, but it is not exhaustive.

The Governing Board

The board sets out the roles, responsibilities and legal duties for governing boards. The board is responsible for ensuring that:

- safeguarding and the child's best interests, wishes and feelings, are considered in everything The School does
- The School is promoting an inclusive, anti-discriminatory culture where discriminatory behaviour is recognised, challenged and addressed as part of its safeguarding responsibilities
- there is a whole school approach to safeguarding that everyone is involved in and online safety is a theme throughout
- school policies, procedures and training follow the law and align with the local safeguarding children partnership's arrangements

- The School’s leadership team is held to account for the impact and success of The School's safeguarding arrangements
- a safeguarding self-audit is submitted to the KRSCP annually
- safeguarding is a standing item on the agenda for governor meetings
- they appoint a DSL with the appropriate skills and experience who is given the additional time, funding, training, resources and support needed for the role
- they appoint a designated officer for looked after children
- they appoint an experienced governor to take leadership responsibility for safeguarding on behalf of the board (known as the safeguarding link officer)
- all staff have the relevant skills, training and awareness to keep pupils safe
- a sufficient number of staff have the necessary first aid and paediatric first aid training
- all governors receive appropriate safeguarding training at induction, which is regularly updated, and have read the full KCSIE guidance, the EYFS Framework and this policy.
- they monitor how The School is supporting its pupils with regard to their protected characteristics
- there are effective and robust safer recruitment practices in place
- The School works with external agencies to safeguard children and promote their welfare by sharing information and taking appropriate action in a timely manner
- child protection files are maintained as set out in Annex B of KCSIE
- there are procedures for preventing, reporting and managing safeguarding concerns about adults who work or volunteer at our school
- children are taught how to keep themselves and others safe, including online
- strong IT infrastructure is in place, including filtering and monitoring systems that limit children’s exposure to online risks when using the school’s network and devices, alongside cyber security measures that protect children’s personal information
- arrangements are in place to keep children safe when the site is being hired/let

The safeguarding link governor, Rachel Bochenski

- acts as the board’s safeguarding specialist

- has received the appropriate training to equip them with the skills to identify if there are areas of weakness in our safeguarding arrangements and drive improvement
- regularly visits The School, meets with the safeguarding team and collects evidence to test and assure the board that our safeguarding policies and procedures effectively keep children safe
- is part of the annual safeguarding audit, led by the DSL and make sure it is submitted to the KRSCP
- feeds back their findings to the governing board following school visits and meetings with the safeguarding team
- keeps up to date with the KRSCP safeguarding arrangements and guidance.

The Senior Leadership Team (SLT)

- has day-to-day responsibility for The School, which includes responsibility for safeguarding
- ensures the DSL has sufficient time, training, support and resources to carry out the role
- ensures there is a well-equipped safeguarding team to cover the DSL's responsibilities if the DSL is absent or unavailable
- makes sure that staff are recruited safely and receive a good induction and safeguarding training
- makes sure that this policy and other safeguarding-related policies, such as the behaviour policy, are shared with all staff, including temporary staff and volunteers, at induction
- ensures The School's safeguarding policies and procedures are understood and followed by all staff
- makes sure that parents and carers are aware of this policy and know how to access the policy
- ensures that visitors are appropriately supervised or escorted, where necessary
- makes sure there are enough staff per child (child ratios), where relevant and applicable
- ensures that each child in the Early Years Foundation Stage is assigned a keyworker
- becomes the 'case manager' when a staff member's behaviour raises concerns about their suitability to work with children and keep them safe

- works with the DSL to create a culture of openness and regular opportunities for pupils, parents and staff to share their views and shape how The School keeps pupils and staff safe
- updates the board on how well we are keeping children safe, what safeguarding issues children are facing and how we are addressing concerning trends
- enforces a mobile phone-free environment for pupils by default
- addresses issues with site security and develops the school's response to critical incidents and external threats to The School

The designated safeguarding lead (DSL) - Susanne Gause-Batra for the German School and Mariana Pandi for Sudbrook School

- have the lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place
- are always available during school hours for staff to discuss any safeguarding concerns and is the point of contact for safeguarding partners
- arrange appropriate cover for any out of hours/out of term activities
- link with KRSCP to keep up to date with the local safeguarding arrangements and training offer, and attend the termly KRSCP DSL forum
- refer safeguarding concerns to appropriate and relevant external agencies in line with data protection laws, supporting staff who make referrals directly
- ensure that all adults who work in or for The School have an adequate and appropriate safeguarding induction and understand and confirm the reading of this policy and the relevant part of KCSIE and EYFS Framework.
- make sure that all staff and parents/carers have access to this policy and that the policy is reviewed annually
- develop staff's expertise, provide them with advice and support and may consult with them and wider professionals when deciding whether to make a referral
- keep the SLT informed of safeguarding issues
- work with the SLT to promote the educational outcomes for children who have involvement from safeguarding partners and reduce the increased risk of harm to vulnerable children
- work alongside the governing body and the SLT to update and review procedures and how they are being implemented
- complete an annual safeguarding self-audit together with the governing body and SLT, which is submitted to KRSCP

- work with the ‘case manager’ and LADO for child protection concerns that involve a staff member
- contribute to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies
- work together with families who may be facing challenging circumstances and make the school’s parent community aware of our duty to make a referral to children’s services when a child is at risk of or has experienced harm
- encourages a culture of listening to children, taking into account their wishes and feelings when any plans or measures are put in place to protect them
- make sure child protection files are kept up to date and transferred appropriately
- work with the board to review this policy annually, submit an annual self-audit to KRSCP and review the effectiveness of the school’s safeguarding arrangements

Deputy designated safeguarding lead(s) - Andrea Jansen van Rensburg (The German School) and Patricia Casswell (Sudbrook School)

- are trained to the same standard as the DSL
- support the DSL with their role and will deputise on the DSL’s responsibilities if they are unavailable or absent

More details of the DSL’s and deputy DSL’s responsibilities can be found throughout this policy, in Annex B of KCSIE and their job descriptions.

All school staff

- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the Code of Conduct (staff behaviour policy)
- sign to confirm they have read this policy and the relevant part of KCSIE and/or the EYFS Framework annually
- know it is everybody’s responsibility to create a culture and provide a safe environment for children to learn and speak out about their concerns
- will follow the school’s procedures for reporting safeguarding concerns quickly and confidentially asking for support from the DSL if they are unsure
- will, where necessary, refer or support a referral of safeguarding or child protection concerns to external agencies, such as the police, children’s services or the LADO
- make sure children who identify as lesbian, gay, bisexual or transgender have a safe space to share their concerns

- should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

IT Team

- maintains the school's filtering and monitoring systems and ensures they remain operational and up to date
- regularly checks the effectiveness of filtering and monitoring controls
- provides regular filtering and monitoring reports to the IT Committee
- takes appropriate action in response to concerns, incidents, alerts, or issues identified through system checks
- promptly escalates safeguarding concerns identified through monitoring to the appropriate safeguarding staff
- works with the Designated Safeguarding Lead (DSL) and school leadership team to ensure filtering and monitoring arrangements continue to meet the school's safeguarding requirements

6. Managing safeguarding concerns about a child

Identifying a child who may be in need of support or protection

Relevant staff are trained to recognize non-verbal indicators of abuse and neglect, as children who cannot talk or have speech, language, and communication needs face a significantly higher risk of maltreatment. It is essential that children, who are able to, can tell us how they are feeling and know we will take their concerns seriously. We aim to create an environment full of 'reachable moments' that encourages children to feel safe enough to open up about their concerns. The School has systems in place for children to confidently report abuse. The names of the DSL and deputy are clearly advertised in The School. Children can confidently report any worries they have by:

- speaking to a safe adult
- provision of worry boxes
- provision of a QR code for students from Year 9 and upwards, who have access to a school iPad

The School knows that disclosing harm requires immense courage, making a positive first interaction with a safe adult crucial. Staff are trained to handle disclosures sensitively and non-judgementally. They will reassure the child that they

have done the right thing; while explaining they cannot promise secrecy if it impacts their safety or wellbeing as information must be shared with those who can help. Staff know the importance of sharing any information that might help build a picture of what is happening for a child, no matter how small the concern may seem, only involving those who need to be involved.

Disclosures are only one method used to identify children who may be in need of support or protection. Staff are trained to stay alert to other indicators like shifts in behaviour, attendance, or physical and emotional wellbeing. Monitoring behaviour and presentation is particularly vital for pre-verbal children or those with communication differences for us to understand their lived experience. We adopt a safeguarding-first approach to behaviour concerns, considering if the child is communicating an unmet need or whether they are experiencing harm.

Responding to concerns about a child's welfare

Staff know the importance of identifying and sharing concerns as soon as a problem becomes visible so we can provide support to families to reduce the chance of a problem getting worse. We are aware any child may benefit from early help, but staff who work directly with children will be particularly alert to circumstances that potentially increase the need for early help.

Staff will follow this policy if they have a concern about a child, speaking to a member of the safeguarding team as soon as is practically possible. We clearly advertise the names of the DSL and deputy DSLs around The School. A member of the safeguarding team should always be available for staff to discuss safeguarding concerns. We will have cover arrangements in place if the DSL is unavailable due to illness, leave or other circumstances.

The safeguarding team will make sure there is no delay in responding to safeguarding concerns. Staff will record a written account of their concern on CPOMS. The DSL or their deputy decide on the appropriate course of action based on locally-set thresholds and with guidance from the neglect toolkit where neglect is suspected. The options available to them include arranging community-based early help support, requesting targeted early help level support from the local authority's Family Help service, or making a referral to statutory children's services for child in need (CIN) or child protection support. The police will also be contacted if necessary. We have a duty to share information and work together with relevant external agencies to ensure a child's safety and welfare.

The School may take the lead in organising non-school services to provide early help support for the family. Early help support will be kept under constant review. We will consider making a referral to children's services if the child's situation doesn't appear to be improving or is worsening, however we will continue to provide support and contribute to assessments and plans organised by children's services.

If we believe that a family needs targeted early help to meet multiple and/or complex needs, we will recommend to the family that they accept support from the local authority's Family Help team where a qualified lead practitioner will put a plan in place to support the family. Early help services require the family's consent to receive support and their services.

We will make an immediate referral to children's services, and if appropriate the police, where we believe a child is suffering, or is likely to suffer harm. The safeguarding team will seek advice from children's services whenever they are unsure if the threshold for a referral has been met. If a referral is needed, then a member of the safeguarding team should make it. Referrals to children's services will be made through the relevant local authority's procedures who will then make a decision about next steps and the type of response required. The police will notify The School of any domestic abuse incidents they attend that concern a pupil under the Operation Encompass duty.

We will call the police on 999 if we believe an individual is in immediate danger. The School will also inform the police if we become aware that a crime has been committed. We are aware that children can be criminalised for actions they take whilst under coercion, such as actions they take while being exploited, abused or trafficked. We will treat these children as victims recognising that they are also vulnerable and experiencing abuse. Staff will report concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team who will assess the risk, take appropriate action and, depending on the risk, put a safety and support plan in place. The School will follow local School Related Weapons or Potential Weapons Incidents Protocol.

If in exceptional circumstances the DSL is unavailable for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform a member of the senior leadership team (SLT) or themselves seek advice from children's services. Anyone, including children, can make a referral. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with them and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team as soon as is practically possible.

If after a referral, we are dissatisfied with the response from our safeguarding partners and/or the child's situation does not appear to be improving, the referrer will press for re-consideration to ensure their concerns have been addressed and, most importantly, the child receives the support they need. The safeguarding team will use the local resolving professional differences procedure where necessary. The safeguarding team meets regularly to monitor children who we are concerned about to make sure each child's situation is improving in good time and the right support is in place to meet their needs and address our concerns.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. We ask our staff to approach our safeguarding team if they need any support during or following a safeguarding incident.

Confidentiality and information sharing

Personal information about children and their families will be processed fairly, lawfully, and securely. Data protection laws tell us how to protect personal data and give us legal powers to share information to keep children safe and promote their welfare. Staff receive regular data protection training where we make them aware of their duty to receive and share safeguarding information confidentially. This means

only with professionals who need to know to keep the child safe, such as the DSL, children's services or the police.

We will share important information as soon as possible whether that's within The School or with outside partners, such as children's services, so we can quickly get the right support sorted out. We work transparently with parents wherever possible, informing them of our duty to share information and refer suspected abuse or neglect to external agencies. While we seek consent from parents when safe and appropriate, we will share information without consent if necessary to safeguard a child, such as when obtaining consent is impossible, cannot be reasonably expected, or would place the child at risk.

Record keeping

The DSL is responsible for keeping detailed, accurate and secure written records of safeguarding concerns, discussions, decisions made (including the rationale for those decisions), and the outcome. This will include instances where the decision is made that a referral to another agency is not necessary. Safeguarding concerns and referrals are kept in a separate safeguarding file for each child on CPOMS. Access is limited to those who need it.

When a child leaves our school, the DSL will ensure safeguarding information is transferred to the new school or college and within 5 days for an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from the main pupil file, and a confirmation of receipt will be requested and kept under the child's name on CPOMS. Where appropriate, the DSL will share additional information in advance of a child leaving, particularly where the information would support an assessment of risk to others as well as the individual pupil and help the setting put in place the right support.

When a child starts at our school, we will review any safeguarding information provided making sure key staff are aware of the risk and need as soon as possible.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'. FGM is illegal in England. As with other safeguarding concerns, staff will speak to the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM. If a teacher (i.e. an individual who is employed or engaged to carry out teaching work in our school) comes to know in the course of their work that a child has experienced FGM they must directly report it to the police. Failure to do so will result in disciplinary sanctions.

Concerns about extremism and radicalisation

The School complies with the Prevent duty, a legal requirement that obligates agencies including schools to prevent people from becoming terrorists or supporting terrorism. We recognise our role in protecting individuals from extremist ideologies and intervening early to prevent radicalisation. The School undertakes a Prevent duty risk assessment to assess the risk of children being drawn into terrorism, including online, which is informed by the local profile and context.
Protecting children from extremism and being drawn into terrorism is treated the same as any other safeguarding harm. Staff will be alert to changes in a child's behaviour which could indicate that a child may be in need of help or protection. They will report any concerns in line with the school's safeguarding procedures detailed above.

The DSL will follow the local Prevent referral pathway where they become aware of a Prevent concern. They may first seek advice from the local council's Prevent lead and children's services. If appropriate, they will make a referral to the police Prevent team who will consider with other agencies whether the child would best be supported under the Channel programme. The DSL will report knowledge of online material promoting terrorism or extremism via the Government's service.

Kingston Prevent referral pathway OR Richmond Prevent referral pathway

Pupils will be provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views. We are responsible for the content and messaging delivered to our pupils. We will ensure that any external speakers, resource materials, or learning tools do not undermine core British values, which include democracy, individual liberty, the rule of law, and mutual respect and tolerance for those with different faiths and beliefs. Promoting these values helps us defend children against extremist ideologies while building a more united and harmonious community.

Concerns about mental health

If staff are concerned that a child's mental health is also a safeguarding concern, they will speak to a member of the safeguarding team as per this policy. We will consider whether support from the Child and Adolescent Mental Health Service (CAMHS) is necessary. If we feel that a child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, we will seek advice from NHS 111 online or call 111 and select the mental health option.

Child-on-child abuse, including harassment and violence

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen at school, outside of school or online. Staff are made aware of the important role we have to play in preventing child-on-child abuse and responding when we believe a child may be at risk. For some (but not all) forms of

child-on-child abuse it is more likely that girls will be victims and boys the instigators, but we make it clear to pupils that all child-on-child abuse is unacceptable behaviour, we will take it seriously and how they can report to us that they have experienced or witnessed it.
We do not downplay any form of child-on-child abuse. Staff are trained to challenge inappropriate behaviour between children that is abusive in nature. Our staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. We all maintain an attitude of 'it could happen here'.

Examples of child-on-child abuse can include, but are not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- abuse between children in an intimate relationship (teenage relationship abuse)
- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

Child-on-child abuse is preventable. The School puts measures in place to minimise the risk of child-on-child abuse, including:

- ensuring staff are thoroughly trained to recognise the signs that a child is or may be experiencing it, challenge inappropriate behaviour between children and follow the school's procedures for reporting and responding to it
- creating opportunities to teach children how to keep themselves and others safe, including how to respect each other, deal with conflict and how they can confidently report inappropriate or abusive behaviour

- having a transparent behaviour policy that makes clear our expectations for behaviour and mutual respect, as well as the procedures for responding to unacceptable or abusive behaviour
- regularly analysing safeguarding data on child-on-child incidents to identify emerging risks and trends for pupils, particularly children with protected characteristics, taking action to make The School site safer
- being particularly alert to when children might be at highest risk around the school day (for example immediately after school)
- offering opportunities to gather feedback from pupils and their parents about what more we can do to make our school a safer environment for them.

Responding to allegations of child-on-child abuse

Staff will report concerns or confirmed incidents of child-on-child abuse using the school's safeguarding reporting and recording procedures described above. The DSL will determine the best course of action from the available options ranging from internal management of the concern to making a referral to children's services and/or the police. We will inform the police if a criminal offence is committed. The police take a welfare approach to children under the criminal age of responsibility who are alleged to have caused harm. The DSL will work closely with the police to ensure the decisions The School makes to protect children and about discipline does not impact the criminal process.

Records will be kept of all concerns, how they were investigated and any outcomes reached on the child's safeguarding file. The DSL will contact the parents of children involved at the earliest opportunity so long as it is appropriate to do so. Where the DSL, children's services and/or the police decide the concern should be handled by The School internally, we will thoroughly investigate the concern following our behaviour policy and safeguarding processes.

If a safeguarding risk is established, the DSL will assess the necessity of a safety plan or risk assessment in consultation with the external agencies involved. Individual safety plans will be subject to regular monitoring and will include input from both the pupil concerned and their parents. The course of action taken by The School for each child will be discussed solely with that child's parents.

Child-on-child abuse is a safeguarding issue for both children who display the behaviour and the children who are affected by it. Support will be extended to every child affected by the incident.

Harmful sexual behaviour, including harassment and/or sexual violence

Harmful sexual behaviour exists on a continuum (see diagram below). Our safeguarding team will have a good understanding of harmful sexual behaviour to inform how they respond to concerns, support staff training. Aspects of preventing harmful sexual behaviour are embedded across regular lessons and targeted safeguarding workshops offered to specific year groups.

We will always consider harmful sexual behaviour in a safeguarding context. Staff are made aware of the importance of addressing the early signs of inappropriate sexual behaviour, including misogyny, to prevent it escalating into sexual violence and/or sexual harassment.

Hackett continuum of sexual behaviour tool

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviours Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking, or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator Sadism

The School knows that sexual violence and sexual harassment can happen between two children of any age or sex, online or in person. It can occur also through a group of children to a single child or towards another group of children. We will not dismiss sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”, because this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in the worst-case scenario normalise abuse and stop children from coming forward to report it.

Responding to allegations

When responding to harmful sexual behaviour, including sexual harassment and sexual violence, The School follows the guidance set out in Part Five of KCSIE. We treat incidents that occur online or outside the school setting with the same gravity as in-school incidents. All incidents are responded to using the thresholds set out in the Hackett tool, drawing upon the DSL’s professional judgement and following local safeguarding procedures:

Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.

Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.

Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.

Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

Handling cases of harmful sexual behaviour is highly complex. Where appropriate, the DSL will seek the advice of the police and/or children's services to decide next steps and what information can be disclosed to others, in particular the child alleged to have caused harm, their parents and staff. The DSL will also consider which specialist services are best placed to support the children involved.

When assessing incidents of harmful sexual behaviour, we will take into account the ages and developmental stages of the children involved. Any power imbalance between children, such as differences in age, maturity, social status and if any of the children have a disability or learning difficulty, will be taken into account. We will consider whether immediate measures need to be put in place to support and protect the children impacted by harmful sexual behaviour, including witnesses and the child who displayed harmful sexual behaviour.

An immediate risk and needs assessment will be carried out and recorded following a report of sexual violence and on a case-by-case basis for reports of sexual harassment. The DSL will regularly review the assessment, using it to inform ongoing safeguarding decisions. At all times, we will be actively considering the risks posed to all pupils and staff and put adequate measures in place to protect them and keep them safe. Our risk assessment will support and be informed by risk assessments carried out by other professionals involved.

Our staff know to reassure any child who reports they have been a victim of sexual violence or sexual harassment that they will be taken seriously, supported and kept safe. We will further reassure those affected that the law exists to protect children, not criminalise them. Experiencing sexual violence and sexual harassment will, in all likelihood, negatively affect a child's educational attainment and be worsened if the child who caused the abuse attends the same school. We will work hard to minimise the impact on their educational outcomes. Wherever possible, the child, if they wish, will be able to continue in their normal routine. Our priority will be to make the child's daily experience as normal as possible, so that our school is a safe space for them.

The School recognises that children who display harmful sexual behaviour may have experienced their own abuse and trauma. At the same time as considering disciplinary action, we will provide the child with, or find, the right support to stop them from re-offending and address any underlying trauma that may be causing their behaviour. In all scenarios, decisions and actions are regularly reviewed and relevant policies are updated to reflect lessons learnt.

Balancing confidentiality requests with safeguarding duties

The DSL will give the child affected by harmful sexual behaviour as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered. If the child asks for confidentiality and opposes a referral being made to external services, the DSL will assess the situation case-by-case, balancing their wishes against the school's duty to protect them and others. A referral should be made to children's services if a child has suffered harm, faces a risk of harm, or is in immediate danger. Additionally, reports involving crimes such as rape, sexual assault, or assault by penetration should be reported to the police. Decisions to refer against the child's wishes will be handled with care.

If an allegation of sexual harassment or sexual violence enters the criminal justice system, the DSL will have a general understanding of the criminal process, witness support, and the importance of anonymity requirements. Every reasonable effort will be made to safeguard the anonymity of all children involved in a report. This includes evaluating what information staff members need to know and establishing appropriate support. The School will also consider the role of social media in spreading rumours and potentially exposing a child's identity.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person making the allegation needs support or may have been abused by someone else, and this was a cry for help. If so, a referral to local authority children's services may be appropriate. If a report is proven to be deliberately false or malicious, we will consider taking action against the individual in line with our behaviour policy.

Concerns about the sharing or making of nudes or semi-nudes

For the purposes of this policy, 'sharing or making nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another person. Images may be digitally altered or wholly generated using artificial intelligence, usually referred to as 'deepfakes'.
Our staff will be trained to carefully handle and manage reports of these incidents. Staff reserve the right to confiscate a device in the possession of a child if they have concerns that the device is involved in the sharing or making of nudes or semi-nudes. This is consistent with the Searching, screening and confiscation: advice for schools guidance. Staff will not view, download, forward or delete illegal images of a child. Staff will be aware of what to do when viewing an image is unavoidable.

Incidents will require a proportionate safeguarding response, regardless of whether they are consensual or not, that considers any elements of coercion, exploitation or

vulnerability. The DSL will first hold an urgent meeting to establish, among other things, the level of risk to the children involved, if a referral is needed in line with our safeguarding procedures, whether there is a need to view the image to safeguard the child and whether action should be taken to delete or remove the image. The review meeting will likely include the staff member(s) who heard the disclosure and the wider safeguarding team.

The decision to view and delete imagery will be based on the professional judgement of the safeguarding team, guidance from the police (where necessary) and in line with the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance.

The DSL will make an immediate referral to the police and children's services if:

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the image suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
- the images involve sexual acts and any child in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming
- they become aware of a computer-generated explicit image of a child

It will not always be necessary to involve the police or children's services. In these cases, the DSL will be confident that they have enough information to assess the risk to any child involved and that the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support. We may escalate the concern to safeguarding agencies later on as a result of becoming aware of further information or wider concerns.

Discrimination

We recognise that discrimination is a harm in its own right. It can cause trauma and negatively impact a child's welfare, wellbeing, sense of belonging and safety. Some pupils face greater risks of harm or bullying from issues like sexual violence or homophobic, biphobic, transphobic, faith- or race-based discrimination. Children may also be targeted due to their perceived or actual LGBTQ+ identity. We have a duty to protect individuals from and eliminate unlawful discrimination, harassment and victimisation. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for everyone.

This is part of the school's duty to promote an inclusive, anti-discriminatory culture as part of our safeguarding responsibilities. This duty is a priority when making policies and decisions that impact our school community. The School works hard to foster a sense of belonging for all pupils, creating opportunities to celebrate diversity through our curriculum and wider school activities. We know that taking timely action helps prevent concerns from escalating into bullying.

We aim to provide a safe, open space for our community to share concerns. Discrimination is firmly addressed under our safeguarding procedures and behaviour policy and may involve referrals to children's services and/or the police. We will communicate with parents in line with this policy. Support and check-ins will be offered to the pupil who has been targeted. We challenge discriminatory attitudes, making it clear this behaviour is unacceptable. Pupils who discriminate against others face clear consequences and receive the support and education they need to reduce the risk of this behaviour happening again. We report all discrimination incidents, including those not involving children, to the local authority termly.

7. Specific safeguarding considerations

Certain children are at a higher risk of experiencing abuse, whether online or offline, and may face further obstacles in identifying or reporting it. For this reason, there are some circumstances we give a specific safeguarding focus to.

Children who need a social worker

The School recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm and face additional barriers to attendance, learning, mental health and behaviour. Children may need a social worker to help the family address safeguarding risks or welfare needs. Children's services will tell The School if a pupil has a social worker. This helps us to make decisions in the child's best interest, such as how we adjust our response to unauthorised absence or the child missing education. We will work with the social worker, the child, and their family when deciding on the extra help we can provide in school to support the child's welfare.

Children looked after and previously looked after

Staff will have the skills and knowledge to keep children looked after and previously looked after safe. We will give appropriate staff the information they need in relation to a looked after child, for example their legal status, who has parental responsibility, who is not permitted to have contact, who is not permitted to know where the child is being educated and the level of decision-making power the local authority has given the carer.

The designated officers for looked-after children, Susanne Gause-Batra (The German School) and Mariana Pandi (Sudbrook School) have the training and experience to understand the unique needs of these children and how they can best be supported to have the same opportunities as their peers. This will include the designated officer working closely with AfC's Virtual School accessing the training

and forums on offer. The designated officer will also work closely with the children's services and Virtual School involved to put funding to best use to improve the child's educational outcomes. The designated governor for children looked after is Rachel Bochenski.

Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to. We encourage kinship carers of pupils to make The School aware of their caring arrangement so we can establish whether there is any support we can offer or seek advice for.

Private fostering occurs when a child under 16 (or 18 if disabled) is cared for by someone other than a parent or close relative for 28+ days. By law, those arranging this care must notify children's services as soon as possible. If they haven't, The School has a duty to inform children's services, though we also encourage parents to report it.

Young carers

The School is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, academic achievements, behaviour and wellbeing. We aim to identify young carers early, so we make sure young carers receive the right support at the right time by the right services. This may include additional support from safeguarding partners, including the local authority and health services.

Children requiring mental health support

At The School, we promote mental health and wellbeing. We provide a range of supportive activities and initiatives, for example wellbeing ambassadors, an annual Mental Health Week, a breakfast club and regular meditation sessions, to help children build resilience, access peer and staff support, and help develop positive wellbeing habits. Children from Kinderhaus to Year 12 can access mental health first aid onsite.

Our Mental Health Lead is Anna-Lena Klenk (anna-lena.klenk@dslondon.org.uk) as Coordinator of the Pastoral Care Team.

Our staff are aware that mental health problems can develop into safeguarding concerns and can also be an indicator that a child is experiencing or at risk of experiencing harm. Staff are well placed to observe children day-to-day and identify early those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are aware that only appropriately trained professionals should attempt to diagnose a mental health problem.

Children with special educational needs, disabilities and health issues

Our SENCOs and DSL work closely together to safeguard children who have special educational needs and disabilities (SEND), particularly when there is a report of abuse. The School makes sure that staff are aware that children with SEND or

certain medical or physical health conditions can face additional safeguarding challenges, both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours, such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- the need for intimate care or that these children are isolated from others, and that these children are more likely to be dependent on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We will consider additional pastoral support for these children and ensure we put appropriate measures in place to best support communication. We will make a referral to children's services where an incident highlights that a child might be at increased risk of harm because of their medical condition, for example if the child is repeatedly sent to school without essential medication. Usually, we expect a child's reported medical needs to be verified by UK medical professionals.

Children who are absent from education

The School recognises issues with attendance can be a warning sign to a range of safeguarding issues and/or worsen existing safeguarding concerns. The school's attendance procedures assist the safeguarding team with identifying and responding to children persistently absent or missing from education, acting early to prevent absent children from becoming a child missing education in the future.
Where a parent expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly important for children who have SEND, a social worker and/or other vulnerabilities.

Children who are gender questioning

This section applies where a child or their parent has requested that The School make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). The KCSIE guidance states what our

responsibilities are in this area and what we should consider when making decisions about a request, particularly in relation to single-sex sport and spaces and residential accommodation. We will keep a clear record of our decision-making.
The School will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the latter is unsafe to do so), considering clinical evidence or advice and involving the DSL. The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

8. Online safety and the use of smart devices

This section summarises the school's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our E-safety policy and school rules policy understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is:

- making sure our whole school approach is reflected in all relevant policies
- annually training staff on online safeguarding risks and how to protect children
- Ensuring that children, staff and parents sign an accessible Acceptable Use Agreement that sets out expectations for the use of the school's IT systems and the consequences of failing to comply
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety (e.g. through student workshops on online safety and cybercrime)
- engaging parents with keeping children safe online (e.g. through an annual online safety workshop for parents)
- making parents, children and staff aware that staff can search an electronic device they have confiscated
- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices, these systems are checked quarterly by IT

Technology and risks and harms associated with it evolve and change rapidly. We will carry out an annual review of the school's approach to online safety, supported by risk assessments that consider and reflect the risks our pupils may face.

We consider online safety and the four main categories (4Cs) of online risk when making decisions for our school:

Content: exposure to illegal, inappropriate or harmful content, for example pornography, discrimination, self-harm, suicide, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this, for example peer to peer pressure, and adults posing as children with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including those generated using AI and online bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Mobile phones and smart technology (including smart devices)

The School aims to restrict mobile phone use within The School as much as possible.

Whilst on school grounds, parents are only allowed to use their mobile phones at the reception area of Douglas House.

Visitors and parents of the Kinderhaus, who spend more time in the setting during the settling in process or visiting the setting are asked to leave their phones at the entrance/reception in a designated box after signing in as visitors.

All staff employed at the Kinderhaus must not use their mobile phones while working with children. They should leave their phones in designated places during the working day. Staff can access their mobile phone during emergencies and during their break time in designated spaces. Bluetooth functionality must be turned off to disable Smartwatches. A school mobile phone will be provided for emergencies.

Only the school's iPad must be used to take photographs of children. Those are used for children's progress reports, learning journals and display purposes.

Staff employed in years 1 to 12 and other parts of The School are expected not to use personal mobile phones in the presence of children, unless this is absolutely necessary in the duty of their work. The iPad and other school authorised devices should be used.

Kinderhaus children should not bring any digital devices to school. We make sure they cannot access the internet whilst in our settings in any way. The School pays regard to the Screen Use guidance published by the government for children aged 0-5 years, including the impact of screen time on children's health, development and wellbeing.

Children from year 1-4 should not bring any digital devices to school. They have moderated access to school controlled digital devices as part of the curriculum.

Children from year 5-10 should not bring any digital devices to school; if they do, they must lock their smartphones in pouches and must not access them at any time during the school day, including field trips. There are special circumstances where there are exceptions to this rule, such as if a child requires their mobile phone to monitor a medical need. They have moderated access to school controlled digital devices as part of the curriculum. Where they have been given personal digital devices their use is governed by the Acceptable Use of iPads agreement.

Children in year 11 and 12 are allowed to use their personal phones in designated areas as specified in the Hausordnung.

Media recordings, including audio, images and videos

When we make media recordings of pupils, such as taking videos or photos, we will get the child's and/or their parents'/carers' consent, make sure the pupil is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

We make careful decisions about how and where we publish images, videos and recordings of children online, recognising the increasing risk that individuals can use artificial intelligence to manipulate the image to cause harm.

During performances/assemblies where parents are present, children can be filmed and photos be taken by parents and carers, as long as this has been made clear in advance, but these images are strictly for personal use only and must not be shared on any online platform. Further details are available in the school's data protection notices.

Filtering and monitoring systems

To limit children's exposure to online risks from the school's IT systems, we have strong and effective filtering and monitoring systems in place, following the government's Meeting digital and technology standards in schools and colleges and Generative artificial intelligence (AI) in education - GOV.UK guidance.

We will make sure that

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our governing body reviews the systems with the DSL, IT staff and service providers.
- the systems are effective for the age range of children and consider children potentially at greater risk of harm

- when we block online content, it does not impact on teaching and learning
- filtering works across all devices including mobile phones and smart technology
- measures are in place to protect personal information and ensure appropriate cyber security systems are in place.

Remote education

We will stay in regular contact with the parent of a pupil being taught remotely, making sure they are aware of:

- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use
- what their child is being asked to do online, including the sites they will be asked to access and who from The School their child will be interacting with online

Information security and access management

We understand that cyber security is a safeguarding issue, particularly because we hold sensitive data about pupils and staff. We will take measures to help keep personal information safe, ensuring we have appropriate cyber security systems in place to help protect against cybercrime (i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly). We will follow the government's Cyber security standards guidance. Our systems are reviewed regularly to keep up with the constant changes to cybercrime technologies.

9. Adults who work with children or at our school

Safer recruitment

The School expects all staff, volunteers and third parties who spend time at our school to share our commitment to keeping children safe. We have tight and robust recruitment procedures in place to deter, identify and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities at our school. We will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. All offers of employment are conditional upon the successful completion of pre-employment vetting checks that are listed in Part Three of KCSIE.

Where staff work in the school's early years or provision of care of pupils under the age of eight, The School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment,

and from time to time during employment. This forms part of the school's safer recruitment practices.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

We require written confirmation from third-party and supply staff agencies that they have completed appropriate safer recruitment checks on their employees. We will always check the individual's identification.

We will make sure safeguarding arrangements are in place to keep children safe when activities or services that take place on our site are not provided by our school or under the direct supervision or management of our staff, regardless of whether the children attending are pupils at our school or not. We will end our agreement with the individual or provider if they fail to follow the safeguarding requirements listed in the agreement.

We will also check the suitability and identification of external visitors and individuals or organisations wishing to hire our site. All non-DBS checked visitors need to be escorted by a member of staff during school hours.

Extended school and off-site arrangements

We continue to be responsible for the safety and wellbeing of pupils who attend an alternative provision. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.

We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between The School and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement if safeguarding concerns arise and reserve the right to end the arrangement if concerns are not adequately addressed.

Where extended school activities are provided and managed by The School, our own safeguarding policies and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective safeguarding arrangements and thorough risk assessments are in place.

For visits involving homestays outside of the UK, obtaining criminality information from the DBS regarding hosting adults is not feasible. We will collaborate with our overseas partner schools to ensure a mutual understanding of, and formal agreement on, the safeguarding arrangements established for the trip. If required, we may also reach out to the appropriate foreign embassy or High Commission to explore any viable vetting options for those hosting abroad. Parents will be fully updated on the finalised safety measures.

Concerns or allegations about adults in our school

The School remains vigilant beyond the recruitment and vetting process. We maintain an environment that deters and prevents abuse and challenges inappropriate staff behaviour. This includes creating a culture of openness and transparency so that staff feel comfortable to report staff behaviour that may impact on keeping children safe.
Our staff are trained to identify inappropriate or harmful staff behaviour and the procedures to follow if they have a safeguarding concern about an adult at our school. This includes information about appropriate and inappropriate physical contact between staff and pupils and the strict conditions under which it is appropriate to restrict a child's movement, use reasonable force or seclude a child from others for safeguarding purposes in line with the restrictive interventions guidance.

Staff will report low-level concerns and allegations (that a member of staff presents a risk to children) to the Headteacher or the Commercial Director as soon as practically possible. This includes concerns that occurred in school, out of school, online or offline. Staff are always expected to provide a written account of their concern. If the concern is about the Headteacher or the Commercial Director, staff will contact the chair of governors whose details are at the start of this policy.

If the staff member feels unable to report to the Headteacher or the Commercial Director or governor either because they are not available or because they believe that there is a conflict of interest, they will share their concerns with the local authority designated officer (LADO) whose details are at the start of this policy. The LADO is responsible for giving advice and organising the response to concerns that an adult who works with children may have caused them or could cause them harm.

Appendix C sets out the full procedure for managing low-level concerns and allegations of harm.

10. Whistleblowing

A whistleblower is a member of staff who reports certain types of wrongdoing, and all staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Concerns should first be raised with the senior leadership team who will take them seriously.

There are other options available where staff feel unable to raise a concern with the senior leadership team or feel that their genuine safeguarding concerns are not being addressed.

They can contact the school's Whistleblowing Officer, who is a governor at The School at whistleblowing@dslondon.org.uk or any other member of the governing body.

They can also contact the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk) or call Ofsted Whistleblowing Hotline at 03001233155.

The School has a separate whistleblowing policy that lists our full procedure.

11. Site safety

The School has security measures and response plans in place to keep the site secure and help protect children, staff, volunteers and visitors from external threats to The School. School leaders will organise for regular drills, both with and without pupil involvement, to ensure staff are best prepared to manage a critical incident. Any feedback or concerns raised by pupils, parents or staff regarding areas of the school site where children feel unsafe or at risk of harm will be taken into account and addressed accordingly.

A member of the senior leadership team will make the police aware if we have information of concern about the local area that could affect pupils' safety. If we are concerned about areas where gangs or anti-social behaviour are present, we will also inform the local authority's contextual safeguarding team.

12. Training

The School ensures that **all staff** are trained in line with the criteria set out in KCSIE and EYFS.

The school's safeguarding training will be renewed annually, and The School will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at The School.

Staff who have missed the induction training will be updated at the earliest opportunity. We ensure that all staff are assigned to a Safeguarding online training upon joining The School and annually. Among other things, staff who may support children in early years will be trained to understand acceptable staff ratios, the role of key persons, safer sleep and eating arrangements, appropriate food preparation and management of allergies.

All staff will also receive annual online training. The training provided covers what staff should know as set out in the KCSIE and EYFS statutory guidance. In addition, staff receive regular safeguarding updates, so they have the information they need to keep children safe, as required and at least annually. Staff sign to confirm they have

read and understood Part One of the latest version of KCSIE. Some staff members will be expected to attend additional safeguarding training specific to their roles.

All **governors** receive safeguarding and child protection training at induction that prepares them for testing and challenging the school's procedures and policies making sure they are working as they should be. Their training will be regularly updated. The safeguarding link governor will refresh their knowledge more regularly and receive additional training, so they are equipped for their role and stay alert to changes to the safeguarding context.

The **safeguarding team** will attend regular training to prepare and assist them in leading the school's safeguarding response and strategy. The board will ensure that the training undertaken complies with Annex B of KCSIE and Annex C of EYFS statutory guidance. Additional training or research may be required as local and school-specific safeguarding issues arise. The safeguarding team will attend level 3 multi-agency local safeguarding training and Prevent awareness training within 12 weeks of starting the role that they will refresh every two years.

We make sure that staff provided by external agencies and third parties, for example supply staff or private tutors are aware of this policy, our school's safeguarding procedures and have received appropriate safeguarding training.

13. Teaching and learning

At The School we recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our relationships, sex and health education policy sets out how we do that and our curriculum meets the needs of all children. If specific safeguarding issues arise during the school year, the curriculum will be adapted to cover those issues.

We provide safeguarding workshops for our students with topics relevant for certain year groups. We will vet the external visitors we plan to use to deliver any of these workshops to ensure they are suitable for our school and align with our safeguarding expectations. They will be made aware of the name and contact details of the DSL in case of any disclosures of harm when delivering the workshops.

14. Reviewing our safeguarding processes

At The School we regularly review the success of what we are doing to keep children safe. This includes reflecting on what we can learn from safeguarding concerns and incidents taking any action needed to improve our practice. The impact of safeguarding policies, systems and processes are kept under continual review. We are open to challenge and actively seek opportunities to learn how we can improve. For example, we

- regularly listen to the views and experiences of pupils, staff and parents
- utilise safeguarding monitoring visits from governors
- report the impact of our safeguarding arrangements to the board
- submit an annual self-audit to the KRSCP
- seek external expert advice to help us make decisions

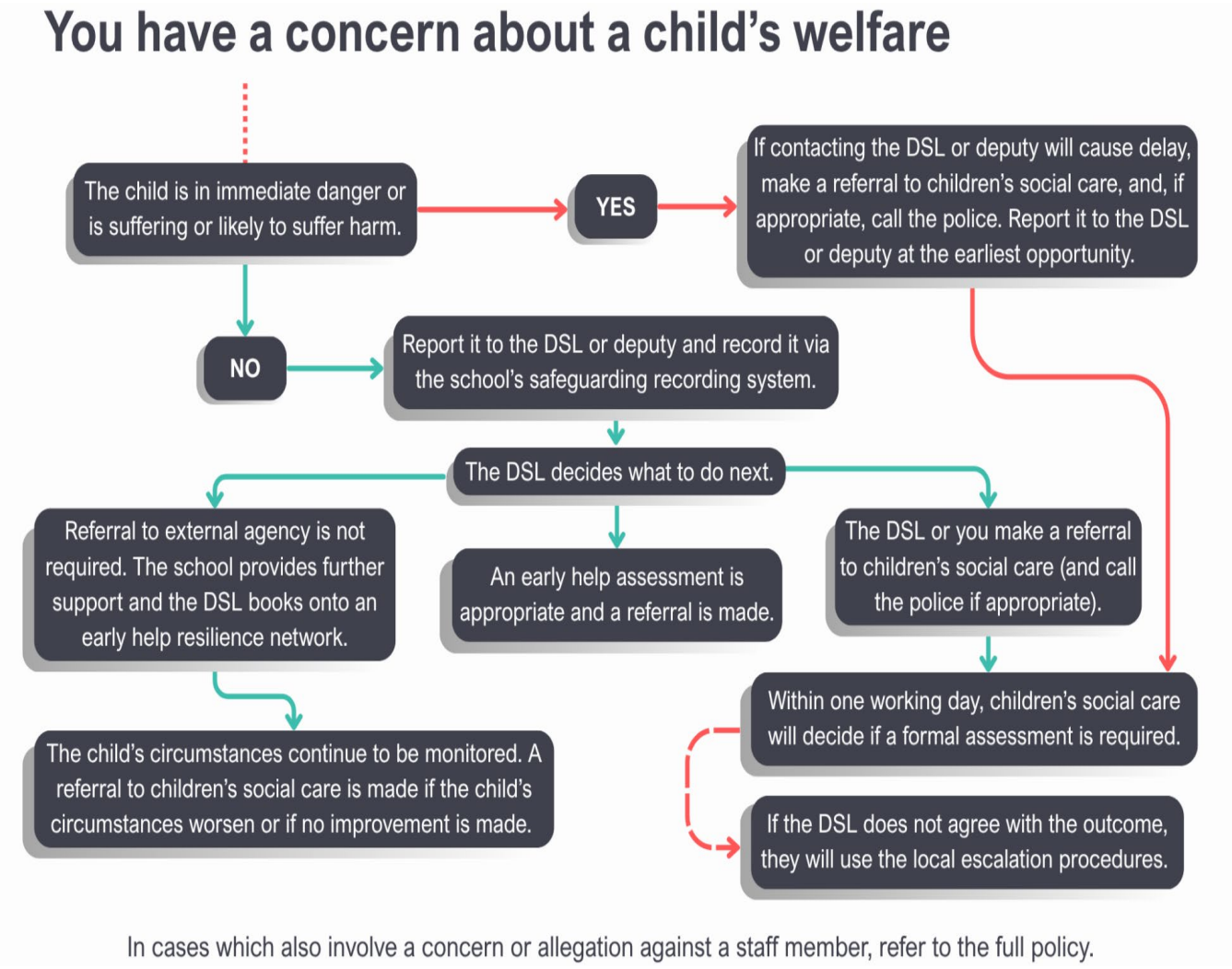
15. Linked policies

This policy is only one of a range of documents that set out what our safeguarding responsibilities are and how we carry them out. This policy is complemented by and should be read alongside the following policies:

- Behaviour / physical intervention
- Anti-bullying
- Staff behaviour policy/code of conduct
- Health & safety
- Attendance
- Curriculum (such as PSHE and RSE)
- Administering Medicines
- First Aid Policy
- Online safety
- IT Policy
- Acceptable Use of iPads
- Safer recruitment and selection (HR08)
- Whistleblowing

Appendix A: Flowchart for responding to concerns about a child

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below.



In cases which also involve a concern or allegation against a staff member, refer to the full policy.

Appendix B: Additional safeguarding information for school staff

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Core external agencies

Local children's services: Achieving for Children (AfC) Single Point of Access (SPA) service

The Single Point of Access (SPA) is a dedicated multi-agency service for managing safeguarding concerns about children. They receive referrals about children and families from partner agencies, such as health, schools and the police, and decide the right outcomes and level of support for them.

This support includes:

- Providing consultations to professionals when they are concerned about a child and seeking advice.
- Making referrals to partner agencies.
- Access to early help services within AfC.
- Making referrals to children's social care services.

Anyone can refer to the SPA service about a child or young person who needs support or protection in the boroughs of Kingston and Richmond. The concern could be about how a child is developing, parenting issues that the caregiver is experiencing, if it is suspected a child is being neglected or subjected to physical, sexual, or emotional abuse. The SPA can be contacted on the Single Point of Access (SPA) website.

If a referral is needed, then a member of the safeguarding team should make it. If in exceptional circumstances the DSL is unavailable for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform a member of the senior leadership team (SLT) or, if needed, themselves seek advice from children's services. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with children's services and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team and recorded as soon as is practically possible.

If a child is in **immediate danger**, the police should be contacted on 999. If it is not an emergency but there is a concern that a child is at risk, the SPA should be contacted by phone on 020 8547 5008. If the concern arises outside of office hours and is urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

If a child is in need of support or protection, but resides outside of Kingston or Richmond the following government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK
Staff can use the "What to do if you're worried a child is being abused" guidance

https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

alongside the school's procedures if helpful. Staff should make a member of the safeguarding team aware if support is needed during or following a safeguarding incident.

Local authority designated officer (LADO)

Every local authority has a legal responsibility to appoint a LADO who is responsible for receiving referrals and organising the response to concerns/allegations that an adult who works with children may have caused a child or could cause a child harm. The LADO will give advice and guidance to employers, for example the headteacher, to make sure allegations are dealt with fairly and quickly and children are being protected.

Anyone can make a referral to the LADO service, however, where appropriate staff should report safeguarding concerns about staff and volunteers following the procedures set out in the school's low-level concern and allegations against staff and volunteers' policies. The LADO service must be informed within one working day of any allegations that come to the school's attention. The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: LADO referral form

Whistleblowing organisations

All staff will be made aware of the duty to 'whistleblow' certain types of wrongdoing. The Department for Education provides a list of complaints that count as whistleblowing. An employee is protected by law if they report any of the following:

- 'a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance
- you believe someone is covering up wrongdoing
- sexual harassment'

Every school should have a whistleblowing policy that details the full procedure. The School aims to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how it manages safeguarding. The School asks staff to first raise their concerns with the SLT who will take them seriously.

There are other options available if staff feel unable to raise a concern internally or feel that their safeguarding concerns are not being addressed. For example, they can make contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk) or contact the Protect organisation for advice.

Kingston and Richmond safeguarding children partnership

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this document, they mean the arrangements agreed and published by KRSCP or the London Child Protection Procedures and Practice Guidance.

Categories of harm

Abuse is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm also includes witnessing the ill treatment of others, for example seeing, hearing or experiencing the effects of domestic abuse. Safeguarding issues are rarely standalone events and cannot be covered by one definition alone. In most cases, multiple issues will overlap. Staff will be aware that technology plays a significant part in many safeguarding issues.

Physical abuse is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning/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 persistent adverse effects on the child's emotional development. It may involve:

- communicating to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- placing expectations on a child that are inappropriate for their age or stage of development, such as having interactions beyond their capabilities, imposing overprotective limits on exploration and learning, or preventing the child from participating in normal social interaction
- experiencing, seeing or hearing the ill-treatment of another

- serious bullying (including online bullying), causing a child to frequently feel frightened or in danger, or
- the exploitation or corruption of a child

Sexual abuse involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence and whether or not the child is aware of what is happening. 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. As stated in the KCSIE guidance, 'There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity'.

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of their 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 caregivers)
- ensure access to appropriate medical care or treatment
- respond or meet a child's basic emotional needs
- provide suitable education

The following guidance is used to help identify and address cases of neglect.

Local partnership guidance, including The Love and Care, Child Neglect Toolkit Handling Cases of Affluent Neglect in Schools

Financial and economic abuse are increasingly recognised as major safeguarding and wellbeing issues directly impacting children and young people. This type of abuse is where someone controls or exploits another person's money, finances, or access to essential resources to gain power over them and may also be an indicator of wider abuse, neglect, or exploitation.

Indicators of abuse

This list provided by the NSPCC covers some common indicators of abuse and neglect:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacking social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which completely cover their body
- patterns of repeated lateness or absence

It is important that staff report all concerns no matter how minor or insignificant they may seem. Staff do not need absolute proof that the child is at risk.

Handling a disclosure

A disclosure refers to when someone shares information about harm or risk of harm. Staff should follow the below guidelines during a disclosure:

- Listen to the child carefully and believe in what they are saying. Do not be afraid of moments of silence.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL. Ask only open questions (e.g., Who?, What?, Where?, When?, How?) or use open prompts such as 'Tell me', 'Describe', and 'Explain'. Otherwise, you may invalidate your and the child's evidence in any later court proceedings.

- Do not examine the child intimately or take pictures if there are injuries or marks on the child. Administer first aid if required.
- Reassure the child that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret but will only pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible.
- Make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with anyone else unless the DSL, children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- Get support for yourself if you need it.

Recording a disclosure or safeguarding concern

- Do not ask children to make written statements themselves or sign records.
- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file.
- If a paper form is being used, sign and date the write-up.

Specific safeguarding concerns

This section is based on the KCSIE statutory guidance which includes further information about specific safeguarding issues schools should be aware of. All concerns under this section should be addressed in line with the school's safeguarding policy.

Child-on-child abuse

Children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. Older children may use a type of child-on-child abuse to push younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child criminal or sexual exploitation firsthand may be forced into encouraging their friends or peers to take part using types of child-on-child abuse. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys the instigators.

Child-on-child abuse can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- abuse between children in an intimate relationship (teenage relationship abuse)
- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

The School does not tolerate child-on-child abuse. Even when there are no reported cases, it could still be happening but yet to be reported. Child-on-child abuse is not downplayed, for example sexual violence and sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe at school, they need to know child-on-child abuse is not acceptable behaviour and how to report it to a safe adult if they are experiencing or witnessing it. Child-on-child abuse is preventable.

Child-on-child sexual violence and sexual harassment

Ofsted's Review of sexual abuse in schools and colleges was carried out as a result of the large amount of testimonies shared on the Everyone's Invited website which highlighted the prevalence of sexual harassment and sexual violence in schools.

National and local research further highlights the prevalence and normalisation of harassment and abuse in school-aged children. Again, no reports does not mean it is not happening here.

Sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online or in person. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Alongside girls, children with SEND or who identify as or are perceived to be LGBTQ+ are at higher risk of sexual violence and sexual harassment. Sexual violence and sexual harassment exists on a continuum and may overlap. It is never acceptable and will not be tolerated.

When a child reports sexual violence or harassment this may only be the start of a larger disclosure that could transpire over time. Part 5 of KCSIE tells schools what they should consider in response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of the child protection policy.

Harmful sexual behaviour (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. HSB is always considered in a child protection context. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma and should be offered appropriate support.

The ages and stages of development of the children involved are considered when responding to incidents. For example, sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. A younger child can abuse an older child, especially if they have power over them, for example if the older child is disabled or smaller in stature.

Useful information:

Local partnership guidance

Centre of Expertise on child sexual abuse: Resources for education settings NSPCC Harmful Sexual Behaviours
Stop it Now

Upskirting

Staff and children should know that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: 'a colloquial

term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission'. Each incident will be assessed individually, with the DSL or a deputy leading the response and applying professional judgement, in consultation with other agencies, including children's social care and the police, as required.

Sharing or making nudes and semi-nudes

Sharing or making nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another person. Images may be digitally altered or wholly generated using artificial intelligence, usually referred to as 'deepfakes' (UKCIS, 2024). It is a form of child sexual abuse. Alternative terms sometimes used by children and young people are 'dick pics' or 'pics'.

All incidents will be treated as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. Although creating or sharing nude and semi-nude images of themselves or other young people is illegal, care should be taken to avoid unnecessarily criminalising children. Children might share nudes because of threats or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will receive something in return.

'Sextortion' is when an individual threatens to share or distribute nude or semi-nude images of another person if they don't do what they ask. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images or money or in some cases finding more victims. The National Crime Agency and CEOP provide alert guidance and support that should be used to respond to incidents.

How to respond to an incident:

- **Report** it to the DSL or a deputy immediately using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery or ask a child to share or download - these are illegal.

- **If you have already viewed the imagery** by accident (e.g., if a young person has shown it to you before you could ask them not to) report this to the DSL and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children who are involved in the incident to disclose information about the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the children it involves or the parents or carers of those children.
- **Do not** say or do anything to blame or shame the children involved.
- **Do** explain to them that you need to report it and give reassurance that this is to make sure the right help and support is provided by the DSL or a deputy.

Contextual safeguarding

Contextual safeguarding, also known as risk outside the home, is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Contextual safeguarding concerns are recorded in accordance with the school's safeguarding procedures. Sharing information about contextual safeguarding concerns in the local area is important for reducing the risk to children. Concerns will be shared with AfC's contextual safeguarding team. If there is a concern about a specific child, children's services will be consulted.

Useful information:

Kingston and Richmond Youth Safety Strategy
Children and Young People's Plan and Needs Assessment
Local partnership guidance
Achieving for Children's Risk Outside the Home page
Tackling Child Exploitation multi-agency Practice Principles

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Different forms of harm often overlap. Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or

affection) and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Both can occur online.

Children can be exploited by adult males or females, as individuals or in groups. They can also be exploited by other children who themselves may be experiencing exploitation. Where this is the case, it is important that the child causing harm is also recognised as a victim. KCSIE reminds us that 'It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them'.

It is essential for staff to be aware of the range of factors that could make a child more vulnerable to exploitation. The following list is of potential indicators of both child criminal and sexual exploitation, including where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional wellbeing
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss education or do not take part in education

Additional support will be provided to children who have been exploited to help keep them in education.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse that can affect any child. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

CSE can occur over time or be a one-off occurrence. It may happen without the child's immediate knowledge, for example through others sharing images of their abuse on social media. CSE covers any child who has been coerced into engaging in sexual activities, including children over 16-year-olds who can legally consent to have sex. Some children may not realise they are being exploited because they believe they are in a genuine romantic relationship.

CSE can involve force or enticement-based methods of compliance and may be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE include children who:

- Are engaging in sexual activities with an older child or believe that they are in a healthy relationship with an adult
- suffer from sexually transmitted infections
- display sexual behaviour beyond expected sexual development
- become pregnant

The London Child Protection Procedures for responding to sexual exploitation guide professionals' responses to concerns. Further information about potential signs that a child is involved in sexual exploitation is available on The Children's Society's website and Home Office's Child sexual exploitation: definition and guide for practitioners.

Child criminal exploitation (CCE)

Children involved in CCE are victims despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. Children may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. CCE can include children being forced or manipulated to:

- work in cannabis factories
- move drugs or money across the country (county lines)
- shoplift or pickpocket
- threaten serious violence to others
- commit vehicle crime

Serious violence

There are many indicators that may signal a child is at risk from or is involved in serious violent crime. These include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a 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 (could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

Staff should be aware of the range of risk factors that increase the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having previously been involved in offending, such as theft or robbery

Being the victim of, carrying out or allegedly carrying out serious violence (e.g., knife crime) may indicate that a child is involved in county lines.

Useful information:

Preventing youth violence and gang involvement government guidance Criminal exploitation of children and vulnerable adults: county lines government guidance London Child Protection Procedures on gang activity and serious youth violence

School-related weapons incidents

The AfC School Related Weapons or Potential Weapons Incidents Protocol guides schools in their response to school-related weapon incidents. Children's services and the police will be informed of any incident involving a weapon or a potential weapon. Teachers have the legal power to search children without consent for a number of 'prohibited items', including weapons as covered in the government's Searching, screening and confiscation guidance.

Children and young people involved in school-related weapons incidents are vulnerable, including the person associated with the weapon. Support, protection and education will be provided to keep the child safe and develop their understanding of the implications of carrying or using weapons.

Children absent from education

Children missing from education, persistently absent without explanation or for prolonged periods can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation. It may also indicate mental health problems, risk of substance abuse, travelling to conflict zones and FGM,

so called 'honour'-based abuse or risk of forced marriage. Absence from education can also increase existing safeguarding risks.

Attendance is closely monitored to support schools with identifying risk of harm and acting early. Staff should be aware of the school's unauthorised absence and children missing education procedures. Children's services will be notified if a child who has a social worker is absent from school without a suitable explanation. To support the procedure for addressing children missing or absent from education, schools have more than one emergency contact number for each child. Schools work in partnership with the local authority when patterns of absence give rise to concern, including notifying them when a child leaves The School without a new school being named.

In line with the Early Years Statutory Framework guidance, attendance will also be monitored for children attending a setting who are not of statutory school age. The school's safeguarding procedures will be followed if there are concerns about prolonged absences or if a child is absent without notification from the child's parent or carer despite The School making attempts to contact them. This may include a referral to children's services and/or request for a police welfare check. The School follows the government's Working together to improve school attendance statutory guidance.

Useful information:

Local partnership guidance

Children Missing Education statutory government guidance

Children who run away or go missing from education, home or care

Children who run away, go missing or are absent from education or their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, The School will facilitate RHIs both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school site for the interview to take place. The KRSCP's missing children procedure is followed when required.

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becomes difficult or even impossible to cope with. 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. Staff will be trained to recognise signs that a child may be experiencing a mental health problem. The School will work hard to promote positive mental health for all staff and children taking into account the government's Promoting and supporting mental health and wellbeing in schools and colleges guidance.

Useful information:

Local partnership guidance

Mind

NSPCC: Child mental health

AfC information and advice for young people, including LGBTQI+ mental health resources

Domestic abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home or suffer domestic abuse in their own intimate relationships (often called teenage relationship abuse). The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, some older children can also commit domestic abuse either in their own intimate relationships or against their caregivers.

Domestic abuse experiences can have a serious and long-term impact on a child's health, wellbeing, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. When the police attend incidents of domestic violence or abuse that involve children, they are required by law under the Operation Encompass programme (https://www.operationencompass.org/) to notify the child's school or other place of education. They do this before the start of the next school day. The police do this for children who:

- were directly involved with the incident

- may be affected but weren't present at the time of the incident
- are connected to the household, even if they're living elsewhere

Once informed, the safeguarding team will provide silent support according to the child's needs and update records to reflect their circumstances.

Useful information:

Local partnership guidance

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism or supporting extremist views. Schools have a statutory role in preventing children from becoming terrorists or supporting terrorism.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Radicalisation is a grooming process that can occur over a period of time or quickly.

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. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause. To prevent children from being radicalised, schools ensure:

- their filtering and monitoring systems prevent and protect children from accessing extremist material
- children are taught about British values and staying safe online via the curriculum
- children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views

- staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible
- the safeguarding team attend Prevent awareness training and is aware of the latest guidance
- it has a risk assessment assessing how learners and staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local safeguarding children partnership

The Educate against hate government website provides a list of signs that could indicate a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

Useful information:

Local partnership guidance

Protecting children from radicalisation: the prevent duty

Child abuse linked to faith or belief

This type of abuse can happen anywhere and across any community or religion. There are a variety of definitions associated with abuse linked to faith or belief, including, but is not limited to, the concept of belief in:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)

- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

Staff will follow the school's safeguarding procedure if they suspect a case of child abuse linked to faith or belief. The safeguarding team may contact the Metropolitan Police's Project Violet team on the non-emergency 24/7 number 101.

Useful information:

Metropolitan Police advice

Short Youtube introduction video

National FGM Centre

So-called 'honour'-based abuse, FGM and forced marriage

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and breast ironing practices. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators. As a result, children's services will be consulted before The School takes action to reduce the dynamic and additional risk factors that might be present.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical purposes. It is sometimes known as 'cutting' or female 'circumcision'. FGM is illegal in England and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk.

Signs that FGM might happen include:

- a relative or someone known as a 'cutter' visiting from abroad
- a special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'

- a female relative, like a mother, sister or aunt has undergone FGM
- a family arranges a long holiday overseas or visits a family abroad during the summer holidays
- a girl has an unexpected or long absence from school
- a girl struggles to keep up in school
- a girl runs away or plans to run away from home (NSPCC)

Signs FGM might have taken place include a child who is:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school or college
- reluctance to go to the doctors or have routine medical examinations
- asking for help, though they might not be explicit about the problem because they're scared or embarrassed (NSPCC)

If a child has experienced or is at risk of female genital mutilation

As with other safeguarding concerns, staff will speak to the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM. If a teacher (i.e. an individual who is employed or engaged to carry out teaching work in our school) comes to know (disclosed or seen) in the course of their work that a child has experienced FGM they must directly report it to the police. Failure to do so will result in disciplinary sanctions.

Useful information:

Female Genital Mutilation Statutory Guidance

Local partnership guidance

National FGM Centre

Forced marriage

A forced marriage is non-consensual. Either person could be forced or pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales. An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage,

but the choice of whether or not to accept the arrangement remains with those who are considered for marriage. The legal age for marriage in the UK has risen to 18 regardless of parental consent. The DSL will respond to reported forced marriage concerns by following the local safeguarding procedure and, if necessary, seeking advice from the Forced Marriage Unit on 020 7008 0151.

Useful information:
Freedom charity
Handling cases of forced marriage guidance
National FGM Centre

Modern slavery

Modern slavery is a crime whereby a person uses another person by means of deception or coercion as a possession for the purposes of exploitation. Modern slavery exists in the UK and some victims are children. According to the Home Office briefing, 'Children are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, transported, received or harboured for the purpose of exploitation'.

Common places modern slavery occurs:

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

Victims can also be forced into criminal activities such as cannabis production, theft or begging. Where modern slavery is suspected, the safeguarding team will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the Modern Slavery helpline on 0800 012 1700.

Useful information:

Modern slavery: how to identify and support victims

Modern slavery: a briefing

Fabricated or induced illnesses

Fabricated or induced illness (FII) is a rare form of child abuse. The London Safeguarding Children Procedures define FII as 'a clinical situation where a child is, or is very likely to be, harmed due to parents'/carers' behaviour and action, carried out to convince doctors that the child's state of physical and/or mental health or neurodevelopment is impaired (or more impaired than is actually the case)'. It is essential that schools are alert to medically unexplained symptoms. School policy on supporting children with medical needs should detail the procedure for ensuring reported medical needs are supported and evidenced by medical professionals.

Useful information:

The Royal College of Paediatrics and Child Health (RCPCH) guidance London Child Protection Procedures: FII/Perplexing Presentations

Drugs and alcohol

Our curriculum provides opportunities for age-appropriate education on the risks and effects of drug, alcohol, tobacco and vapes. We are also offering drug and alcohol awareness workshops for specific year groups. The School prioritises the safety and wellbeing of children who use or are at risk of using drugs or alcohol by adopting a safeguarding-first approach. Drug and alcohol use can be an indicator of underlying vulnerabilities or harm. Staff are trained to recognise the signs of drug and alcohol use and its potential links to other safeguarding concerns. Schools work together with external agencies, such as children's services, health professionals and the police to ensure children receive appropriate early help and interventions. Where there is concern that a pupil is under the influence of drugs, alcohol, tobacco or vapes or they are present on school premises, the staff will act in line with the school's safeguarding policy, first aid procedures, behaviour policy and, where applicable, the When to call the police guidance.

Useful information:

Local partnership guidance

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The safeguarding team is aware of the contact details and referral routes into the Local Housing Authority so they can raise and progress concerns at the earliest opportunity. A referral will be made to children's services if a child has been harmed or is at risk of harm. Indicators that a family may be at risk of homelessness include:

- household debt
- rent arrears
- domestic abuse and antisocial behaviour
- the family being asked to leave a property

Private fostering

A private fostering arrangement is where someone other than a parent or a close relative care for a child for a period of 28 days or more with the agreement of the child's parents. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16 or 18 if the child is disabled. By law, a parent or other persons involved in making a private fostering arrangement must notify children's services of the arrangement as soon as possible. Schools have a duty to inform children's services if the local authority has not yet been notified.

Useful information:

Looking after someone else's child
Local partnership guidance

Appendix C: Allegations against staff and low-level concerns procedure

Concerns or allegations that may meet the harm threshold

The School has a whole school approach to safeguarding, and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of The School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Despite all efforts to recruit safely, there may be cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in our school.

Such allegation is any information which indicates that a member of staff, supply staff, volunteers or contractors may have:

- 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.

This applies to any child that the member of staff, supply staff or volunteer has contact with in their personal, professional or community life, as if they had child protection concerns raised for their own children.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school's code of conduct and the 'Guidance for safer working practice for adults who work with children and young people in education settings':

Guidance for safer working practice for those working with children and young people in education settings February 2022

Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction. All staff should be aware of the German School London's Behaviour Policy. All school staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

If a pupil makes an allegation against a staff member, or if staff have concerns about another member of staff, anyone who receives this information or has concerns about someone's suitability to work with children will immediately inform the Headteacher or the Commercial Director.

On such occasions, the Headteacher or the Commercial Director or the DSL will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

Where the Headteacher or the Commercial Director is subject of an allegation, the chair of governors will consult the LADO as above, without notifying the Headteacher or Commercial Director first. Contact details for the chair of governors can be found on page 5 of this policy under Key Personnel.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home
- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people

In cases where the school identifies that a child has been harmed, or might be at immediate risk of harm, or if the situation is an emergency, the school will contact the local authority Children's Social Care and as appropriate the police immediately.

The School will follow the London Child Protection Procedures for managing allegations against staff London child protection procedures: allegations and procedures set out in the

Keeping children safe in education statutory guidance

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the Headteacher or Commercial Director will seek the

advice of the LADO and HR in making this decision. All options to avoid suspension will be considered. In the event of an allegation against the Headteacher or the Commercial Director, the decision to suspend will be made by the chair of governors in consultation with the LADO and HR.

If the allegation is regarding supply, The School will ensure that allegations are dealt with properly. In no circumstances will The School cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply worker, or redeploy them to another part of The School, while they carry out their investigation.

If an allegation pertains to another adult not employed directly by The School, for example catering staff, cleaning staff, peripatetic teachers, sports coaches or a former member of staff, The School will work directly with the employing agency and the LADO as described above.

We will ensure that all external agencies used are provided with details of The School's process for managing information. We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. If a teacher is dismissed due to serious misconduct or might have been dismissed, had they not left first, consideration will be given as to whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

Low-level concerns

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 of harm. 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

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

Examples of such behaviour could include, but are not limited to:

- being over friendly with children,
- having favourites,
- taking photographs of children on their personal mobile phone,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, ranging from inadvertent or thoughtless actions, or behaviour that may seem inappropriate in certain circumstances, through to actions that are ultimately intended to enable abuse.

The culture of our school is such that staff are encouraged to pass on low-level concerns to the DSL or a member of the SLT. These concerns will be recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of The School from potential false allegations or misunderstandings.